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Study on a proposal for EU rules for the recognition of qualifications and validation of skills of third country nationals

Final Report

Written by: EY Advisory S.p.A (Antonino Sorrenti, Giorgia Renoldi, Elisa Colaiacomo, Federico Filauri); IRS (Flavia Pesce, Nicola Orlando, Maria Juliana Charry Camargo, Siro Ciarimboli)

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Contact: EMPL B5 Unit

E-mail: EMPL-B5-UNIT @ec.europa.eu

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Directorate-General for Employment, Social Affairs and Inclusion

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List of abbreviations

AFSJ	Area of Freedom, Security and Justice
AHQ	Ad Hoc Query
AI	Artificial Intelligence
BRT	Better Regulation Toolbox
CAs	Competent Authorities
CEDEFOP	European Centre for the Development of Vocational Training
CSO	Civil Society Organisation
DEQAR	Database of the External Quality Assurance Results
DG	Directorate-General
DG EMPL	Directorate-General for Employment and Social Affairs
DG SANTE	Directorate-General for Health & Food Safety
EEA	European Economic Area
EFN	European Federation of Nurses
ENIC	European Network of Information Centres
EPC	European Professional Card
EQF	European Qualifications Framework
ESCO	European Skills, Competences, Qualifications and Occupations
ETF	European Training Foundation
EU	European Union
GoC	Group of Coordinators
HR	Human Resources
IA	Impact Assessment
ICMPD	International Centre For Migration Policy Development
ICT	Information and Communication Technology
IMI	Internal Market information System
IOs	International Organisations
IOM	International Organisation for Migration
IRS	Istituto Ricerca Sociale
MCDA	Multi-Criteria Decision Analysis
MPF	Migration Partnership Facility
MRA	Mutual Recognition Agreement
MS	Member State
NARIC	National Academic Recognition Information Centre
NGO	Non-Governmental Organisation
NQF	National Qualifications Framework
OECD	Organisation for Economic Co-operation and Development
PC	Public Consultation
PES	Public Employment Services
PO	Policy Option
PQD	Professional Qualifications Directive 2005/36/EC
PSC	Point of Single Contact
QA	Quality Assurance
SMEs	Small-Medium Enterprises
SPI	Skills Portability Initiative
TCNs	Third Country Nationals

TCQs	Third-Country Qualifications
TFEU	Treaty on the Functioning of the European Union
VET	Vocational Education and Training
WISEs	Work Integration Social Enterprises

Executive summary

This executive summary[1] accompanies the **Final Report of the Study on a proposal for EU rules for the recognition of qualifications and validation of skills of third-country nationals (TCNs)**, focusing on targeted aspects relevant to the **Skills Portability Initiative (SPI)**. The study was commissioned by the **European Commission, Directorate-General for Employment, Social Affairs and Inclusion (DG EMPL)** and carried out by a consortium led by **EY Advisory SpA**, with the **Institute for Social Research (IRS)** as partner.

Policy context

The recognition of qualifications and validation of skills of TCNs, particularly those acquired outside the EU, lies at the intersection of **EU migration policy, labour market access and the regulation of professions**. While education systems and the regulation of professions largely remain within Member State competence, the **conditions governing the entry, residence and access to employment of TCNs fall within a shared competence** under the Treaty on the Functioning of the European Union (TFEU).

The EU framework for the recognition of professional qualifications, notably **Directive 2005/36/EC**, is primarily designed to facilitate **intra-EU mobility of EU-acquired qualifications**. TCNs holding third-country qualifications (TCQs), as well as EU citizens with TCQs, largely remain subject to **national recognition regimes**, resulting in significant divergence across Member States with regard to **procedures, timelines, costs and outcomes**.

This has contributed to a **structural misalignment between migration frameworks and recognition systems**, characterised by parallel procedures, limited transparency and duplication of assessments. These challenges affect not only individual applicants and employers, but also the **functioning of the EU labour market** and the **effective use of skills**, particularly in sectors facing persistent labour shortages. In a context of demographic ageing and increasing global competition for talent, these weaknesses are likely to become more pronounced.

Objectives and scope of the study

This study focuses on qualifications and skills **acquired outside the EU**, and on the legal, administrative and systemic barriers affecting access to the EU labour market, especially in **regulated professions**. The analysis covers **26 EU Member States**,[2] reflecting differences

[1] This is a preliminary draft of the executive summary that will be integrated with a summary of the findings related to the analysis of the impacts of the policy options.

[2] The geographical scope encompasses 26 Member States, as Denmark maintains an opt-out for Justice and Home Affairs, including migration-related issues. Conversely, the scope includes Ireland, as the latter maintains a more flexible opt-out for Justice and Home Affairs matters, with the possibility to opt-in on a case-by-case basis.

in national recognition systems, institutional arrangements and labour market needs across sectors.

The study considers the roles and interactions of key actors involved in recognition and validation processes, including **Competent Authorities (CAs)**, **European Network of Information Centres** (**ENIC)- National Academic Recognition Information Centre (NARIC) centres**, **national Migration Authorities** and **employers**, as well as the experiences of **individual TCNs** navigating recognition, validation and migration procedures.

Adopting a **forward-looking perspective**, the study aims to identify policy options that could strengthen the EU's capacity to attract and retain talent, facilitate labour-market integration and support labour mobility over the medium and longer term. It explores the potential role of **EU-level action** in supporting **simpler, more transparent and more efficient procedures** for the recognition of qualifications and validation of skills of TCNs.

In support of these objectives, the study seeks to:

- **Identify the core problems** experienced by TCNs and other relevant actors, including employers and recruiters, in relation to recognition and validation procedures across Member States;
- **Understand the impact of the fragmentation of national qualification recognition systems and procedures** on the capacity of Member States to attract, recruit and integrate TCNs with a view to effectively use their skills.
- **Examine the potential and feasibility of enhanced EU-level coordination**, including possible EU rules aimed at simplifying recognition procedures and improving skills validation, taking into account effectiveness, proportionality and subsidiarity.

Methodological approach

The study relies on a **mixed-methods approach**, combining desk research with extensive stakeholder consultation.

Desk research covered EU legal and policy frameworks, Commission reports, previous impact assessments, academic literature and relevant administrative and statistical sources. Primary evidence was gathered through **strategic interviews** with EU-level institutions and experts; **targeted interviews** with CAs, employers, professional bodies, International Organisations (IOs), civil-society organisations (CSOs) and ENIC-NARIC centres; **surveys** addressed to CAs, ENIC-NARIC centres, national Migration Authorities and TCNs; and **focus groups** covering regulated professions (including healthcare), labour-migration authorities, employers, information and support services and individual TCNs. The analysis also draws on contributions to the SPI public consultation (PC).

Problem definition

The analysis identifies the **core problem as the complexity, administrative burden and lack of transparency of procedures for the recognition of qualifications and validation**

of skills of TCNs seeking to work in the EU, resulting in uncertain and at times inconsistent outcomes across Member States.

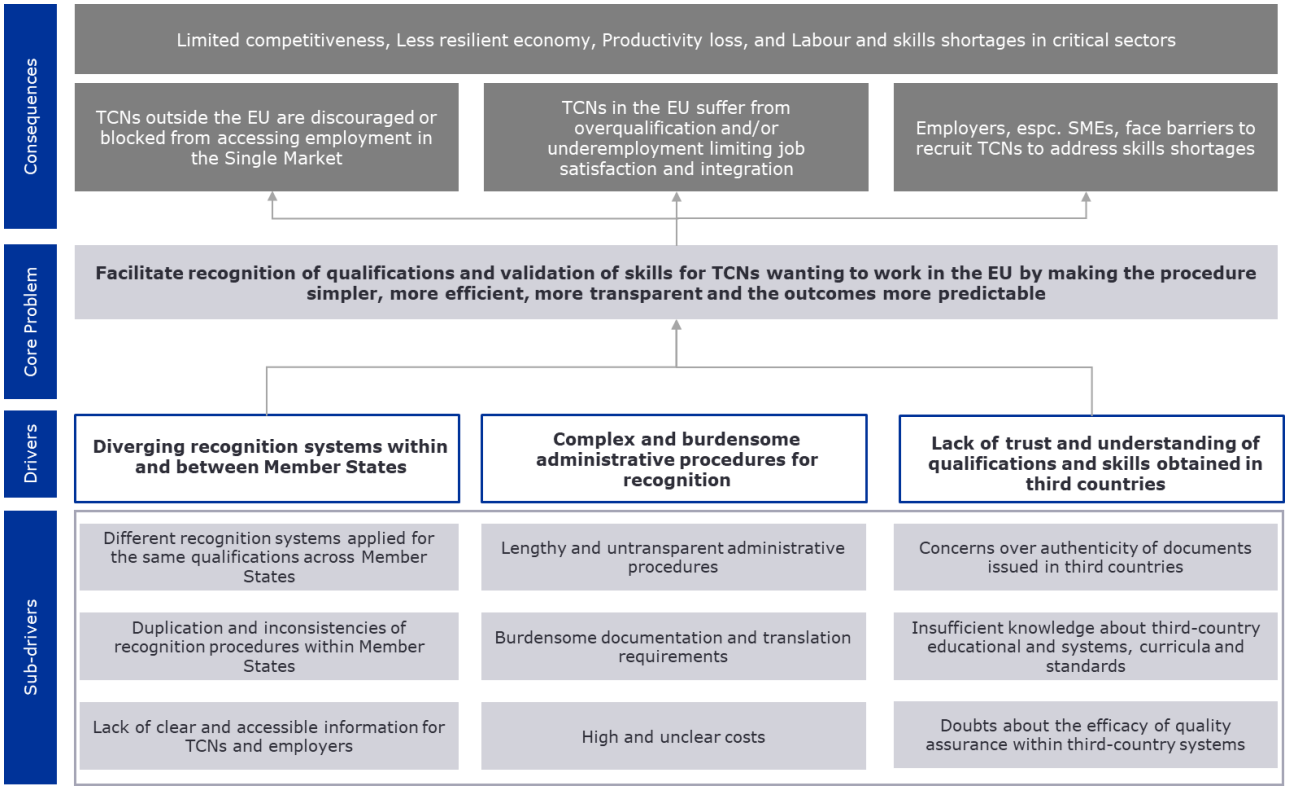
This core problem is underpinned by three interrelated drivers:

- **Heterogenous and fragmented procedures between and within Member States**
- **Complex, lengthy and burdensome procedures**
- **Lack of trust and understanding of qualifications and skills obtained in Third Countries**

Together, these drivers contribute to **delayed labour market entry for TCNs**, **underutilisation of skills**, **recruitment difficulties for employers**—particularly small and medium-sized enterprises—and **persistent shortages in key sectors**. They also **reduce transparency and predictability** for applicants and may **weaken the EU's overall attractiveness** as a destination for talent. In the absence of further EU-level action, demographic ageing and evolving skills needs linked to the green and digital transitions are expected to reinforce these challenges.

The figure below shows a **problem tree**, which serves as the methodological backbone of the impact assessment and links the **core problem** to its **drivers, underlying causes and consequences**.

Figure 1 - Problem tree



Policy options

To address the identified problem, the study developed and screened a long list of policy measures, resulting in **three policy options (POs)**, in addition to the baseline scenario (status quo), under which recognition and validation of third-country qualifications remain primarily organised at Member State level, characterised by fragmentation, procedural complexity and limited coordination with labour-migration systems.

- **PO 1 – Building on existing mechanisms to improve recognition and validation**: a non-legislative approach relying on guidance, voluntary cooperation, mutual learning, capacity-building and supportive digital tools. This option seeks to improve information availability, administrative practices and trust in TCQs by strengthening existing EU initiatives and cooperation mechanisms, while preserving national discretion.
- **PO 2 – Common rules to streamline procedures**: a legislative approach introducing binding common procedural rules at EU level to reduce fragmentation, complexity and unpredictability in recognition and validation procedures. The focus is on procedural alignment—such as information requirements, coordination between authorities, documentation, timelines and fees—while leaving substantive recognition decisions and admission policies to Member States.
- **PO 3 – Common rules including automatic recognition for selected professions**: A legislative approach building on PO 2, which would introduce automatic recognition for selected TCQs in regulated professions based on prior verification of education and training programmes against EU standards. It aims to deliver faster, more consistent outcomes and significantly reduce administrative burden in professions facing acute labour shortages.

Together, these options provide a graduated and proportionate response to the identified problem, aligned with the objectives of the Skills Portability Initiative and the broader Union of Skills.

1 Introduction

This report presents the Study on a proposal for EU rules for the recognition of qualifications and validation of skills of third-country nationals (TCNs). The study was carried out by **EY** and **IRS** on behalf of the **European Commission, Directorate-General for Employment, Social Affairs and Inclusion (DG EMPL)**.

The report sets out the analytical basis for assessing possible EU action in this area. It first defines the **objectives, scope** and **methodological approach** of the study. It then provides a **problem definition**, identifying the core problem affecting the recognition of qualifications and validation of skills of TCNs, its main drivers, consequences and expected persistence over time. On this basis, the report examines the **rationale for EU action**, including the legal basis, subsidiarity considerations and the added value of action at EU level.

Building on this analysis, the report develops a **baseline scenario and a set of POs**, followed by a **comparative assessment of their impacts**. The report concludes with a **comparison of POs and the identification of a preferred option**, in line with the Better Regulation Toolbox (BRT), TOOL # 11-#17.

1.1 Objectives and scope of the study

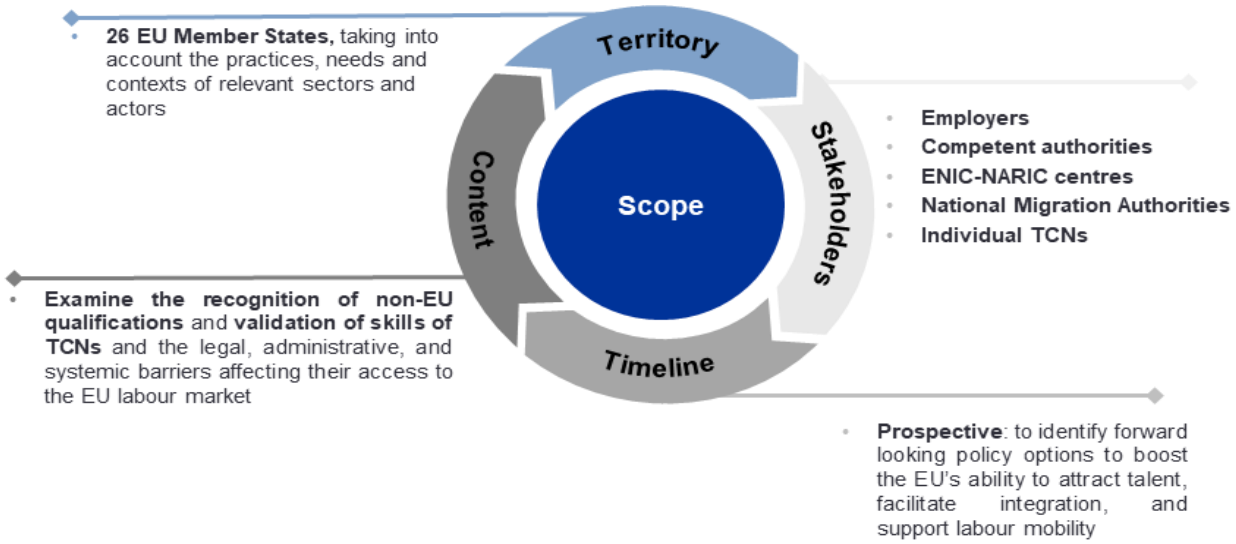
1.1.1 Objectives

This study explores possible EU common rules for simpler procedures for handling the recognition and validation of qualifications and skills of TCNs. In doing so, the study seeks to: (i) identify the core problems experienced by TCNs and other relevant actors, including employers and recruiters in relation to the recognition of qualifications and validation of skills of TCNs by respective Member States in the EU; (ii) understand the impact of the fragmentation of national qualification recognition systems and procedures on the capacity of Member States to attract, recruit and integrate TCNs with a view to effectively use their skills; (iii) assess the potential and feasibility of greater EU-level coordination, including possible EU rules to simplify qualification recognition procedures for TCNs and improving validation of skills.

1.1.2 Scope

The scope of the study refers to four **key dimensions**, as outlined in Figure 2.

Figure 2 - Scope of the study[3]



Source: Author's elaboration

For the purpose of this study, "recognition of qualifications" is considered to cover any process of assessing skills and qualifications with a view to granting a third-country national (1) a visa or work and residence permit, and/or (2) access to a regulated profession. This can encompass formal recognition procedures resulting in formal acknowledgement by a relevant authority of the validity of a foreign qualification, as well as comparison statements and advisory opinions, authenticity checks, and administrative requirements such as the translation or legalisation of original documents.

"Validation of skills" is used to describe any process designed to give visibility to the skills and experience of TCN third-country nationals that are not, or not fully, captured by their formal qualifications. Validation may be carried out by a wide range of actors across the education and training sector, the labour market and civil society, and may include processes to identify, document, assess and certify non-formal and informal learning and professional experience

1.2 Legal and policy context

1.2.1 EU context

The recognition of qualifications and validation of skills of TCNs within the EU is currently governed by a complex and fragmented legal framework. Recognition and validation procedures are largely determined at the national level, reflecting differences in administrative structures, labour -market needs, and regulatory traditions. At EU level, the EU migration acquis has granted certain categories of TCNs a right to equal treatment with nationals of the host Member State in specific areas, including access to employment and,

[3] The geographical scope encompasses 26 Member States, as Denmark maintains an opt-out for Justice and Home Affairs, including migration-related issues. Conversely, the scope includes Ireland, as the latter maintains a more flexible opt-out for Justice and Home Affairs matters, with the possibility to opt-in on a case-by-case basis.

where applicable, the recognition of qualifications. Moreover, the interaction of this EU migration acquis with the Professional Qualifications Directive (PQD)[4] means that in specific, limited situations certain categories of TCNs seeking recognition of their qualifications to access a regulated profession may be able to benefit from the recognition rules laid down in the PQD.

1.2.1.1 Recognition of qualifications of TCNs

Recognition of qualifications refers to the formal acknowledgement by Competent Authorities (CAs) of the validity of a foreign qualification, with the aim of granting specific rights to the holder.[5] Recognition of qualifications enables access, in particular, to regulated professions, where national law requires specific professional qualifications to carry out certain activities, and can also play a role in successfully completing labour migration procedures, in which Member States often assess qualifications for the purpose of issuing visas, work permits, or residence permits for employment.

Recognition of qualifications of TCNs is currently governed primarily by Member States' national law. It cuts through different policy areas such as access to employment and economic activities, regulation of professions, competitiveness of the Single Market, education and migration. While some aspects of these domains fall within the exclusive competence of Member States, i.e. the content and organisation of the education system and vocational training (Articles 165 and 166 TFEU) and determining the volume of admissions for legal migration (Art. 79(5) TFEU), most of these are shared competences between the EU and the Member States. In line with **Article 5 TEU**, the EU shall only act within the limits of the competences conferred upon it in the Treaties and shall exercise those competences in line with the principles of subsidiarity and proportionality.

For the specific case of **recognition to access regulated professions**, the EU has exercised its competences to remove barriers to free movement in the internal market for EU citizens by adopting directives to ensure the mutual recognition of diplomas, certificates and other evidence of formal qualifications.[6] A detailed overview on the EU framework specifically affecting recognition for TCNs seeking to access a regulated profession and the EU framework affecting recognition of qualifications of TCNs more broadly is provided respectively in Annex 7.1 and Annex 7.2 .

1.2.1.2 Validation of skills

Skills refer to the ability to apply knowledge and use know-how to complete tasks and solve problems, while the validation of skills concerns the assessment of this ability to effectively deploy acquired knowledge and know-how in practice.[7] While the recognition of formal

[4] European Parliament & Council of the European Union. (2005). Directive 2005/36/EC on the recognition of professional qualifications. Official Journal of the European Union. Available at: https://eur-lex.europa.eu/eli/dir/2005/36/oj/eng
[5] CEDEFOP (2014). Terminology of European education and training policy: https://www.cedefop.europa.eu/files/4117_en.pdf
[6] Art. 46 TFEU, Art. 53 TFEU and Art. 62 TFEU.
[7] CEDEFOP (2014). Terminology of European education and training policy: https://www.cedefop.europa.eu/files/4117_en.pdf

qualifications is of primary importance when assessing access to regulated professions, a skills-first approach tends to be more appropriate in the context of unregulated professions, where demonstrated competences may be prioritised over formal credentials.[8]

The Skills validation framework is based on the **Council Recommendation on Validation of non-formal and informal learning** of 2012,[9] an EU instrument calling on all Member States to establish arrangements that allow individuals to identify, document, assess and certify learning outcomes acquired outside formal education. The Recommendation applied to both EU citizens and TCNs equally, enabling pathways into jobs, further learning, or formal qualifications via Recognition of Prior Learning (RPL) and Validation of Non-Formal and Informal Learning (VNFIL) procedures.

Building upon the Council Recommendation of 2012, the validation of skills within the EU has steadily evolved towards more structured, transparent, and effective procedures to validate and consider skills of TCNs. Annex 7.3 provides further details on the EU initiatives on validation of skills.

1.2.2 National Context

1.2.2.1 National practices for recognition of professional qualifications of TCNs to access regulated professions

As the recognition of professional qualifications of TCNs largely depends on Member States' national legal and regulatory frameworks, TCNs seeking access to regulated professions are required to navigate a fragmented and uneven legal and operational landscape. This landscape varies significantly both between and within Member States, reflecting differences in legislation, institutional arrangements, and administrative practices. Annex 8. provides a mapping of national practices in place to access regulated professions in the EU.

1.2.2.2 Qualifications and skills checks in the national migration systems

As discussed in the section above, Member States might also perform qualification and skills checks as part of legal migration pathways. Annex 8. provides a mapping examining how, and for which migration pathways, qualifications and skills checks are carried out across Member States, including the procedures applied and any potential duplications.

[8] In non-regulated professions, and outside of the migration procedure context, the decision whether to require the TCN to seek formal recognition of her foreign-acquired qualifications rests with the employer. Targeted interviews with 3 HR departments and 3 EU organisations of employers

[9] Council Recommendation of 20 December 2012 on the validation of non-formal and informal learning. Available at: EUR-Lex - 32012H1222(01) - EN - EUR-Lex

2 Methodological approach

Our methodological approach combines **targeted desk research** with **extensive fieldwork** devoted to collecting evidence required to carry the Impact Assessment (IA) foreseen in this assignment.

2.1 Desk research

The list of sources consulted for the desk research is provided in Annex 10. These include both publicly available materials and documents shared by DG EMPL that are not accessible online. Overall, the following types of sources were consulted:

- **EU policy and legal framework documents**, providing contextual information, the legal basis for the recognition of third-country professional qualifications in the EU, and insights into their relevance and priority on the EU policy agenda.
- **Commission reports, previous IA studies and various internal documents** on insights gathered by Member States on the recognition processes, which inform the definition of problems
- **Mapping and inventories of labour migration pathways**, including the Migration Partnership Facility (MPF)'s mapping of existing labour migration pathways and the to inform the mapping of qualifications and skills checks performed within migration pathways across EU Member States (Annex 7.).
- **European Migration Network (EMN) Ad-Hoc Queries (AHQs)** offering insights for the problem definition and for the mapping of the procedures to access regulated professions across EU Member States (Annex 9.).
- **Academic literature and other thematic studies**, providing additional analytical perspectives and evidence on issues related to third-country professional qualifications recognition.

2.2 Field research

As part of the **field research**, the following data-collection activities were carried out:

- **Strategic interviews** to refine the scope of the study and gather additional evidence on key issues affecting recognition procedures for TCNs holding non-EU qualifications, and potential adjustments suggested by stakeholders. A total of six interviews were conducted, respectively, with three European Commission officials (from DG EMPL, Directorate-General for Migration and Home affairs (DG HOME) and Directorate-General for Health & Food Safety (DG SANTE)), one European Training Foundation (ETF) official, one International Centre For Migration Policy Development (ICMPD) official, and one independent migration expert.
- **Targeted interviews** to gather evidence for the problem definition presented in Chapter 3 of this report, for the mapping of processes to access regulated professions across the EU (Annex 8) and for the mapping of qualifications and skills checks performed as part of migration requirements pathways across the EU Member States

(Annex 9). A total of 44 targeted interviews were performed with 15 relevant authorities in third countries (e.g. ENIC-NARIC centres, International Labour Organisation (ILO) offices, relevant ministries), four EU umbrella organisations of employers, six Human Resources (HR) departments involved with attracting talents from third countries, six IOs, five CSOs supporting TCNs with the recognition of their professional qualifications and validation of skills, five EU level representative bodies of professional associations, and three additional relevant stakeholders (i.e. ENIC NARIC centres and Public Employment Services (PES)).

- **Four surveys** to collect evidence on: (i) **the procedures and volumes** related to the recognition of qualifications and the validation of skills under formal frameworks; (ii) **the practical implementation** of these procedures; and (iii) **the relationship between qualification recognition, skills validation, and labour-migration pathways.**
  - **One survey targeted at national CAs** responsible for recognition processes applying to the seven sectoral professions under automatic recognition. The survey was disseminated by members of the Group of Coordinators (GoC).
  - **A second survey targeted at ENIC-NARIC centres** to gather insights regarding their involvement in the recognition processes and to triangulate findings on recognition procedures. The survey was circulated by DG EAC and reminders were sent to participants of the Focus Group of 5 March 2026.
  - **A third survey targeted at migration authorities** to gather insights on their involvement in recognition procedures. The survey was circulated by DG HOME and reminders were sent to participants of the Focus Group of 3 March 2026.
  - **A fourth survey targeted at TCNs** to gather first-hand evidence of their experiences with qualification recognition and skills validation procedures. Dissemination relied on a mixed strategy combining direct outreach, snowball dissemination through professional organisations, CSOs and youth organisations, and social media. This survey has been launched on 16 April 2026 and will remain open until 4 May 2026.[10]
- **Seven Focus Groups**, to collect feedback on the expected impacts of the preliminary policy measures designed to address the problems affecting the recognition processes.
  - **A Focus group on labour migration** was held on 3 March 2026 with labour migration authorities from 13 EU Member States involved with the checks of qualifications and skills in the context of migration pathways and four IOs.
  - **A Focus Group on information and support to TCNs** was held on 5 March 2026 with staff members of ENIC NARIC centres and PES from 18 Member States and two European Economic Area (EEA) Members (i.e. LI, NO) and 5 CSOs.
  - **A Focus Group on access to regulate professions** was held on 9 March 2026 with CAs on the professions of electricians and crane operators from 10 Member States

[10] The result of this survey will be integrated in un updated version of this report that will be shared with DG EMPL by Friday 8 May 2026

- **A Focus Group on the healthcare sector** was held on 13 March 2026 with CAs in the healthcare sector from 12 Member States and four EU professional associations.
- **A Focus Group on attracting talent** was held on 15 March 2026 with HR departments and talent partnerships stakeholders from 11 Member States and seven EU umbrella organisations
- **A Focus Group with 12 individual TCNs** was held on 17 March 2026
- **A Focus Group on automatic recognition** was held on 14 April 2026 with Quality Assurance (QA) bodies from nine EU Member States and five third countries, as well as ETF officials.

- **A PC** supporting the IA of the SPI was conducted between December 2025 and February 2026 with the aim of collecting stakeholders' feedback on the recognition of qualifications and the validation of skills acquired outside the EU. Complemented by a Call for Evidence, the consultation yielded 785 responses, of which 486 were retained for analysis relevant to Action 3. These responses reflect the views and experiences of TCNs, EU citizens with TCQs, employers, public authorities, CSOs, social partners, academic stakeholders and other relevant actors involved in recognition, recruitment and labour market integration of TCNs. See Annex 10. for further details.

The synopsis report provided in Annex 2. includes an overview of the consultation tools used as well as the types of stakeholders consulted and the outcomes of the consultations.

3 Problem definition

In this chapter we present the core problem, its drivers and underlying issues, as well as their consequences.

3.1 What is the problem?

Despite the initiatives taken by the EU and some Member States to facilitate the recognition of TCNs' qualifications, many professionals holding qualifications and/or skills gained outside the EU and willing to work in the EU face considerable challenges for the recognition of such qualifications and experience.[11] Indeed, as it will be shown in section 3.2, the **procedures for the recognition of qualifications and validation of skills for TCNs willing to work in the EU are complex, burdensome, lengthy, costly and untransparent leading to inconsistent and unpredictable outcomes.**

For TCNs considering moving to the EU, and particularly for those holding qualifications in regulated occupations, the complexity, length and uncertainty of qualification recognition procedures (according to 61,6% of TCNs), as well as the fragmentation of recognition procedures across EU Member States (66,3%) act as deterrents.[12] For TCNs already in the EU, these challenges lead to widespread underutilisation of skills, with TCNs experiencing the highest overqualification rates in the EU and significantly overrepresented in essential but often lower-skilled sectors.[13] Highly skilled TCNs tend to work below their qualification level at nearly twice the rate of overqualification observed among domestic citizens. At the same time, employers struggle to understand and verify foreign qualifications, navigate complex recruitment and recognition procedures for new TCN hires (as corroborated by 41% respondents to the PC), and face a high degree of uncertainty of the outcomes of these procedures - all factors that contribute to recruitment bottlenecks.[14] As a result, the EU's

[11] PC analysis Annex 10. Q24 "To what extent do you consider the following challenges related to skills portability in the EU to be a problem?" (n=486); Focus group with individual TCNs (n=12); Focus Group on information and support to TCNs with ENIC NARIC centres, PES and CSOs (n=37); Focus Group on access to regulated professions with CAs of electricians and crane operators (n=20); Focus Group on labour migration with migration authorities and IOs (n=28); Focus Group with CAs in the healthcare sector (n=31); targeted interviews with nine third country authorities, two EU umbrella organisations, four HR departments ; five IOs, five CSOs, four EU professional associations, two ENIC NARIC centres and one PES; European Commission: Directorate-General for Migration and Home Affairs, Kantar Public, Milieu Consulting, PwC and Ramboll Management Consulting (2023). Study in support of the impact assessment on the development of an EU talent pool – Final report, Publications Office of the European Union. Available at: https://data.europa.eu/doi/10.2837/670902.;

[12] PC analysis Annex 10. Q24 "To what extent do you consider the following challenges related to skills portability in the EU to be a problem?" (n=486); Targeted interviews with four IOs, two TC authorities and three HR departments; Focus Group on access to regulated professions with CAs of electricians and crane operators (n=20); Focus Group with CAs in the healthcare sector (n=31); Focus group with individual TCNs (n=12); Focus Group on information and support to TCNs with ENIC NARIC centres, PES and CSOs (n=37); Focus group on attracting talent with HR departments and talent partnerships stakeholders (n= 27)

[13] PC analysis Annex 10. Q26 "Do you think there are other issues that make it harder for people to have their skills and qualifications understood, recognised and valued in another country? Please, elaborate" (n=486); Eurostat (2023). Main obstacles for foreign-born people to enter the labour market. Available at: 108006.pdf

[14] PC analysis Annex 10. . Q24 "To what extent do you consider the following challenges related to skills portability in the EU to be a problem?" (n=486); Targeted interviews with four EU umbrella organisations, three HR departments, two IOs;

ability to attract and retain global talent is weakened, while persistent labour and skills shortages remain unaddressed, despite the availability of qualified TCNs.[15]

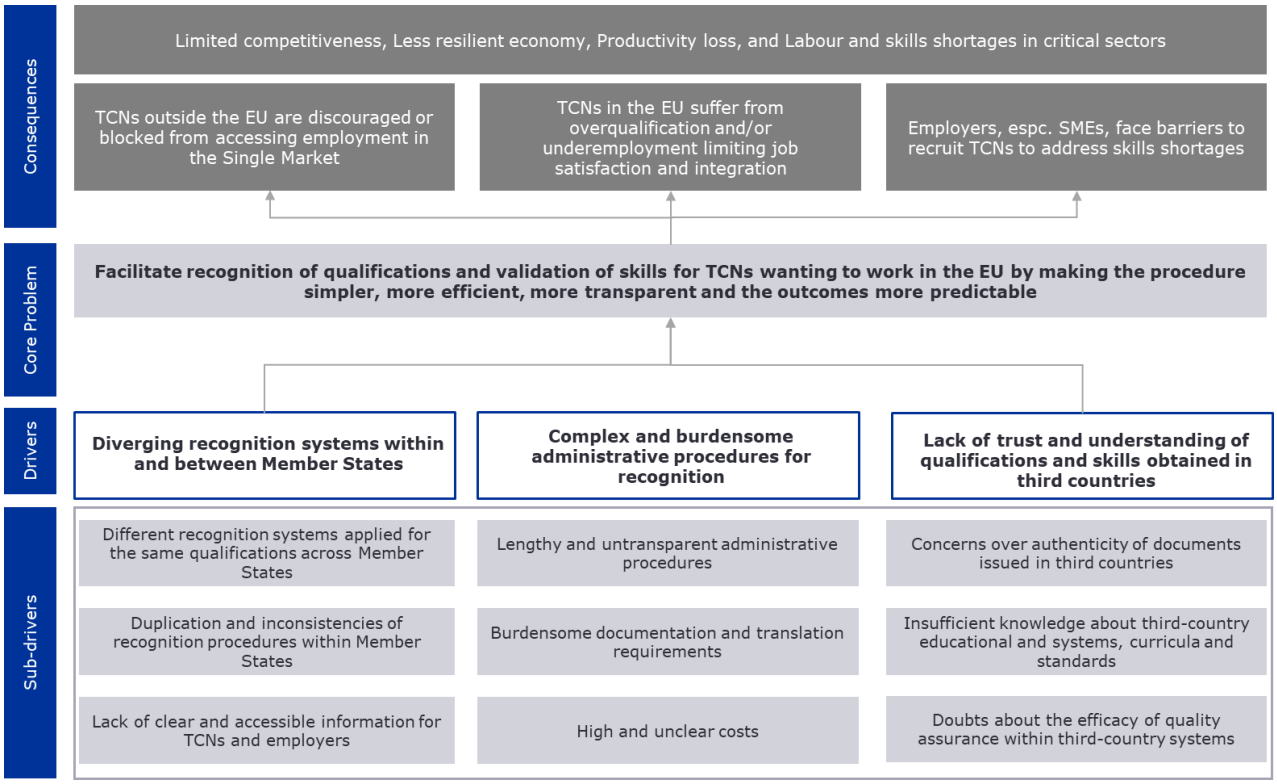
According to a recent Organisation for Economic Co-operation and Development (**OECD) report**, only one of the Union's Member States (SE) features in the top five most attractive OECD countries for highly educated workers in 2023, pointing to the low attractiveness of the Union.[16] In this context, the OECD stresses that the ability to attract talent depends on several factors, including recognition of qualifications, integration and inclusion in the labour market , and legal pathways to permanent residence. and . In sum, **inefficient recognition processes contribute to workforce underutilisation, misallocated human capital, and widening gaps between available talent and unmet labour demand, hindering the overall attractiveness of the EU for TCNs**. In addition, while the governance and implementation of qualification recognition for TCNs formally rest with national regulatory authorities in each Member State, the consequences of inefficiencies, fragmentation, and inconsistent practices extend beyond the national level, negatively affecting attractiveness of the EU as a whole. Indeed, such disparities contribute to skills underutilisation and labour-market mismatches that have cross-border effects, undermining the functioning of the EU single market, the mobility of skills, and the Union's broader objectives on competitiveness, inclusion, and talent attraction.

The following sections provide evidence on the drivers contributing to the core problem specifically: **the heterogeneity and fragmentation of national procedures for recognition of qualifications and validation of skills (Driver 1)**, **the complexities of national recognition procedures (Driver 2)**, t**he lack of understanding and trust by national authorities and employers from Member States of qualifications and skills obtained in third countries (Driver 3).**

[15] OECD/European Commission (2023), Indicators of Immigrant Integration 2023: Settling In, OECD Publishing, Paris, https://doi.org/10.1787/1d5020a6-en. targeted interviews with three HR departments, three EU Umbrella organisations and two EU bodies of professional organisations

[16] OECD (2023) *What is the best country for global talents in the OECD?* Migration Policy Debates 29. Paris. Available at: https://www.oecd.org/en/publications/what-is-the-best-country-for-global-talents-in-the-oecd_5186ab2d-en.html

Figure 3 - Problem Tree



Source: Author's own elaboration

3.2 What are the problem drivers?

3.2.1 Driver 1: Diverging recognition systems within and between Member States

3.2.1.1.1 Different recognition systems applied to the same qualifications across Member States

Since professional regulation and the recognition of qualifications and validation of skills for TCNs are almost entirely governed by national legislation and as an harmonised EU-level framework is lacking, there is significant variation across Member States both in terms of the **specific job sectors** that are regulated, and of the **procedures** required to access both regulated and unregulated professions.[17] Altogether, roughly 5,686 professions are regulated across the EU overall, but the number and type of regulated occupations differ

[17] European Commission- Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs (2024). Recognition of Qualifications of Third Country Nationals. Summary report of Commission webinars on the recognition of qualifications of third country nationals; EMN-OECD (2024), Labour migration in times of labour shortages. Available at link. EMN (2023-2019), Annual Migration Reports issued between 2019 and 2023. Available at: link. OECD (2017), Making Integration Work: Assessment and Recognition of Foreign Qualifications. Available at: link. Targeted interviews with two EU level representative bodies of regulated professions, two IOs and two HR departments.

substantially from one country to another,[18] meaning that the same profession may require formal authorisation to practice in one Member State and not in another. For instance, while the seven sectoral professions covered by the PQD are consistently regulated across Member States, others such as engineers teachers, psychologists or real estate agents, are regulated only in specific Member States.[19] Procedures for the recognition of qualifications and validation of skills are formal administrative processes through which CAs verify, assess and formally compare the duration and/or content of TCQs with EU qualifications. Their purpose is to determine the validity of TCQs and their comparability against national standards, and to establish eligibility for education or labour market access in regulated professions.[20] These procedures for recognition to access regulated professions typically encompass: **verification of the authenticity**, level and relevance of documents to the profession as regulated in the receiving country's regulatory system; **translation or apostille requirements**; the payment of **administrative fees**; **the assessment of the value and comparability of foreign qualifications against local standards and the possible imposition of compensation measures** (such as aptitude tests or adaptation periods); and the establishment of **timelines** for issuing decisions.[21] However, these procedures may vary to access the same type of professions across Member States. For instance, Annex 7. shows that these procedures (including evidence requirements and compensation measures) highly vary across Member States for the same professions in the healthcare sector (i.e. doctors, nurses, midwives).

Methodologies for assessing the authenticity of the qualification documentation also differ substantially. Approximately 50% of CAs **contact awarding institutions directly** (AT, BE, HR, EE, FI, DE, HU, IE, IT, LV, LT, LU, MT, NL, PL, PT, RO, SK, SI, ES, SE,), around 40% rely on **internal databases and sample comparison** (AT, BE, HR, EE, FI, FR, DE, HU, IE, IT, LV, LT, LU, MT, NL, PL, PT, RO, SK, SI, ES, SE), while another 30% relies on **national verification platforms** (AT, BE, FI, DE, HU, IE, IT, LV, LT, LU, MT, NL, PT, RO, SK, SI, ES, SE). [22] Several Member States appear across multiple categories, as they combine different verification methods in practice, and approaches may also vary depending on the profession concerned and the specific CA involved. Additionally, others use the **ENIC--NARIC network** (NL) or conduct checks through **embassies and diplomatic channels** (IT). This lack of consistency contributes to uneven decision making and legal uncertainty for applicants.

Fragmentation is even more evident when considering **skills validation**. In non-regulated professions and outside migration frameworks, skills validation is largely left to employers.[23]

[18] Regulated professions database. Regulated Professions by Country, with Competent Authorities. Available at: Regulated Profession Database.
[19] Regulated professions database. Regulated Professions by Country, with Competent Authorities. Available at: Regulated Profession Database. EMN-OECD (2024), Labour migration in times of labour shortages. Available at link.
[20] European Commission. (2023). Commission Recommendation (EU) 2023/2611 of 15 November 2023 on the recognition of qualifications of third-country nationals. Official Journal of the European Union, L 2023/2611. Available at: eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=intcom:C%282023%297700
[21] European Commission. (2023). Commission Recommendation (EU) 2023/2611 of 15 November 2023 on the recognition of qualifications of third-country nationals. Official Journal of the European Union, L 2023/2611. Available at: eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=intcom:C%282023%297700;
[22] Survey targeted at CAs, Q14: "How does your authority check the authenticity of documents?" n=190
[23] Focus Group on information and support to TCNs with ENIC NARIC centres, PES and CSOs (n=28); survey targeted at ENIC-NARIC centres, Q4. For each of the following groups, please indicate the role of your NARIC centre regarding qualifications of TCNs: Higher education institutions, Vocational education and training (VET) institutions, Employers, Professional regulators / competent authorities,

Skills acquired through informal and non-formal learning, including volunteering, community work, or professional experience, often remain invisible within current recognition systems, which are rarely designed to adopt a "skills-first" approach.[24] This invisibility is particularly pronounced for TCNs, whose diverse educational and professional backgrounds make it harder to identify and validate their full range of skills.[25] Yet these skills are essential to provide a comprehensive picture of an individual's potential and to ensure better matching between talent and labour market needs. At present, **validation of non-formal and informal learning is partial and inconsistent**, often handled on a **case-by-case basis** due to the absence of a clear regulatory framework.[26] Without common benchmarks or standardised assessment criteria, outcomes depend heavily on employer discretion, organisational practices, and familiarity with foreign training systems.[27] The **Council Recommendation on the validation of non-formal and informal learning**[28] encourages Member States to establish national systems aimed at making these skills more visible, but implementation remains uneven, with only some Member States having dedicated national frameworks or guidelines to validate skills (AT, BG, CZ, DK, FI, FR, HU, IE, IT, LT, LU, LV, MT, NL, PT).[29] Even in cases where such a framework or guidelines exist, they differ deeply from one Member State to another (ranging from formal validation of skills application processes such as in FR, to competence-based assessments and tests existing in CZ and LV, and scale-point systems in AT and MT) (see Annex 8. and Annex 9. for further details). Without clear mechanisms to assess and validate skills, TCNs frequently face barriers (e.g. language differences and discrimination) that prevent them from effectively showcasing their abilities, leading to skill mismatches and overqualification, where highly educated individuals accept jobs below their qualification level.[30] Moreover, targeted validation initiatives for TCNs and specific groups of migrants (e.g. asylum seekers, refugees) are not systematically embedded in national validation frameworks but only available as part of temporary funded projects.[31] Indeed, only in few Member States (DE, FI, NL, SE) arrangements are available to all migrants and refugees while in 11 Member States (BE, CY, CZ, EL, ES, FR, HU, IE,

Labour migration / employment authorities" (n=18); Focus group on attracting talent with HR departments and talent partnerships stakeholders (n= 27); Cedefop (2023). European inventory of validation of informal and non-formal learning 2023. Available at: https://data.europa.eu/doi/10.2801/64271 Bilateral meetings between the European Commission and Member States on the recognition of qualifications of third country nationals. EU Commission (2023) 'Communication on Skills and Talent Mobility'. Pp. 11-13. Available at: https://commission.europa.eu/document/download/b8c2d90f-17b1-4a10-b91c-4aa536cd2103_en?filename=COM_2023_715_1_EN.pdf;

[24] EU Commission (2023) 'Communication on Skills and Talent Mobility'. Available at: https://commission.europa.eu/document/download/b8c2d90f-17b1-4a10-b91c-4aa536cd2103_en?filename=COM_2023_715_1_EN.pdf

[25] EU Commission (2023) 'Communication on Skills and Talent Mobility'. Available at: https://commission.europa.eu/document/download/b8c2d90f-17b1-4a10-b91c-4aa536cd2103_en?filename=COM_2023_715_1_EN.pdf

[26] internal source gathering evidence on the recognition of qualifications of TCNs provided by DG EMPL. *See also* European Commission: Directorate-General for Migration and Home Affairs, Kantar Public, Milieu Consulting, PwC and Ramboll Management Consulting (2023). Study in support of the impact assessment on the development of an EU talent pool – Final report, Publications Office of the European Union. Available at: https://data.europa.eu/doi/10.2837/670902

[27] Targeted interview from 2 IOs, 2 HR departments

[28] Council Recommendation of 20 December 2012 on the validation of non-formal and informal learning. Available at: EUR-Lex - 32012H1222(01) - EN - EUR-Lex

[29] Cedefop (2023). European inventory of validation of informal and non-formal learning 2023. Available at: https://data.europa.eu/doi/10.2801/64271 Bilateral meetings between the European Commission and Member States on the recognition of qualifications of third country nationals. *See also* EU Commission (2023) 'Communication on Skills and Talent Mobility'. Available at: https://commission.europa.eu/document/download/b8c2d90f-17b1-4a10-b91c-4aa536cd2103_en?filename=COM_2023_715_1_EN.pdf

[30] EU Commission (2023) 'Communication on Skills and Talent Mobility'. Available at: https://commission.europa.eu/document/download/b8c2d90f-17b1-4a10-b91c-4aa536cd2103_en?filename=COM_2023_715_1_EN.pdf

[31] Commission Staff Working Document (2020), Evaluation of the Council Recommendation of 20 December 2012 on the validation of non-formal and informal learning. Available at: link. ETUC (2021), ETUC Position on enhancing validation of non-formal and informal learning. Available at: link.

IT, LU, SK) such measures are limited to project based initiatives.[32] This creates deep variability in the recognition of skills, further aggravating fragmentation of procedures across EU Member States and hindering talent attraction of TCNs.

3.2.1.2 Duplication and inconsistencies of recognition procedures within Member States

Competences over recognition of qualifications of TCNs are often scattered across different levels or bodies of government or sector specific boards of regulated professions (e.g. architects, doctors, engineers), lacking a unified coordinating framework for recognition of qualifications and validation of skills[33] (see Annex 7. for further details). In the absence of effective coordination mechanisms among these various stakeholders, procedures entailing checks on qualifications (e.g. recognition procedures and migration pathways for skilled workers) are often implemented in parallel rather than sequentially or coherently,[34] And are almost never taken into consideration by CAs recognising qualifications.[35], This leads to repeated checks, inconsistent assessments, and fragmented decision making-, while also failing to provide applicants and employers with clear guidance throughout the process and predictability of the recognition and validation outcomes.[36] These challenges are particularly pronounced in decentralised governance systems (e.g. AT, BE, DE, IT), where recognition and validation responsibilities are shared across different levels of government thus leading to high differences within the same Member State with decisions being issued immediately upon submission of documents in some cases, or only after several months in others, as well as differences in terms of outcomes.[37] Duplications and inconsistencies in outcomes of recognition and migration procedures are further exacerbated in Member States where preliminary checks of qualification and skills are conducted as part of migration procedures.[38] Indeed, almost all Member States conduct preliminary checks for residence permits and/or visa linked with various migration pathways (e.g. highly skilled workers, seasonal workers, family reunification) as described in Annex 8.3 **Error! Reference source not found.**, while recognition procedures are handled by

[32] Commission Staff Working Document (2020), Evaluation of the Council Recommendation of 20 December 2012 on the validation of non-formal and informal learning. Available at: link.
[33] Bilateral meetings between the European Commission and Member States on the recognition of qualifications of third country nationals.
[34] European Commission: Directorate-General for Migration and Home Affairs, Kantar Public, Milieu Consulting, PwC and Ramboll Management Consulting, Study in support of the impact assessment on the development of an EU talent pool – Final report, Publications Office of the European Union, 2023, https://data.europa.eu/doi/10.2837/670902 pp: 80-83
[35] Survey targeted at CAs, Q33. Do you take into account prior qualification recognition or skills assessment conducted for migration/residence/work permit purposes in your Member State? (n=190)
[36] Internal source gathering evidence on stakeholder consultation on the recognition of non-EU qualifications held by TCNs provided by DG EMPL.; targeted interviews with six IOs, two ENIC NARIC centres, one PES, two CSOs, three TC authorities, three EU professional organisations, three EU Umbrella organisations of employers, four HR departments
[37] European Commission: Directorate-General for Migration and Home Affairs, Kantar Public, Milieu Consulting, PwC and Ramboll Management Consulting, Study in support of the impact assessment on the development of an EU talent pool – Final report, Publications Office of the European Union, 2023, https://data.europa.eu/doi/10.2837/670902 pp: 80-83; targeted interview with HR AT, ITCILO, IOM. Bilateral meetings between the European Commission and Member States on the recognition of qualifications of third country national; survey targeted at TCNs, Q12: What was the outcome of your application for recognition? (n=183)
[38] Contribution to the call for evidence (ONCD; ECCVT; Fragomen; IOM); European Commission: Directorate-General for Migration and Home Affairs, Kantar Public, Milieu Consulting, PwC and Ramboll Management Consulting, Study in support of the impact assessment on the development of an EU talent pool – Final report, Publications Office of the European Union, 2023, https://data.europa.eu/doi/10.2837/670902 pp: 80-83.

separate bodies under different legal and administrative frameworks.[39] This separation can lead to diverging assessments of the same qualifications or skills,[40] increased uncertainty for applicants, and additional administrative burdens and layers of complexity according to 61% of employers willing to hire TCNs.[41] It also results in unnecessary duplication of procedures for public authorities, undermining efficiency and coherence across the system.[42]

3.2.1.3 Lack of clear and accessible information for TCNs and employers

Even tough almost all Member States have information mechanism in place to provide TCNs with relevant information on national recognition procedures (see Annex 8. [43] these rarely provide comprehensive and detailed information on the recognition and validation process requirements and outcomes.[44] More generally, with regard to recognition, TCNs face difficulties in identifying whether a profession is regulated, and in determining the CA responsible for qualification recognition, particularly in systems where regulation varies across regions within the same Member State.[45] In fact, while the majority of TCNs (60,9%) highlighted that official government websites represent the main source to retrieve information regarding recognition of qualification procedures,[46] information regarding the requirements for recognition is only somewhat clear according to the majority of TCNs

[39] European Commission: Directorate-General for Migration and Home Affairs, Kantar Public, Milieu Consulting, PwC and Ramboll Management Consulting, Study in support of the impact assessment on the development of an EU talent pool – Final report, Publications Office of the European Union, 2023, https://data.europa.eu/doi/10.2837/670902; Internal source gathering evidence on stakeholder consultation on the recognition of non-EU qualifications held by TCNs provided by DG EMPL; Targeted interviews with one IO, One professional organisation and one HR department.

[39] Internal source gathering evidence on stakeholder consultation on the recognition of non-EU qualifications held by TCNs provided by DG EMPL.

[40] Survey targeted at TCNs, Q12: "What was the outcome of your application for recognition?" (n=183)

[41] European Commission: Directorate-General for Migration and Home Affairs, Kantar Public, Milieu Consulting, PwC and Ramboll Management Consulting, Study in support of the impact assessment on the development of an EU talent pool – Final report, Publications Office of the European Union, 2023, https://data.europa.eu/doi/10.2837/670902 pp: 80-83; Focus group on attracting talent with HR departments and talent partnerships stakeholders (n= 27);

[42] European Commission: Directorate-General for Migration and Home Affairs, Kantar Public, Milieu Consulting, PwC and Ramboll Management Consulting, Study in support of the impact assessment on the development of an EU talent pool – Final report, Publications Office of the European Union, 2023, https://data.europa.eu/doi/10.2837/670902; internal source gathering evidence on the recognition of qualifications of TCNs provided by DG EMPL;.Targeted interviews with three IOs, one CSO; Focus Group on labour migration with migration authorities and IOs (n=28); Focus Group with TCNs (n=12); Contribution to the call for evidence (Fragomen).

[43] Survey targeted at TCNs : Q10. Where did you look for information about the recognition of qualifications? (Select all that apply) (n=253); Survey targeted at NARIC centres, Q20. "To what extent are the following mechanisms used to provide information to TCNs?" (n=18) Answers: dedicated website (to a large extent: 1, to a moderate extent: 3, to a small extent: 8, not at all: 8), Email support (to a large extent: 10, to a moderate extent: 5, to a small extent: 3, not at all: 0), Telephone support (to a large extent: 8, to a moderate extent: 6, to a small extent: 2, not at all: 2), In-person consultations (to a large extent: 4, to a moderate extent: 4, to a small extent: 2, not at all: 8), Written guidance or FAQs (to a large extent: 6, to a moderate extent: 7, to a small extent: 2, not at all: 3), Targeted web pages for TCNs (to a large extent: 1, to a moderate extent: 3, to a small extent: 8, not at all: 8).

[44]Survey targeted at TCNs, Q11. How clear was the information you found about the requirements for recognition? (n=253); PC analysis Annex 10. . Q46. "How clear was the information you found about the requirements for getting your skills validated?" (n=63); answers: Other (please specify below): 1; I didn't look for information: 7; Employer or recruiter: 14; Friends/family or informal networks: 14; Recognition authorities / contact points: 15; Professional organisations or unions: 18; Social media or online forums: 22; EU websites (e.g. Your Europe, Europass): 37; Official government websites: 42; PC analysis Annex 10. Q36 "How clear was the information you found about the requirements for recognition?" (n=84); answers: Very clear: 18; Somewhat clear: 43; Not clear: 17; Not available / I couldn't find them: 0.

Bilateral meetings between the European Commission and Member States on the recognition of qualifications of third country nationals. Focus Group with TCNs (n=12); Focus Group on information and support to TCNs with ENIC NARIC centres, PES and CSOs (n=28); Targeted interviews with three IOs, two EU professional organisation, one PES, and three CSOs, one HR department; Focus Group with TCNs (n=12); Contribution to the call for evidence (Taflan GmbH; ZDH).

[45] Focus Group with TCNs (n=12); Focus Group on information and support to TCNs with ENIC NARIC centres, PES and CSOs (n=28); Targeted interviews with three IOs, two EU professional organisation, one PES, and three CSOs, one HR department; Focus Group with TCNs (n=12)

[46] Survey targeted at TCNs : Q10. Where did you look for information about the recognition of qualifications? (Select all that apply) (n=253)

(53%), with an additional 21,3% indicating that it is not clear at all (see Annex 8. [47] Also, employers and small and medium-sized enterprises (SMEs) in particular, may encounter difficulties in retrieving information regarding the procedures for recruiting workers from outside the EU.[48]

In a similar manner, information on skills acquired in another Member State are incomplete and unprecise, often raising concerns about the reliability of available data and hindering their validation.[49] This is linked to the differing national approaches to the validation of skills (see Annex 9. on validation)**,** in a context where **no common European approach for information sharing** exists.

3.2.2 Driver 2: Complex and burdensome administrative procedures for recognition

3.2.2.1 Lengthy and untransparent administrative procedures

In terms of length, CAs consulted through survey confirmed that only in few cases recognition decisions for access to regulated professions are undertaken in one month, while the majority of CAs highlighted that TCNs receive a final outcome on their recognition procedures **between 1 and 3 months (40%) or 3 and 6 months (36%)** after the beginning of the process (see Annex 8.2.5 in Annex 7.).[50] However, estimates of the actual length of the full recognition process — as experienced by applicants, from the gathering of documents to the final outcome — are around **14.2 months** (see Annex 4.5). This applicant-perspective figure relates to recognition in the context of regulated professions and is distinct from the narrower competent-authority perimeter, which runs from a complete application to a first decision and on which the 1-to-6-month timelines reported above are measured. TCNs confirmed that the duration of recognition processes is long,[51] lasting between 1 and 3 months according to 18,8% of respondents, but with a 36,3% indicating the length of recognition processes of over one year (see Annex 8.3.5 [52] Moreover, the majority of TCNs (70,4%) responding to the survey consider the length of the recognition process either as a big (27,3%) or a very big (43,1%) problem.[53] However, these timelines must be interpreted in light of existing access requirements. In several Member States (AT, BE, DE, EE, ES, FR,

[47] Survey targeted at TCNs, Q11. How clear was the information you found about the requirements for recognition? (n=253)
[48] Targeted interviews with two EU umbrella organisations of employers, three HR departments and one EU level representative body;- PC analysis Annex 10. , Q24 “To what extent do you consider the following challenges related to skills portability in the EU to be a problem?” (n=486); PC analysis Annex 10. . Q25 “Do you think there are other issues that make it harder for people to have their skills and qualifications understood, recognised and valued in another country?” (n=486); Focus Group on attracting talent with HR departments and talent partnerships stakeholders (n= 27)
[49] Internal source provided by DG EMPL (action 1)
[50] Survey targeted at CAs, Q16: “In your experience, what is the average timeline from complete application to decision for third-country nationals?” n=190
[51] Focus Group with TCNs (n=12); PC analysis Annex 10. . Q26 “Have you had any personal experiences with any of these challenges, for example, when applying for jobs in a different country, recruiting people from another country or dealing with the recognition of qualifications or validation of skills?” (n=98), open response; targeted interviews with two CSOs, two IOs, one HR department, one professional organisation, five CAs from third countries.
[52] Survey targeted at TCNs. Q13. How long did the recognition process (receiving a decision or final outcome)? (n=160)
[53] Survey targeted at TCNs “ Q8: To what extent do you consider the following challenges related to skills portability in the EU to be a problem? Recognition processes for accessing a regulated profession in another country are often lengthy, complex and costly.” (n=253)

HR, LT, MT, NL, PT, RO, SI)[54] access to recognition procedures is conditional upon obtaining a third-party recognition statement (e.g. from ENIC-NARIC centres) (see Annex 8.). Processing times for such statements vary substantially, typically ranging from around one month (22 out of 90 responses – EE, IT, LV, LT, NL)[55] to up to three months (23 out of 90 responses – BG, FI, FR, SI, SE).[56] Where required, this introduces an additional delay of approximately one to three months in overall recognition timelines.

Final outcomes often remain uncertain.[57]This is reflected in the fact that 44,8% of TCNs did not obtain full recognition. Indeed, 23,5% received only partial recognition and were required to complete compensation measures; 11,5% withdrew their application due to the excessive length and cost of the procedure; 9,8% did not obtain recognition, while another 9,8% was still awaiting a decision, further underlining the persistent duration of recognition procedures (for further details see Annex 8. [58]

Obviously, there are substantial differences depending on the sector considered. For regulated professions, particularly in the healthcare sector, the length of recognition processes is significantly higher, as further detailed Annex 8.2.5 .[59]

The lack of predictability is itself a barrier. Applicants are often unable to anticipate the duration of a procedure, while employers cannot reliably plan recruitment around recognition timelines. For TCN in particular, the unpredictability of timelines can have cascading effects: where recognition outcomes determine whether a work permit can be issued or renewed, delays translate directly into loss of income, prolonged administrative limbo, and in some cases forced return.[60] TCN described procedures lasting several years, prolonged periods of administrative silence, and the absence of predictable timelines or service level standards. Some testimonies linked long procedures to forced professional inactivity (15,5%), delayed careers (13,4%), and prolonged dependency on precarious employment (15,5%).[61] Hospitals and other employers report situations where qualified professionals are legally present but unable to work, or unable to work at their skill level, while awaiting

[54] Survey targeted at CAs, Q10: “Which documents are typically required from third-country applicants? (Select all that apply)” (n=190)
[55] Survey targeted at ENIC NARIC centres, Q10. What is the average time from receipt of a complete application to decision for a TCN? (n=18) Answer “About one month” reported by 6 out of 18 NARIC centres for the recognition for further learning, 4 out of 18 for regulated professions, 5 out of 18 for non-regulated professions, 2 out of 18 for validation of skills and 5 out of 18 for the issuing of comparability statements.
[56] Survey targeted at ENIC NARIC centres, Q10. What is the average time from receipt of a complete application to decision for a TCN? (n=18), Answer “between 1 and 3 months” reported by 3 out of 18 NARIC centres for the recognition for further learning, 7 out of 18 for regulated professions, 7 out of 18 for non-regulated professions, 1 out of 18 for validation of skills and 5 out of 18 for the issuing of comparability statements
[57] Focus Group with TCNs (n=12); PC analysis Annex 10. Q26 “Have you had any personal experiences with any of these challenges, for example, when applying for jobs in a different country, recruiting people from another country or dealing with the recognition of qualifications or validation of skills?” (n=98), open response; targeted interviews with two CSOs, two IOs, one HR department, one professional organisation, five CAs from third countries.
[58] Survey targeted at TCNs : Q12. “What was the outcome of your application for recognition?” (n=183)
[59] Targeted interviews with professional organisations. EMN, 2024. Ad-Hoc Query 2024.16 on Recognition of third-country qualifications for the profession of doctor with basic medical training
[60] Bilateral meetings between the European Commission and Member States on the recognition of qualifications of third country nationals; Internal source gathering evidence on stakeholder consultation on the recognition of non-EU qualifications held by TCNs provided by DG EMPL; Internal source gathering evidence on the recognition of qualifications of TCNs provided by DG EMPL; Survey Targeted at migration authorities, Q16: “What is the typical additional processing time attributable to skills or qualification checks?” (n=48): 24 migration authorities indicate the existence of additional processing time attributable to qualification or skills checks within migration procedures, approximately equal to less than two weeks (6), 2-6 weeks (4), 6-12 weeks (12), more than 12 weeks (2), not available (50%); Focus Group on labour migration with Migration Authorities and IOs (n=28)
[61] Survey targeted at TCNs :Q19: How did the process or outcome of the recognition decision affect you? (Select all that apply) (n=253)

recognition decisions required to activate or maintain their work permit.[62] This not only provides additional complexity, but unpredictability may prevent the fulfilment of requirements for the recognition process, including the ability to complete adaptation measures required by CAs (HR, IE, PL), or the rejection of talent-visa applications for reasons related to visa-requirements (SE).[63]

The misalignment between recognition and migration procedures intensifies these delays . 83,7% of surveyed CAs across almost all Member States (AT, BE, EE, ES, FI, FR, HR, HU, IE, IT, LT, LV, MT, NL, PL, PT, RO, SE, SI, SK) declared that they do not consider previous qualification and skills assessment conducted during migration processes.[64] Misalignment of migration and qualification recognition procedures also means that since in the majority of cases the recognition process cannot be undertaken from abroad, TCN professionals may struggle and have to find creative solutions to obtain the legal residence required in the receiving country to undergo the recognition process[65] (see Annex 8.

In the public consultation, stakeholders caution that simplification should not be equated with speed alone, as equivalence assessments require substantive technical judgement at national level (see Annex 10.).[66] Stakeholders therefore see EU added value primarily in procedural convergence, clear sequencing, reusable outcomes and timelines, without harmonising standards.[67]

3.2.2.2 Burdensome documentation and translation requirements

All **Member States' CAs responsible for the access to several regulated professions that responded to the survey require on average over 6 different documents and certificates to be submitted in original paper form** (see Annex 8.2.3),[68] higher than the average required for EU citizens lying at about 5 documents, which is already considered a burdensome threshold.[69] In addition, CAs from all Member States require **certified**

[62] Bilateral meetings between the European Commission and Member States on the recognition of qualifications of third country nationals; Internal source gathering evidence on stakeholder consultation on the recognition of non-EU qualifications held by TCNs provided by DG EMPL; Internal source gathering evidence on the recognition of qualifications of TCNs provided by DG EMPL; Survey Targeted at migration authorities, Q16 ". What is the typical additional processing time attributable to skills or qualification checks?" (n=48): 24 migration authorities indicate the existence of additional processing time attributable to qualification or skills checks within migration procedures, approximately equal to less than two weeks (6), 2-6 weeks (4), 6-12 weeks (12), more than 12 weeks (2), not available (50%); Focus Group on labour migration with Migration Authorities and IOs (n=28)

[63] Bilateral meetings between the European Commission and Member States on the recognition of qualifications of third country nationals; internal source gathering evidence on the recognition of qualifications of TCNs provided by DG EMPL; Internal source gathering evidence on stakeholder consultation on the recognition of non-EU qualifications held by TCNs provided by DG EMPL;

[64] Survey targeted at CAs, Q33. Do you take into account prior qualification recognition or skills assessment conducted for migration/residence/work permit purposes in your Member State? (n=190)

[65] Focus Group on labour migration with migration authorities and IOs (n=28)

[66] Contribution to the call for evidence (COLEF).

[67] Contribution to the call for evidence (IOM; Confederation of Danish Employers).

[68] Survey targeted at CAs, Q10: "Which documents are typically required from third-country applicants?"; Survey targeted at CAs, Q11: "What formal requirements must third-country nationals fulfil when submitting their documents?" (n=190)

[69] The average number of documents required was estimated using the distribution of respondents across document-range categories reported in a **survey targeted at citizens for the 2025 Implementation Report** (question: *"What was the number of documents that you had to provide during the recognition process?"*, **n = 451**). The three response categories (0–5 documents, 5–10 documents, and more than 10 documents) were converted into a single average by assigning each category a representative value and computing a weighted mean. Specifically, we used the midpoint for the closed intervals (2.5 for 0–5; 7.5 for 5–10) and 12.5 as a conservative representative value for the open-ended category ("more than 10"). Each representative value was then weighted by the share of respondents in that category (43%, 34.3%, 16.9%) and summed, yielding an estimated average of **approximately 5.8 documents per respondent**. As with any grouped-data approximation, the estimate is sensitive to the assumption used for the open-ended upper category, but it provides a

translations either systematically (or in specific cases only, most commonly when documents are not issued in the official language of the Member State assessing the qualification or in English (see Annex 8.2.3).[70]

Evidence further suggests that, throughout the application process for qualifications recognition, **CAs may request additional documents or proof that TCNs do not immediately possess** (see Annex 8.2.3 for further details). Obtaining such evidence often requires contact with national administrations or training institutions in their country of origin, which is usually time-consuming and sometimes even impossible (e.g. for refugees).[71]

Additional requirements imposed by national CAs, such as in person-verification or physical document submission, can be particularly burdensome for TCNs living abroad, especially where no legal pathway exists for entry into the Member State for the purpose of seeking recognition.[72] As a matter of fact, these requirements disproportionately affect more vulnerable groups, notably refugees, asylum seekers awaiting decisions, as well as migrants who fled under emergency conditions and may lack complete original documentation and any practical means to retrieve it from their country of origin[73] (see Annex 8.2.7 for further information). Lastly, while all Member States consulted accept digital and verifiable credentials (AT, BE, HR, EE, FI, FR, DE, HU, IE, IT, LV, LT, LU, MT, NL, PL, PT, RO, SK, SI, ES, SE),[74] access to national digital procedures may require a national eID or in-person identity verification which TCNs may lack. Moreover, only some Member States have fully (AT, BE, EE, ES, FI, FR, IE, IT, MT, PT, SE) or mostly (LT, LU, LV, NL) digitalised procedures, thus pointing to an overall burdensome and lengthy recognition process for TCNs (see Annex 8.2.6).[75]

3.2.2.3 High and unclear costs

Costs associated with qualification recognition procedures encompass application fees, translation and legalisation requirements, and compensation measures, including fees for examinations, mandatory training, and bridging courses.[76] These costs **can be both high and difficult to anticipate**. As a matter of fact, a majority of TCNs (70,4%) consider the

transparent and consistent way to summarise the distribution into a single headline figure.; European Commission, Commission Staff Working Document SWD accompanying the document Report on the implementation of Directive 2005/36/EC, SWD(2026) 64 Final. Pp. 25

[70] Survey targeted at CAs, Q12: "When are certified translations required?" (n=190). Answers: Always: 58,4%; Sometimes: 28,4%; Never: 13,2%; European Commission - Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs (2011). Evaluation of the Professional Qualifications Directive (Directive 2005/36/EC)

[71] European Commission - Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs (2011). Evaluation of the Professional Qualifications Directive (Directive 2005/36/EC); targeted interviews with three IOs, two CSOs, one CA from a third-country, one HR Department; Contribution to the call for evidence (IOM; ENSIE).

[72] Targeted interviews with three IOs, two CSOs, one HR department, one professional organization, two CAs in third country; [72] SOLIDAR (2023), The European Commission's Recommendation on Recognition of Qualifications of Third-Country Nationals, Briefing Paper #107 Available at: link

[73] SOLIDAR (2023), The European Commission's Recommendation on Recognition of Qualifications of Third-Country Nationals, Briefing Paper #107 Available at: link; European Commission - Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs (2011). Evaluation of the Professional Qualifications Directive (Directive 2005/36/EC); targeted interviews with two IOs;

[74] Survey targeted at CAs, Q11: "What formal requirements must third-country nationals fulfil when submitting their documents?" (n=190)

[75] Survey targeted at CAs, Q18: "To what extent can third country nationals complete the recognition process using digital procedures (i.e. without in-person or paper-based steps)?" (n=190)

[76] Bilateral meetings between the European Commission and Member States on the recognition of qualifications of third country nationals. European Commission: Directorate-General for Migration and Home Affairs, Kantar Public, Milieu Consulting, PwC and Ramboll Management Consulting (2023). Study in support of the impact assessment on the development of an EU talent pool – Final report, Publications Office of the European Union. Available at: https://data.europa.eu/doi/10.2837/670902 ; targeted interviews with one IO

recognition processes as too costly, representing either a big (27,3%) or very big (43,1%) problem.[77] Moreover, applicants often struggle to identify all the necessary procedural steps for qualification recognition in advance, consequently failing to clearly acknowledge all financial implications of the recognition process.[78] This lack of clarity is aggravated by initially unforeseen obligations, (e.g. translation obligations, in-person procedures) that may be inaccessible or particularly burdensome for applicants residing abroad.[79]

The level of application fees shows extreme variation across Member States and professions, ranging from no fees at all to charges exceeding €2000, with an average lying at around €150 (see Annex 4.1 and Annex 8.2.5).[80] Health professions, and in particular medical doctors and dentists, are consistently associated with the highest financial burden, with fees above €1,000 reported in several Member States (HR, FI, NL, SE).[81]

Moreover, during the application process **additional costs may arise**, such as authentication or legalisation of documents in 16 Member States (AT, DE, EE, ES, FI, HR, HU, IE, IT, LV, MT, NL, PL, PT, RO, SI), as well as expenses associated with additional training, examinations, or tests required as part of compensation measures[82] (see Annex 8.2.5). For examples, costs for translation and legalisations of documents, are subject to substantial variations, with average amounts of respectively €200 and €150 across the different Member States (see Annex 4.1 and Annex 8.2.5).

Language barriers further increase the financial burden and the overall length of recognition and validation procedures.[83] In many Member States (AT, DE, EE, FI, HR, LV, NL, PL, SI), particularly in the healthcare and education sectors, proof of language proficiency is mandatory, often requiring applicants to pay separate additional fees for language tests and training.[84] Several Member States (AT, DE, HT, LV, PL, SE) also reported a limited availability of language support for TCNs, resulting in additional out-of-pocket expenses and further constraining access to the recognition procedure.[85]

[77] Survey targeted at TCNs "Q8: To what extent do you consider the following challenges related to skills portability in the EU to be a problem? Recognition processes for accessing a regulated profession in another country are often lengthy, complex and costly." (n=253)
[78] PC analysis Annex 10. Q36 "How clear was the information you found about the requirements for recognition?" (n=84); Answers: Very clear: 18; Somewhat clear: 43; Not clear: 17; Not available / I couldn't find them: 0. PC analysis Annex 10. Q47. "How clear was the information you found about the requirements for getting your skills validated?" (n=63); Answers: Very clear: 15; Somewhat clear: 19; Not clear: 23; Not available/ I couldn't find any: 6.
Targeted interviews at two CSOs, two IOs; Focus Group with individual TCNs (n=12); Focus Group on information and support to TCNs with ENIC NARIC centres, PES and CSOs (n=28)
[79] Bilateral meetings between the European Commission and Member States on the recognition of qualifications of third country nationals. European Commission: Directorate-General for Migration and Home Affairs, Kantar Public, Milieu Consulting, PwC and Ramboll Management Consulting (2023). Study in support of the impact assessment on the development of an EU talent pool – Final report, Publications Office of the European Union. Available at: https://data.europa.eu/doi/10.2837/670902 ; targeted interviews with one IO
[80] Survey targeted at CAs, Q17. "What type of costs are typically incurred by third country nationals for recognition of qualifications?" (Select all that apply) (n=190)
[81] Survey targeted at CAs, Q17. "What type of costs are typically incurred by third country nationals for recognition of qualifications?" (Select all that apply) (n=190); EMN, 2024. Ad-Hoc Query 2024.16 on Recognition of third-country qualifications for the profession of doctor with basic medical training.
[82] Survey targeted at CAs, Q17. "What type of costs are typically incurred by third country nationals for recognition of qualifications?" (Select all that apply) (n=190)
[83] Targeted interview with one professional organisation
[84] Bilateral meetings between the European Commission and Member States on the recognition of qualifications of third country nationals.
[85] Bilateral meetings between the European Commission and Member States on the recognition of qualifications of third country nationals. internal source gathering evidence on the recognition of qualifications of TCNs provided by DG EMPL; Internal source gathering evidence on stakeholder consultation on the recognition of non-EU qualifications held by TCNs provided by DG EMPL; Targeted interview with two IOs and one professional organisation

3.2.3 Driver 3: Lack of trust and understanding of qualifications and skills obtained in third countries[86]

3.2.3.1 Concerns over authenticity of documents issued in third countries

Concerns over the authenticity of documents issued in third countries constitute a challenge for national CAs in charge of recognition processes. Indeed, most consulted CAs (i.e. 60,0%) (AT, BE, HR, EE, FI, FR, DE, HU, IE, IT, LV, LT, LU, MT, NL, PL, PT, RO, SK, ES, SE) identified **verifying authenticity of TCQs as one of the main challenges**.[87] This result was corroborated by 16 out of 18 consulted ENIC-NARIC centres (IE, DK, RO, SE, EL, BE, NO, FI, ES, FR, LT, HU, BG, LV, NL).[88] Indeed, several national CAs stress that they face particular difficulties in verifying authenticity of qualifications from countries with weak administrative systems or conflict zones, including Syria, African countries, Ukraine, Belarus, Russia, or countries with whom it is hard to build trustful relationships because of a lack of alignment of qualifications, such as India, Brazil, Mexico, and the Philippines.[89] Moreover, several Member States reported evidence of fraudulent documents and diploma mills (BE, DE, EE, ES, IE, LV, SK).[90]

Concerns about the authenticity of documents supporting recognition processes were also confirmed by several NARIC centres and recognition bodies consulted in third countries, which reported receiving numerous support requests related to the verification of documents submitted for recognition in Member States.[91]

3.2.3.2 Insufficient knowledge about third-country educational systems, curricula and standards

National authorities often struggle to interpret and compare TCQs as well as the type of professional activities performed by TCNs in third countries, due to **limited knowledge of third-country education and training systems**.[92] The delays associated with such information barriers make the recognition and, as a consequence, the recruitment process lengthier and more burdensome and cause distrust of employers for the qualifications possessed by TCNs.[93] Indeed, several Member States (AT, DE, FR, ES, PL,

[86] Additional evidence related to Driver 3 will be presented in the final report, as the short timeframe between the agreement on amendments with DG EMPL and the submission of this document limited the inclusion of further supporting analysis.
[87] Survey targeted at CAs, Q28: "What challenges do you encounter when assessing TCQs?" n=190
[88] Survey targeted at ENIC-NARIC centres, Q26: "What are the main challenges your NARIC centre faces in recognising qualifications or validating skills of TCNs?" n=18.
[89] Bilateral meetings between the European Commission and Member States on the recognition of qualifications of third country nationals; Focus Group on access to regulated professions with CAs of electricians and crane operators (n=20); Focus Group on information support to TCNs with ENIC NARIC centres and PES (n=37)
[90] Bilateral meetings between the European Commission and Member States on the recognition of qualifications of third country nationals.
[91] Targeted interviews with 15 TC authorities
[92] Focus Group on information and support to TCNs with ENIC NARIC centres, PES and CSOs (n=37); Focus Group on access to regulated professions with CAs of electricians and crane operators (n=20); Focus Group with CAs in the healthcare sector (n=31)
[93] Internal source gathering evidence on the recognition of qualifications of TCNs provided by DG EMPL. *See also* European Commission: Directorate-General for Migration and Home Affairs, Kantar Public, Milieu Consulting, PwC and Ramboll Management Consulting (2023). Study in support of the impact assessment on the development of an EU talent pool – Final report, Publications Office of the European Union. Available at: https://data.europa.eu/doi/10.2837/670902

SK) reported a high degree of discrepancy between the EU and third-country education and training standards which hinder the assessment.[94]

Beyond national authorities, **employers also experience challenges when assessing and validating skills obtained in third countries**, due to a substantial failure in fully understanding the formal qualifications and informal skills acquired in third countries.[95] In fact, the assessment of skills possessed by candidates often happens directly during the recruitment procedure (e.g. through in-house, specific methods) in order to evaluate whether the candidate's skills align with the organisation's needs and job requirements. Particularly when it comes to SMEs, employers lack knowledge and understanding of learning objectives of foreign curricula, which often leads to the exclusion of TCNs candidates.[96] Moreover, language barriers further hinder the assessment of non-formal and informal skills held by TCNs, as evaluations are frequently conducted in the language of the host Member State, which many TCNs do not fully master, thereby constraining their ability to adequately demonstrate the breadth and depth of their acquired skills.[97]

3.2.3.3 Doubts about efficacy of QA within third-country systems

Member States highlighted that the lack of trust of qualifications obtained in third countries is further reinforced by the **insufficient or unreliable information on QA systems in third countries**, **uncertainty among recognition bodies** when evaluating TCQs, and **concerns regarding the consistency and credibility of issuing institutions and qualification systems**.[98] Nonetheless, this trust deficit is not primarily driven by demonstrable shortcomings in third-country education and training, but rather by persistent informational barriers: CAs and employers frequently lack access to standardised, verifiable and operational information on curricula, learning outcomes and accreditation arrangements, leading to reliance on case-by-case document scrutiny rather than systemic confidence.[99]

These issues persist even where formal QA or qualifications framework arrangements are in place, suggesting that the **existence of frameworks alone is not sufficient to generate trust**.[100] PC responses indicate that, in the absence of shared reference points or cumulative institutional knowledge, QA arrangements in third countries are often assessed in isolation,

[94] Bilateral meetings between the European Commission and Member States on the recognition of qualifications of third country nationals.
[95] Bilateral meetings between the European Commission and Member States on the recognition of qualifications of third country nationals. European Commission: Directorate-General for Employment, Social Affairs and Inclusion and ECORYS, *Study on obstacles to recognition of skills and qualifications – Final report*, Publications Office, 2017, https://data.europa.eu/doi/10.2767/968470 ; European Commission: Directorate-General for Migration and Home Affairs, Kantar Public, Milieu Consulting, PwC and Ramboll Management Consulting, Study in support of the impact assessment on the development of an EU talent pool – Final report, Publications Office of the European Union, 2023, https://data.europa.eu/doi/10.2837/670902; targeted interviews with three HR departments and one IO
[96] Targeted interviews with three HR departments and one IO
[97] Targeted interviews with two IOs
[98] European Training Foundation. (2025). Qualification data needs to support recognition of non-EU country vocational qualifications. Available at: Recognition of qualifications.pdf; European Training Foundation. (2024). Better recognition of qualifications. Available at: Recognition of qualifications.pdf; targeted interviews with two IOs
[99] Contribution to the call for evidence (Taflan GmbH; ZDH; ONCD); PC analysis Annex 10. Q25 "Do you think there are other issues that make it harder for people to have their skills and qualifications understood, recognised and valued in another country?" (n=486); Answers: Yes 49,6%; No: 50,4%.
[100] European Training Foundation. (2025). Qualification data needs to support recognition of non-EU country vocational qualifications. Available at: Recognition of qualifications.pdf; targeted interviews with one CA from third countries; Focus Groups on automatic recognition with QA bodies (n=25)

without benefiting from learning effects across cases. This contributes to repeated reassessment of similar qualifications and limits the development of stable recognition practices over time.[101] In particular, trust failures are most acute in regulated professions with minimum training requirements, such as healthcare, where concerns extend beyond formal accreditation to the effective functioning of training systems, supervision mechanisms and enforcement. In these sectors, recognition is framed not only as a matter of educational comparability, but as a proxy assessment of public-interest safeguards, reinforcing a precautionary stance.[102]

Additionally, evidence from the survey targeted at CAs shows that a majority of respondents express only **limited trust in TCQ evidence**, with a 60,5% of CAs consulted reporting trusting evidence and documents related to TCQs only to a moderate (51,1%) or low (8,8%) extent.[103] This pattern indicates that trust deficits are widespread rather than exceptional and directly affect the way recognition applications are assessed. Furthermore, informational uncertainty translates into conservative decision-making logics: where authorities cannot reliably interpret the quality and scope of training, they tend to favour extensive documentation requirements, curriculum-based comparisons and repeated verification, even when applicants' professional experience or labour-market demand would justify more proportionate approaches.[104]

As a result, doubts about QA effectiveness continue to influence recognition practices, often leading to more cautious, resource-intensive, or fragmented recognition outcomes, with implications for both CAs and applicants.[105] **Capacity constraints within CAs** are also considered a substantial compounding factor, with limited trust in QA systems pushing authorities toward conservative evaluation practices that are difficult to sustain at scale, particularly under conditions of increasing inflows of third-country professionals.[106]

3.3 What are the consequences?

The challenges in recognition of qualifications and validation of skills for TCNs hamper both international and upward labour mobility of TCNs in the EU. This, in turn, results in **limited global competitiveness of the EU single market, an EU economy which is less resilient and at higher risk of productivity loss, with high incidence of labour and skills shortages in critical sectors**. The "brain waste" resulting from qualification recognition inefficiencies hampers the EU's ability to match labour supply with demand in key sectors (e.g. healthcare, Information and Communication Technology (ICT), construction) and ultimately diminishes its ability to attract and retain global talent.[107] Overall, this compromises the EU economy's ability to compete with other global players, especially

[101] Contribution to the call for evidence (Taflan GmbH).
[102] Focus Groups on automatic recognition with QA bodies (n=25); Contribution to the call for evidence (Taflan GmbH).
[103] Survey targeted at CAs, Q15: "To what extent do you trust evidence and documents related to TCQs?" n=190
[104] Contribution to the call for evidence (ONCD; ZDH).
[105] European Training Foundation. (2025). Qualification data needs to support recognition of non-EU country vocational qualifications. Available at: Recognition of qualifications.pdf; European Training Foundation. (2024). Better recognition of qualifications. Available at: Recognition of qualifications.pdf
[106] Focus Groups on automatic recognition with QA bodies (n=25)
[107] Mario Draghi (2024). *A competitiveness strategy for Europe*. Available at: https://commission.europa.eu/topics/eu-competitiveness/draghireport_en#:~:text=Read%20Mario%20Draghi%27s%20report%20on%20the%20future%20of,on%20how%20Europe%20can%20boost%20its%20economic%20growth.

considering pressing challenges such as demographic decline, with many TCNs preferring to migrate to more competitive countries like Canada or Australia. Research indicates that TCNs constitute a substantial portion of key workers in essential roles, particularly in sectors such as health and long-term care, which have been highlighted during the COVID-19 pandemic.[108]

As a result of complex and cumbersome recognition procedures and unclear frameworks for validation of skills, **TCNs tend to avoid considering EU Member States, and more broadly the EU single market, as potential workplaces or may disengage during recognition procedures**.[109] Moreover, the absence of transparent and comparable mechanisms for recognising qualifications obtained outside the EU with those acquired within, frequently leads to under-utilisation of TCNs' skills in the labour market and overqualification. Doctors, nurses and engineers are frequently employed in low-skilled roles, resulting in widespread "brain waste."[110] This underemployment reduces efficiency, depresses earnings, and limits career progression, particularly in shortage sectors.[111] It also weakens integration, as skills are undervalued, prospects restricted and TCNs feel discriminated against based on their foreign origin.[112] Nearly 40% of highly qualified TCNs are working below their qualification level, which is almost double the rate of domestic citizens.[113] Ultimately, the EU does not make full use of the skills and qualifications that TCNs bring with them.

Employers face difficulties in effectively recruiting workers and addressing labour and skill shortages, which in turn affects the competitiveness of the Member States and the EU as whole.[114] Healthcare, construction, and ICT continue to experience pressing labour scarcities, while many skilled TCNs remain sidelined due to lengthy, untransparent and inconsistent qualification recognition procedures.

3.4 What is the size and scale of the problem?

3.4.1 The scale of recognition barriers on TCNs in the EU

As outlined in the previous sections, TCNs outside the EU often do not view the Single Market as a viable destination for employment due to numerous practical barriers - including fragmented and complex labour migration, recognition and validation processes,

[108] European Labour Authority (2025), EURES Report on labour shortages and surpluses 2024, Publications Office of the European Union, Luxembourg ; OECD (2020), "COVID-19 and key workers: What role do migrants play in your region?", OECD Policy Responses to Coronavirus (COVID-19), OECD Publishing, Paris, https://doi.org/10.1787/42847cb9-en.
[109] Cangiano A. (2014) Migration Policies and Migrant Employment Outcomes Conceptual Analysis and Comparative Evidence for Europe, 2014 CMS2014.4.CANG.pdf; Lodigiani, Rosangela & Sarli, Annavittoria. (2017). Migrants' competence recognition systems: controversial links between social inclusion aims and unexpected discrimination effects. European Journal for Research on the Education and Learning of Adults. 8. 127-144. 10.3384/rela.2000-7426.rela0201.
[110] Global Education Monitoring Report Team (2019). Global education monitoring report: migration, displacement and education: building bridges, not walls. Available at: https://unesdoc.unesco.org/ark:/48223/pf0000265866
[111] Global Education Monitoring Report Team (2019). Global education monitoring report: migration, displacement and education: building bridges, not walls. Available at: https://unesdoc.unesco.org/ark:/48223/pf0000265866
[112] internal source gathering evidence on the recognition of qualifications of TCNs provided by DG EMPL
[113] EUROSTAT (2024) 'Almost 40% of non-EU citizens over-qualified in 2023', 26 July. Available at: https://ec.europa.eu/eurostat/web/products-eurostat-news/w/ddn-20240726-1.
[114] Targeted interview with 3 HR departments

burdensome documentation requirements, and high associated costs. In addition, widespread overqualification and underemployment significantly undermine job satisfaction and integration prospects, which may further discourage skilled TCNs from engaging with the EU labour market.

Data on labour migration and the migrant workforce in the EU reveals the relevance of TCNs within the EU economy. According to the latest Eurostat statistics, in 2023, **4.3 million people immigrated to the EU from third countries.**[115] It is noteworthy that in nearly all EU Member States, the total number of immigrants from outside the EU in 2023 was higher than the number of immigrants from other EU countries; therefore, TCNs form a considerable part of the total EU workforce. As of 2024, **TCNs accounted for 6.5% (13.8 million) of the global EU workforce (213,6 million)**. Notably, TCNs represented a far greater share of foreign national workers (21,5 million, 10.1% of the total EU workforce) as compared to EU citizens working in another EU Member state (7.7 million, 3.6% of the total EU Workforce).[116] Analysing residence permits, data shows that in 2023, around **1.3 million first-residence permits were issued for employment-related reasons**, **representing 33.8 % of all first residence permits issued**. Family reasons accounted for 26.4 %, education reasons for 14.3 %, while other reasons, including international protection, accounted for 25.6 %.[117]

The scale of the problem is considerable. While the full extent of unmet or delayed demand for recognition by TCN cannot be measured precisely due to the absence of comparable EU-wide statistics on the number of people seeking recognition of their qualifications, macro-level data point towards a very large pool of potential applicants.

As indicated above, the share of the working-age population born in a third country has consistently increased over the past years. The same applies to both the absolute **number of TCN employed in the EU and their share of the total employed workforce**. In 2025, approximately **12.8 million non-EU citizens** were employed in the Union, up from 8.7 million in 2020 and **representing 6.4% of the total employed workforce**.[118]

In 2024 alone, approximately **1.1 million non-EU citizens** obtained a **first residence permit in the EU for employment reasons.** These numbers have been relatively stable in recent years and provide a conservative estimate of the actual application workload as they represent issued permits, not counting visa applications that are rejected during the vetting process.

Within this total pool, the EU Blue Cards, the researchers visa and the national highly skilled migration pathways require proof of a verified education degree or equivalent upper-level

[115] EUROSTAT (2025) 'EU received 4.3 million immigrants in 2023', 28 March. Available at: https://ec.europa.eu/eurostat/web/products-eurostat-news/w/ddn-20250328-2. This figure does not include asylum seekers and/or refugees from Ukraine under temporary protection for some countries (see the methodological note). Additionally, 1.5 million people migrated between EU countries.

[116] EUROSTAT (2025) 'Population by sex, age, citizenship, labour status and NUTS 2 region'. Available at: https://doi.org/10.2908/LFST_R_LFSD2PWN.

[117] EUROSTAT (2024) 'Residence permits - statistics on first permits issued during the year', 12 September. Available at: https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Residence_permits_-_statistics_on_first_permits_issued_during_the_year

[118] Eurostat LFS 2025.

vocational training. Consequently, in this impact assessment, the rounded sum of these three specific categories—amounting to **approximately 125,000 annual first permit issuances**—is utilized as the baseline estimate of the total number of annual applications which involve an element of qualification assessment and fall within the scope of the proposed initiative.

To isolate the **share of applications concerning regulated professions** within this pool and because migration databases do not record the regulatory status of the job the first residence permit applies to, we rely on several other sources yielding a **convergence interval of between 40,000 to 85,000 applications for regulated professions per year, with a central estimate of 62,500 applications annually**.[119]

However, the presence of TCNs in the workforce is uneven across different labour sectors. As explained above, there is a **clear overrepresentation of TCNs in some key sectors (e.g. healthcare, long-term care, food supply)** relative to the rest of the economy.[120]

Furthermore, as of 2023, the **overqualification rate** among **TCNs employed in the EU** was **39.4 %**, significantly higher than for other EU citizens (31.3 %) and **nationals** (20.8 %) and reaching a spike in southern Europe: Greece: 69.6 %, Italy: 64.1 %, Spain: 56.0. [121] To better understand the magnitude of the issue from the perspective of TCNs, insights from the European Commission's IA accompanying the future EU Talent Pool prove particularly valuable. The data show that TCNs frequently perceive a lack of adequate support when seeking employment in the EU, largely due to **limited access to and understanding of relevant information for recruitment**.[122]

More specifically, the IA data indicates that unclear information about job opportunities in the EU, as well as the rules and conditions governing their access, are a major factor preventing many TCNs from considering the EU labour market at all. According to the findings, **43% of respondents reported difficulties identifying suitable job openings, while 44% found it challenging to understand how to meet the required job criteria, many of which are directly or indirectly related to recognition processes.**

Among TCNs already in the EU, additional obstacles emerge and may vary according to their skills levels. The OECD highlights how highly educated labour migrants report being particularly affected by the **non-recognition of qualifications**, whereas medium- and low-skilled migrants tend to be more impacted by a lack of language skills and by discrimination practices to work linked to their origin, religion, or social background.[123] Among highly educated TCNs, 29% identified the recognition of foreign qualifications as either their primary or second most significant barrier to securing suitable employment. By comparison,

[119] See Annex 4 for more details on these estimations.
[120] Broberg, N. *et al.* (2024) 'Essential Work, Migrant Labour: What Explains Migrant Employment in European Key Sectors?' Available at: https://hal.science/hal-04520475, based on the European Labour Force Survey.
[121] EUROSTAT (2024) 'Almost 40% of non-EU citizens over-qualified in 2023', 26 July. Available at: https://ec.europa.eu/eurostat/web/products-eurostat-news/w/ddn-20240726-1
[122] OECD (2019), Building an EU Talent Pool : A New Approach to Migration Management for Europe , OECD Publishing, Paris. https://doi.org/10.1787/6ea982a0-en
[123] OECD (2019), Building an EU Talent Pool : A New Approach to Migration Management for Europe , OECD Publishing, Paris. https://doi.org/10.1787/6ea982a0-en

only 18% of highly educated mobile workers from within the EU report the same issue, highlighting the **gap between intra-EU and extra-EU migrants.**[124]

Related challenges in the recognition of qualifications and skills validation are closely linked to the EU's regulatory framework for migrants, which is widely perceived as **complex and fragmented**. According to the Talent Pool IA data, 52% of TCNs identified **difficulties in understanding employment and migration procedures** as significant barriers to recruitment, while 51% **considered the overall recruitment and immigration process excessively time-consuming, factors which undermine the feasibility of recognition within migration pathways.**

Overall, regardless of the country of origin or education level, **an estimated 60% to 70% of TCNs experience difficulties when seeking employment in the EU**.[125] More recent data from the European Labour Force Survey (2021) confirm this trend,[126] highlighting that TCNs who moved to the EU face the greatest obstacles in securing suitable employment due to insufficient language skills and the lack of recognition of their qualifications.

The **OECD Indicators of Talent Attractiveness (ITA)**[127] offer additional insight. The ITA assesses OECD countries' ability to attract and retain various categories of skilled TCNs and highlights both strengths and areas requiring improvement. Within the dimension of "quality of opportunities," job quality partly reflects the extent to which foreign qualifications are recognised in the host country. As cross-country comparative data on recognition rates are unavailable, the **OECD relies on overqualification rates as a proxy measure.**[128] While the EU scores highly on several factors that make it attractive to skilled TCNs, **it performs less strongly than other OECD countries in translating this attractiveness into actual inflows of TCNs for employment.**[129]

For TCNs, the process of having their skills and qualifications recognised in the EU is not only complex, but also **financially burdensome**. Costs begin to accumulate early in the process: The IA data[130] underlines how the main cost factors in the job search phase are linked to translations of necessary documents and administrative fees. In fact, certified translations alone could cost up to EUR 200, quickly becoming expensive for applicants with multiple documents (see Annex 4.5). While apostilles may be inexpensive - or even free - in some countries, in others they can cost EUR 100 or more.

The financial strain becomes even clearer when considering application fees, which vary widely across Member States. In some cases, these fees represent 25-50% of an average monthly salary; in others, they still amount to 10-24%. On average, submitting a recognition

[124] Ibid.
[125] Ibid.; OECD (2019), Building an EU Talent Pool : A New Approach to Migration Management for Europe , OECD Publishing, Paris. https://doi.org/10.1787/6ea982a0-en
[126] European Labour Survey 2021 Module on *Labour market situation of migrants and their immediate descendants.*
[127] Available at https://www.oecd.org/en/data/tools/talent-attractiveness-research--methodology.html
[128] Tuccio, M. (2019), "Measuring and assessing talent attractiveness in OECD countries", *OECD Social, Employment and Migration Working Papers*, No. 229, OECD Publishing, Paris, https://doi.org/10.1787/b4e677ca-en.
[129] OECD, Index of Attractiveness, 2023. Available at: https://www.oecd.org/en/data/tools/talent-attractiveness-2023.html
[130] Data from EU Commission 2023 IA, footnote 103, page 16.

application costs approximately EUR 700, with the actual recognition procedure adding a further EUR 350[131]

Beyond these formal charges, TCNs must also cover additional expenses. These include costs directly linked to the recognition procedure itself, such as translating diplomas, medical certificates, and fees for mandatory exams or assessments; migration-related expenses, including travel to the host country in order to complete recognition requirements in person; and language-related costs, notably fees for required language training. Applicants also face significant indirect costs, particularly income lost due to time spent outside employment while preparing for and undergoing the recognition process. Finally, the process is characterised by a high degree of unpredictability: TCNs are rarely informed in advance of the full scope and total amount of these costs, which further increases the financial and psychological burden. Taken together, these factors make the **recognition process a substantial financial barrier for many applicants.**

3.4.2 The scale of recognition barriers from the perspective of employers

Overall, **firms struggle to recruit workers with needed skills**, which affects productivity and competitiveness. Unpredictability and delays for third-country qualification recognition further exacerbate these labour shortages.[132] Uncertainty on the value of foreign qualifications (in both regulated and unregulated professions) and lengthy and cumbersome procedures for mandatory recognition in regulated professions and migration procedures result in employers hesitating to offer jobs to TCNs, thereby **limiting both labour market matching and economic inclusion.**[133] SMEs are disproportionately affected, as they generally lack specialised HR capacity, economies of scale, face higher administrative burdens, and have fewer resources to manage complex recognition processes.

Available EU-level data confirm that employers, and SMEs in particular, **struggle to understand the rules and procedures governing the recruitment of workers from outside the EU**. Insights from the 2023 Flash Eurobarometer 529 illustrate this clearly:[134] despite widespread labour shortages, only about 10% of SMEs had recently recruited a non-EU worker to work within the EU, and only 2% had hired non-EU workers remotely. Among the main obstacles identified were the **complexity of migration procedures** - including long processing times, high costs, and regulatory uncertainty (17%) - **language barriers** (25%), and **concerns about the comparability and authenticity of foreign qualifications** (11%).

[131] Data from EU Commission 2023 IA, footnote 104, page 16.
[132] Di Pietro, G. (2024) *Are EU Member States suffering from skill shortages more than other countries?* Seville: Joint Research Centre. Available at: https://publications.jrc.ec.europa.eu/repository/handle/JRC138167
[133] Bertelsmann Foundation (2023) *System Updates: Resetting the Future of Work A Collection of Policy Recommendations*. Washington DC. Available at: https://assets.ctfassets.net/9vqcz0fppkl3/3XO2r9DncF2OBXmq3yMYfJ/6316350091fe225fe38907a68cc96444/25012024_-2.pdf
[134] Flash Eurobarometer 529 European Year of Skills: Skills shortages, recruitment and retention strategies in small and medium-sized enterprises.

When asked **what would make it easier to attract qualified TCNs**, SMEs highlighted several needs: improved tools to assess applicants' skills (49%), better methods to identify their own skills gaps (49%), simplified procedures for the recognition of foreign qualifications (40%), and easier, more efficient processes for hiring workers from outside the EU (39%)[135]. These findings are echoed in the European Commission's IA on the EU Talent Pool, which shows that **61% of employers consider the complexity of employment and migration procedures a major barrier to recruiting TCNs**.

Employers also face considerable **direct and indirect costs**, particularly when hiring highly skilled workers. These include the need to obtain additional information through intermediaries, verify the authenticity of foreign documents, and manage administrative and compliance tasks[136]. Such expenses can be significant for SMEs, further discouraging them from engaging with TCN talent and contributing to ongoing labour and skills shortages across the Union.

3.5 Who is affected and how?

The table below summarises who is affected and how by the problem.

Table 1 – Who is affected and how by the problem

Stakeholders affected	How
TCNs	Due to the complex, lengthy, costly and untransparent procedures to recognise TCQs and validate skills, TCNs might be discouraged to reach the EU. The difficulties and long processes related to recognition of qualifications might postpone their labour-market entry, leading to underemployment/overqualification ("brain waste"); lower earnings and slower career progression. This might also turn into weaker integration outcomes and perceived discrimination.
Employers, including SMEs	They might face serious issues in filling labour shortages with vacancies that remain unfilled longer leading to higher recruitment and compliance costs and potential loss of competitiveness and productivity.
CAs	The slow processing of administrative procedures related to recognition of qualifications increase administrative workloads. The lack of coordination across multiple actors might turn into duplicated checks, inconsistent decisions and communications gaps. Moreover, the lack of comparability of TCQs requires case-by case judgement, regular interactions with third country authorities to check authenticity of documents thus increasing uncertainty and slow decisions.
Labour migration authorities	The complexity and administrative burden of procedures for the recognition of qualifications and validation of skills may reduce the efficiency and predictability of labour migration management. As labour migration authorities may need to take account of applicants' qualifications when assessing eligibility for visas and work permits, lengthy, fragmented and insufficiently transparent procedures can delay decision-making and make it more difficult to provide clear and reliable information to applicants and employers.

Source: Author's elaboration

[135] Ibid.

[136] Commission Recommendation (EU) 2023/2611 of 15 November 2023 on the recognition of qualifications of third-country nationals (OJ L, 2023/2611, 24.11.2023, ELI: http://data.europa.eu/eli/reco/2023/2611/oj)

3.6 How is the problem likely to persist?

In the absence of further EU-level action, the challenges related to the recognition of TCNs' qualifications and skills validation are **very likely to persist and intensify**, rather than diminish over time. The section below provides a snapshot of the demographic, labour-market and skills-demand trends that are likely to shape the evolution of the problems.

Persistent demographic and labour-market pressures

Long-term demographic projections indicate that the EU's labour supply will continue to contract. According to **Eurostat population projections,**[137] the share of the working-age population (15–64) in the EU is projected to decline steadily after 2030, while the old-age dependency ratio is expected to increase from **33% in 2022 to over 50% by 2050**, reflecting sustained population ageing across Member States. These trends imply a structurally tighter labour market, with fewer entrants replacing retiring workers. As a result, even taking into account increasing job automation, reliance on migrant labour is expected to grow, particularly in sectors already experiencing shortages.

Job vacancy rates have increased markedly over the past decade and remain high across the Union, signalling persistent mismatches between labour demand and supply. Eurostat vacancy data[138] and Eurofound analyses[139] show that shortages are no longer confined to specific countries or sectors but affect nearly all Member States and a broad range of occupations. In the absence of systemic improvements in skills recognition, these shortages are likely to coexist with continued underutilisation of available TCN skills.

Increasing skills demand linked to structural transitions

Skills demand forecasts support the assumption that recognition barriers will remain a binding constraint. **Cedefop skills forecasts to 2035**[140] show that around **nine out of ten job openings** in the EU are expected to result from **replacement demand** rather than net employment growth, driven primarily by retirements. Replacement demand is particularly strong in sectors such as **health and long-term care, construction, manufacturing, transport, and technical professions**, many of which are characterised by regulated occupations and complex recognition requirements. This implies that even in the absence of rapid economic expansion, labour demand pressures would remain high and persistent.

Sector-specific projections further reinforce this outlook. According to the **European Commission's Long-Term Care Report,**[141] the EU health and care workforce is expected to face a shortfall of around **2 million additional health and long-term care workers by 2030**, with demand continuing to grow thereafter due to ageing populations. These sectors

[137] https://ec.europa.eu/eurostat/web/population-demography/population-projections/database
[138] Eurostat, *Job vacancy rate by economic activity (NACE Rev. 2)*, dataset **jvs_q_nace2**
[139] Eurofound (2023), *Measures to tackle labour shortages: Lessons for future policy*, Publications Office of the European Union; Eurofound (2021), *Tackling labour shortages in EU Member States*, Publications Office of the European Union.
[140] **Cedefop** (2023), *Skills Forecast: Trends and Challenges to 2035*, European Centre for the Development of Vocational Training; see also **Cedefop** (2021), *Future skills needs in Europe: Labour shortages and occupational change*, Cedefop policy brief; **Cedefop** (2020), *Skills Forecast: Trends and Challenges to 2030*.
[141] **European Commission** (2021), *Long-Term Care Report: Trends, Challenges and Opportunities in an Ageing Society*, Volume I, Chapter 4 (Workforce challenges in long-term care)

already rely heavily on TCNs and are among those where recognition of qualifications constitutes a key access barrier. Without improvements in recognition systems, projected labour shortages risk coexisting with continued underutilisation of available third-country skills.

Green and digital transitions are expected to further intensify these pressures. Commission analyses linked to the European Green Deal and the Digital Compass[142] show that the transition to a climate-neutral and digital economy will generate substantial additional labour demand up to 2030 and beyond, including specialised and technical skills that cannot be supplied solely through domestic upskilling in the short term. Eurofound analyses[143] suggest that shortages in green-transition-related sectors have already doubled since the mid-2010s and are expected to persist.

Structural persistence of recognition-related barriers

Recognition systems that remain fragmented, slow and costly are unlikely to self-correct. As shown earlier in this report, recognition procedures for TCNs continue to vary widely across Member States, involving multiple authorities, divergent standards, and limited portability. In the absence of EU-level action, national reforms are expected to remain partial and uneven, reinforcing existing disparities rather than reducing them. Evidence from labour-market integration data suggests that **high overqualification rates among TCNs are persistent rather than transitional.**[144] In particular, Eurostat Labour Force Survey data[145] show that overqualification among non-EU citizens has remained consistently high over time, particularly in countries with strong labour demand. This indicates that skills mismatches linked to non-recognition are structural and unlikely to diminish without targeted intervention.

Continued barriers for employers and SMEs

From the perspective of employers, especially SMEs, **recruitment constraints linked to recognition barriers are also likely to persist**. Eurobarometer and Eurofound evidence[146] show that firms continue to report difficulties in assessing foreign qualifications, navigating recognition procedures, and aligning recruitment timelines with administrative processes. These constraints are particularly burdensome for SMEs, which generally lack specialised HR capacity. In the absence of EU-level simplification or coordination, these firms are likely to continue favouring EU candidates or leaving vacancies unfilled, even when qualified TCNs are available.

Implications for EU attractiveness and global competition for talent

[142] European Commission (2023), *A Green Deal Industrial Plan for the Net-Zero Age*, COM(2023) 62 final; European Commission (2021), *2030 Digital Compass: the European way for the Digital Decade*, COM(2021) 118 final.
[143] Eurofound (2021), *Tackling labour shortages in EU Member States*; Eurofound (2023), *Measures to tackle labour shortages: Lessons for future policy*.
[144] **OECD** (2022), *Skills and Labour Market Integration of Immigrants and their Children;* **OECD** (2019), *Settling In 2018: Indicators of Immigrant Integration*
[145] **Eurostat,** *Overqualification rate by citizenship*, EU Labour Force Survey (dataset **lfsa_ergaed**, time series)
[146] **European Commission** (2023), *Flash Eurobarometer 529 – SMEs, skills shortages and public support*; **Eurofound** (2021), *Tackling labour shortages in EU Member States*; **Eurofound** (2023), *Measures to tackle labour shortages: Lessons for future policy*.

Finally, projections on global labour mobility suggest that **competition for skilled workers will intensify**. OECD analyses[147] show that while the EU performs relatively well on several determinants of attractiveness, it underperforms compared to other advanced economies in translating this attractiveness into actual inflows of skilled TCNs workers. Recognition of qualifications and predictability of procedures are repeatedly identified as decisive factors in destination choice. Without EU-level action, recognition-related barriers are therefore likely to continue undermining the EU's ability to attract and retain global talent.

[147] **OECD** (2023), *Indicators of Talent Attractiveness 2023*, OECD Publishing

Why should the EU act?

3.7 The legal basis

In accordance with Article 4(2)(j) of the Treaty on the TFEU, **the area of freedom, security and justice (AFSJ) is a shared competence between the EU and the Member States**.[148] The AFSJ is elaborated further in Title V of the TFEU, Chapter 2 on EU policies concerning border checks, asylum, and immigration. Article 79 subsequently tasks the EU with developing a common immigration policy aimed at ensuring, among others, efficient management of migration flows and fair treatment of TCNs residing legally in the EU. To further elaborate this, **art. 79(2)** confers on the EU Parliament and the Council the ability to adopt measures on:

- The **conditions of entry and residence**, and standards on the issue by Member States of long-term visas and residence permits, including those for the purpose of family reunification
- The **definition of the rights of TCNs residing legally in a Member State**, including the conditions governing freedom of movement and of residence in other Member States;

Both provisions of Article 79(2) are complementary, yet distinct. While Article 79(2)(a) concerns the initial entry and residence, Article 79(2)(b) concerns the rights of TCNs during their legal residence. Together, these provisions give effect to the objectives set in Article 79(1) TFEU, which determines the broad discretion in determining lines of action under Articles 79(2) TFEU. In particular, the objectives of developing a common immigration policy as well as efficient management of migration flows at all stages constitute an extensive competence enabling the EU to determine, among others, for which TCNs to adopt EU measures based on Article 79 and corresponding conditions regarding their entry and stay in the EU.[149] It is thereby accepted that the amendments instituted by the Treaty of Lisbon to the predecessor of Article 79 (notably Article 63(3)(4) TEC) established a competence for the EU to adopt rules on economic migration.[150] This means that encouraging legal migration by adopting labour market measures constitutes a way to achieve the objectives of Article 79(1) thereby enabling action on the basis of Article 79(2) TFEU.[151] With regard to the initial entry versus rights during the stay, the Lisbon Treaty also clarified that Article 79(2)(a) concerns conditions related to an initial admission to the EU, while Article 79(2)(b) stipulates more explicit powers to introduce measures laying down the rights of legally residing TCNs.[152]

[148] Consolidated version of the TFEU. Available at: link.
[149] D. Thym 'Part C – Immigration' in K. Hailbronner & D. Thym (eds.) *EU Immigration and Asylum Law : A Commentary* (C.H. Beck 2016), p. 277 and 279-280.
[150] More specifically, this competence to determine rules on economic migration was deduced from the introduction of the discretion Member States have in accordance with Article 79(5) TFEU to determine volumes of admission of TCNs coming to the EU in the context of economic migration; see D. Thym 'Part C – Immigration' in K. Hailbronner & D. Thym (eds.) *EU Immigration and Asylum Law : A Commentary* (C.H. Beck 2016), p. 278.
[151] See M. Wilderspin, 'Article 79 TFEU' in M. Kellerbauer et al. *The EU Treaties and the Charter of Fundamental Rights* (OUP 2019), p. 841-843.
[152] Ibid.

3.7.1 The use of Article 79(2)(a)(b) TFEU

While both Articles 79(2)(a) and 79(2)(b) can be used individually,[153] in the case of the recognition of non-EU qualifications held by TCNs a joint use of Articles 79(2)(a) and 79(2)(b) is required to provide for a comprehensive framework allowing to comprehensively cover all the situations where TCNs require qualification recognition and/or skills validation.

First, TCNs may need recognition to be allowed entry and residence into the EU (covered by Article 79(2)(a) TFEU). In this scenario, recognition may be required as part of their visa or residence permit application (see section 3.2.1). For example, in the context of the Blue Card Directive, the highly qualified nature of the employment is assessed, among other criteria, through evidence of higher professional qualifications, which is a condition for a TCN to obtain residence under the Directive. Accordingly, the initial entry and subsequent right of residence are dependent on qualifications checks as evidence of higher professional qualifications. Such situation is covered by Article 79(2)(a) TFEU which concerns initial entry. Since Article 79(2)(a) allows the adoption of measures on economic migration,[154] it could also be used to adopt measures on recognition insofar as recognition is a precondition to obtain a work and residence permit. Therefore, to the extent there is a clear link with an ongoing migration process this legal basis could be used to adopt common recognition procedures in the event that a TCN is yet to move to the EU. For example, in the case of Blue Card holders exercising regulated professions, their application process would be facilitated if they could undergo common recognition procedures as part of the application for the initial issue of the card – and not solely upon receipt of the card (i.e. after a residence right was obtained, a situation covered by Article 79(2)(b) discussed below).

A second, subsequent, scenario concerns post-arrival recognition requirements (that is, after entry has taken place and a right of residence has been granted – scenario covered by Article 79(2)(b) TFEU). TCNs' chances to access employment in the EU are conditional on recognition of qualifications and validation of skills,[155] especially when employment is sought in a regulated profession.

Recognition may also be required upon secondary mobility, which is also mentioned in Article 79(2)(b) TFEU. A comprehensive framework for recognition of qualifications of TCNs is therefore also essential to facilitate existing opportunities for secondary mobility foreseen in EU migration directives.

To summarise, recognition of qualifications and validation of skills affect both economic migration and labour market access. A comprehensive framework on recognition of qualifications and validation of skills held by TCNs covering the different scenarios described above therefore necessitates the use of both Article 79(2)(a) and (b) TFEU.

[153] For example, in the case of the EU Talent Pool, only Article 79(2)(a) was used as legal basis due to its focus on supporting TCNs in obtaining a job offer. See European Commission, Proposal for a Regulation of the European Parliament and of the Council establishing an EU Talent Pool, COM(2023) 716 final, p. 5.
[154] M. Wilderspin, 'Article 79 TFEU' in M. Kellerbauer et al. *The EU Treaties and the Charter of Fundamental Rights* (OUP 2019), p. 842.
[155] See for example Cedefop Working paper (No. 20) *The role of qualifications in governing occupations and professions* (Publications Office of the EU 2013).

The combination of Article 79(2)(a) and (b) TFEU has already been used in the past as a legal basis in several EU Directives covering various aspects related to entry, access to employment, and secondary mobility. For instance, Articles 79(2)(a) and (b) were used as a legal basis for the Blue Card Directive[156] that establishes conditions of entry and residence for more than three months of TCNs coming to the EU to exercise highly qualified employment (as well as for their family members). Beyond the Blue Card Directive, the same legal basis of Articles 79(2)(a) and (b) TFEU was also used for the Intra-corporate Transferees Directive.[157] The latter establishes conditions of entry and residence for more than 90 days in the context of an intra-corporate transfer. Similar to the Blue Card Directive, Chapter II lays down the criteria for admission (including evidence of necessary professional qualifications),[158] Chapter IV determines the rights of intra-corporate transferees during their stay (including equal treatment on recognition of qualifications),[159] and Chapter V contains rights on secondary mobility.[160] A third example of the combined use of Articles 79(2)(a) and (b) TFEU can be found in the Researcher and Students Directive.[161] Though covering different categories of migrants (including volunteers and au pairs), the Directive contains the same categories of rights as the Blue Card and Intra-corporate Transferees Directives, at least as far as researchers are concerned. Indeed, Chapter II sets out criteria for admission,[162] Chapter V contains rights during stay (for researchers again including recognition of qualifications),[163] and rights to secondary mobility can be found in Chapter VI.[164]

In sum, **Art. 79(2)(a)** and **(b) TFEU** offer the most appropriate **legal basis for EU legislation aimed at harmonising and simplifying national procedures for the recognition of qualifications and validations of skills of TCNs**.[165]

3.7.2 Ensuring equal treatment between EU citizens and TCNs holding TCQs

Since the Professional Qualifications Directive is primarily focused on ensuring that Member States recognize professional qualifications from other Member States, there is a need for dedicated measures to ensure that EU citizens holding third-country qualifications are not

[156] 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, [2021] OJ L 382/1 (Blue Card Directive).
[157] 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, [2014] OJ L 157/1 (Intra-corporate Transferees Directive).
[158] See Article 5(1)(d) Intra-corporate Transferees Directive.
[159] See Article 18(2)(b) Intra-corporate Transferees Directive.
[160] See Articles 1, 11, 20, 21, 22 Intra-corporate Transferees Directive.
[161] 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, [2016] OJ L 132/21 (Researcher and Student Directive).
[162] For researchers, for example, see Articles 7 and 8 in particular of the Researcher and Student Directive.
[163] For researchers, for example, this right is granted through Article 12(1) of the Single Permit Directive (2024/1233). See Article 22 Researcher and Student Directive.
[164] See Articles 28-30
[165] Concerns regarding Article 79(4) TFEU are not to be considered of relevance in this context since that competence is considered to cover matters related to integration. Accordingly, the exclusion of harmonisation does not concern matters covered by Articles 79(2)(a)(b) TFEU. Interpreting Article 79(4) as restricting matters covered by Articles 79(2)(a)(b) runs counter to the objectives those provisions seek to achieve. Furthermore, as long as the interpretation of Articles 79(2)(a)(b) enables legally binding measures, their use is not prevented by the existence of Article 79(4). See D. Thym 'Part C – Immigration' in K. Hailbronner & D. Thym (eds.) *EU Immigration and Asylum Law : A Commentary* (C.H. Beck 2016), p. 283.

treated less favourably than third-country nationals with third-country qualifications. This need to ensure equal treatment of EU citizens was also explicitly emphasized in the Commission Recommendation (EU) 2023/2611 on the recognition of qualifications of third-country nationals.[166]

Articles **21(2)**, **46** and **53(1) TFEU** constitute the most appropriate legal basis to ensure that **TCQs held by EU citizens** are adequately recognised, whereas **Article 79(2) TFEU** provides the appropriate legal basis to ensure that **TCQs held by TCNs** are adequately recognised.[167] This distinction reflects the different Treaty provisions governing, respectively, the exercise of EU citizens' free movement rights and the Union's competence to regulate the entry, residence and associated rights of legally resident TCNs. Indeed, the improvement of the recognition of TCQs held by EU citizens would contribute to enhancing the implementation of the right to free movement established in Article 21(1) of the TFEU. For EU citizens, Articles 46 and 53(1) TFEU provide an internal market framework to remove obstacles to the free movement of workers and to facilitate access to regulated professions through measures on the mutual recognition of diplomas and professional qualifications; where necessary, Article 21(2) TFEU operates as a complementary basis to ensure effective enjoyment of the right to move and reside freely. On the other hand, Article 79(2) TFEU serves as a legal basis for EU action regarding the professional recognition of TCQs held by TCNs because it specifically empowers the Union to adopt measures relating to the conditions of entry and residence of TCNs, as well as the definition of their rights during legal residence. In this context, recognition of professional qualifications and validation of skills are essential aspects of enabling TCNs to effectively participate in the labour market and integrate into host societies. By providing a framework for the recognition of qualifications, Article 79(2) TFEU ensures that TCNs' skills and credentials can be assessed and valued appropriately, thereby supporting their access to employment and facilitating their contribution to the EU economy. This legal basis thus underpins EU actions aimed at harmonising and improving qualification recognition processes for TCNs as part of broader migration and labour-market policy objectives.

3.8 Subsidiarity: Necessity of EU action

According to **Article 4(2)(j) TFEU**, matters relating to the area of freedom, security and justice fall under the shared competences of the EU. Since this is not an area of exclusive EU competence, any EU intervention must comply with the principle of subsidiarity. This principle requires that, in areas of shared competence, the EU should act only when the objectives of the proposed action cannot be sufficiently achieved by the Member States acting individually.

TCNs often face significant difficulties in having their qualifications and skills recognised and validated. These challenges can discourage them from moving to the EU for work, thereby

[166] Recital 22, Points 50-52 Commission Recommendation (EU) 2023/2611 of 15 November 2023 on the recognition of qualifications of third-country nationals, [2023] OJ L 1/17.

[167] Use of legal bases beyond the ones mentioned in this paragraph is less likely to be successful in ensuring adequate procedures for recognition also exist for EU citizens with TCQs. In particular, a potential reliance on Article 114 or 352 TFEU does not appear fruitful due to, respectively, the scope excluding the free movement of persons and the existence of more specific legal bases.

limiting the Union's ability to address labour and skills shortages, which increasingly have a cross-border dimension. However, difficulties relating to the recognition of qualifications are not faced by TCNs alone. Employers also encounter considerable obstacles when employing TCNs, as recognition procedures may likewise impede employment and skills may not be adequately validated. Additionally, challenges regarding recognition procedures and validation of skills are felt among TCNs and employers across the EU and are not specific to individual Member States.[168] The current fragmentation of national legal systems and lack of an overarching EU framework setting out a minimum set of procedures and practices creates uncertainty for TCNs. These unpredictable and inconsistent outcomes may reduce their willingness to engage in recognition processes for employment purposes.

National level initiatives risk increasing divergences between Member States, further complicating the landscape for TCNs. At present, this landscape is particularly varied since Member States may extend application of existing EU legislation to TCNs, may apply other instruments of international law, or may have their own national procedures for recognition of TCQs. As a result, there is no single nor coherent framework under which to recognise the qualifications held by TCNs. Such fragmentation has negative effects on the capacity of the EU to not only attract skilled persons but also to retain them. By contrast, an EU initiative could support the development of a common framework that reduces these differences, improves transparency, and enhances the usability of recognition outcomes,[169] while leaving final recognition decisions fully in the hands of the Member States, thus fulfilling the subsidiarity principle. Indeed, the establishment of a common EU framework on the recognition of professional qualifications obtained by TCNs in a third country and validation of skills does not affect the Member States' decisions to recognise professional qualifications, nor the way professions and education systems are regulated at the national level. Coordinated EU action can reduce administrative and legal barriers that are currently country-specific, improve transparency and comparability of pathways, and help ensure that the benefits of mobility and talent initiatives are not undermined by divergent recognition practices. This is also consistent with recent EU-level political commitments and recommendations calling for simplification, faster processing and more systematic recognition for TCNs and displaced persons.[170] Further considerations on the need for EU action are provided in Annex 11.

[168] V. Donlevy et al. (2016), Study on Obstacles to Recognition of Skills and Qualifications. Available at: https://op.europa.eu/da/publication-detail/-/publication/156689fd-e922-11e6-ad7c-01aa75ed71a1/language-en; K. Adams et al. (2025), Qualification Data Needs to Support Recognition of Non-EU Country Vocational Qualifications. Available at: https://www.etf.europa.eu/en/publications-and-resources/publications/qualification-data-needs-support-recognition-non-eu-country.

[169] PC analysis Annex 10. , Q61. "To what extent do you think EU-level action is necessary for the following objective: To simplify the way in which people who have acquired qualifications or skills outside the EU can get them recognised in the EU so that they can access the EU labour market", very necessary (70,4%), somewhat necessary (19,8%), not very necessary (5,3%), Not at all necessary (2,1%), (n=486); Survey targeted at ENIC NARIC centres, Q34: "To what extent do you deem an EU intervention necessary to ensure: - A common framework to streamline procedures for recognition of TCQs held by TCNs", to a large extent (27,8%), to a moderate extent (27,8%) to a small extent (22,2%) not at all (22,2%), (n=18)

[170] European Commission (2024). Political Guidelines for the Next European Commission 2024–2029. Publications Office of the European Union. Available at: https://commission.europa.eu/document/download/e6cd4328-673c-4e7a-8683-f63ffb2cf648_en?filename=Political%20Guidelines%202024-2029_EN.pdf. Commission Recommendation (EU) 2022/554 of 5 April 2022 on the recognition of qualifications for people fleeing Russia's invasion of Ukraine. Available at: http://data.europa.eu/eli/reco/2022/554/oj. COMMISSION RECOMMENDATION (EU) 2023/2611 of 15 November 2023 on the recognition of qualifications of third-country nationals. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32023H2611.

3.9 Subsidiarity: The added value of EU action

An **EU initiative would have the advantage of streamlining procedures and practices for recognition of qualifications and validation of skills with a view to enhance the transparency and predictability of recognition processes**, thereby enabling TCNs to better understand procedural requirements, prepare necessary documentation, and anticipate the stages of assessment.[171] By streamlining these procedures, the framework would reduce unnecessary duplication and delays for TCNs. This can facilitate access to EU labour markets for TCNs and thereby support EU employers in their efforts to plug labour shortages, overall resulting in improved EU competitiveness.

By streamlining procedures and practices for the recognition of TCNs' professional qualifications and the validation of skills, the EU would further pursue its objectives of enhancing competitiveness, including by attracting highly skilled migrants from outside the EU, removing barriers to their recruitment, and addressing skills shortages.[172] Beyond fostering competitiveness, such EU-level action would align with key EU priorities, including the improvement of legal migration management and would support broader EU policies such as the Union of Skills, the European Pillar of Social Rights (EPSR) and the New Pact on Migration and Asylum. This EU initiative would also strengthen social cohesion by fostering social inclusion and ensuring fairer recruitment practices for migrant workers. In sum, aligning efforts to streamline procedures and practices for the recognition of TCNs' professional qualifications and the validation of skills with existing policies both maximises the initiative's impact and contributes to the Union's overarching objectives.

[171] Survey targeted at ENIC NARIC centres, Q34: "To what extent do you deem an EU intervention necessary to ensure: - A common framework to streamline procedures for recognition of TCQs held by TCNs", to a large extent (27,8%), to a moderate extent (27,8%) to a small extent (22,2%) not at all (22,2%), (n=18); PC analysis Annex 10. ,Q71: " Would any of these situations make your process for recruiting people from another country easier and cheaper? (select all that apply) Receiving a comparability/recognition statement of a candidate's qualification in relation to a qualification from a system that I am familiar with.
Having access to detailed information on what knowledge and skills a person has acquired through a qualification (e.g. through a qualifications database). Having access to information on foreign qualifications translated into my language (80%), A faster process to have the qualifications of potential recruits recognised (70%), A faster process to obtain a work permit for potential recruits (60%), (n=20)

[172] Enrico Letta (2024). Much More than a Market. Available at: https://www.consilium.europa.eu/media/ny3j24sm/much-more-than-a-market-report-by-enrico-letta.pdf, p. 103, Mario Draghi (2024a). *A competitiveness strategy for Europe*. Available at: https://commission.europa.eu/topics/eu-competitiveness/draghi-report_en#:~:text=Read%20Mario%20Draghi%27s%20report%20on%20the%20future%20of,on%20how%20Europe%20can%20boost%20its%20economic%20growth, p. 32-33. Mario Draghi (2024b). *A competitiveness strategy for Europe*. P-265-266 Available at: https://commission.europa.eu/document/download/ec1409c1-d4b4-4882-8bdd-3519f86bbb92_en?filename=The%20future%20of%20European%20competitiveness_%20In-depth%20analysis%20and%20recommendations_0.pdf, p. 266.

4 Policy objectives

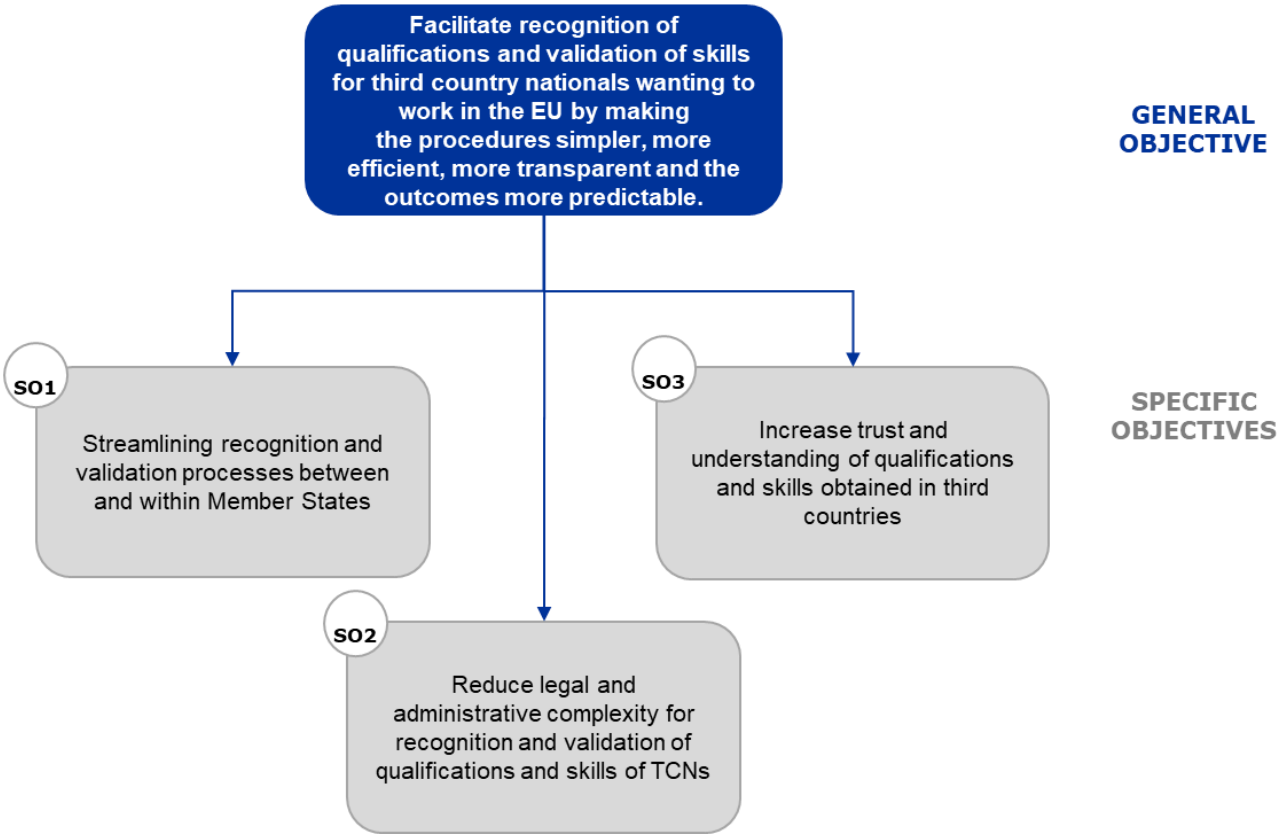
To elaborate the policy objectives, we will structure our work into three steps:

- Both general and specific policy objectives for future EU intervention have been developed in line with BRT TOOL #15. We will define Specific, Measurable, Achievable, Relevant and Time-bound (S.M.A.R.T) policy objectives based on the identified problems and underlying drivers, classifying them according to their hierarchical level:
- **General objectives**: Overall Treaty-based goals which the intended policy intervention is aimed at, expressed in terms of ultimate goals of the intervention;
- **Specific objectives**: The immediate goals the intervention is aimed to achieve – the targets that first need to be reached for the general objectives to be met.

The objective tree for the Study is provided in the Figure below.

As mentioned above, the specific objectives have been developed so to be SMART, in line with Better Regulation Guidelines. Indeed, they are **specific**, as they clearly identify the policy domain, the target group and the intended changes; **measurable**, insofar as progress can be assessed through indicators related to the duration, complexity, transparency and outcomes of recognition and validation procedures; **achievable**, since they focus on improving existing systems and administrative practices rather than requiring full harmonisation; and **relevant**, as they directly address the problem drivers underlying the under-use of third-country nationals' qualifications and skills in the EU labour market. Finally, while the objectives do not contain an explicit deadline in their wording, they can be considered time-bound insofar as they are intended to be achieved over a defined implementation horizon, for instance by 2030, in line with the time needed for Member States to adapt administrative processes and for the effects of the initiative to materialise.

Figure 4 - Objective tree



Source: Author's elaboration

5 Policy Options

In order to address the identified challenges, the following policy options have been elaborated:

- The baseline scenario (PO 0);
- Three POs (policy packages), ranging from the least to the most stringent one, including a variety of measures, including non-legislative (soft) ones, extensions of delegated powers and legislative ones (i.e.: requiring the amendment of the PQD).

The next sections provide further details on the specific legislative and non-legislative POs.

5.1 From the long list of policy measures to the final list of policy options

In line with the *Better Regulation Guidelines* (Tool#16),[173] a long list of policy measures was prepared following the problem assessment, the assessment of the EU's right to act and the identification of relevant policy objectives. The table presented in Annex 12.1 shows the long list of policy measures identified, categorised as follows:

- **A# = Legislative measures** at the EU level that complement the existing legislative framework by introducing common rules to streamline administrative procedures for the recognition of professional qualifications and the validation of skills of TCNs. Such measures could include common rules on deadlines, documentation and verification requirements, and rights of appeal; provisions to enhance recognition and validation outcomes (for example, common rules on compensation measures to address qualification gaps, prioritising supervised practice and bridging courses, and resorting to examinations or full academic re-education only as a last resort); profession-based benchmarks or common procedural steps for recognition; recognition-related language requirements; and prioritised or fast-track recognition and validation procedures in EU priority sectors, including sectors relevant for innovation.
- **B# = Non-legislative measures**, at the EU level or national level including soft-law measures to enable more efficient and effective recognition of qualifications and validation of skills. Such measures could include guidelines, mutual learning activities, the dissemination of best practices and comparative studies, benchmarking exercises, and information exchanges within relevant EU fora (e.g. the Advisory Committee of the PQD and expert groups), both among Member States' regulatory authorities and between the EU Member States and third countries, with a particular focus on partner countries under Talent Partnerships.

For each category, measures are numbered sequentially (e.g.: A1, A2, A3, etc.)

173 Better Regulation Guidelines Chapter 2, "How to carry out an impact assessment", Tool #16 "How to identify policy options", pp. 113 – 121. c0561a9c-d112-4d20-b1ec-145748e2c61c_en

5.1.1 Measures discarded at an early stage

In line with the *Better Regulation Guidelines* (Tool #16),[174] the long list of measures was subject to a screening to identify the most effective and viable measures, which were subsequently clustered into three comprehensive policy options (i.e.: packages), in addition to the status quo / baseline policy option. The list of discarded measures is provided in Annex 12.1 .

5.1.2 The final list of policy options

The retained policy measures were grouped into alternative POs presented in Section 5.2 and further detailed in Annex 12.2 The three policy options, alternative to the baseline scenario differ in their degree of regulatory stringency, reflecting the nature of the instruments used.

5.2 Description of the policy options

5.2.1 PO0: Baseline scenario

Currently, recognition of qualifications and validation of skills of third-country nationals in the EU is organised at Member State level and is characterised by fragmentation, procedural complexity and uneven outcomes across Member States.

Recognition and validation are also closely intertwined with a diverse set of EU and national labour migration instruments. Recognition of qualifications may be required for access to regulated professions (whether in parallel or subsequent to an admission process), as part of admission under migration schemes that may have skills or qualifications requirements, or for both. These processes are typically governed by separate legal frameworks, involve different authorities and follow different timelines. In many Member States, limited coordination between migration authorities and recognition or employment bodies results in delays, duplication of assessments, repeated documentation requests, and inconsistent outcomes.

Some Member States (e.g. DE, IE, IT, LV) are making increasing efforts to improve recognition systems, as parts of efforts to attract talent, including simplification of procedures, and the provision of better information to applicants and employers.[175] However, these improvements are often developed in isolation across different authorities, sectors or professions. As a result, they tend to address specific processes or use cases rather than

174 Ibid.

175 Internal source gathering evidence on the recognition of qualifications of TCNs provided by DG EMPL; Focus group on labour migration with migration authorities and IOs (n=28); Focus Group on information and support to TCNs with ENIC NARIC centres, PES and CSOs (n=28); Focus group on attracting talent with HR departments and talent partnerships stakeholders (n= 27); Focus Group with CAs in the healthcare sector (n=31).

the overall functioning of recognition systems. This can unintendingly lead to further divergence in approaches, increased complexity for users and limited scalability of solutions.

In parallel, Member States also invest in building trust in TCQs, including through cooperation with third-country authorities. These efforts are likewise often undertaken independently, leading to duplication of work, limited mutual learning and, in some cases, divergent conclusions on the same qualifications. Annex 12.2.1 provides further consideration on the description of the baseline scenario.

5.2.2 PO1: Building on existing mechanisms to improve recognition and validation

This PO would strengthen and build on existing EU instruments for talent attraction, skills portability and labour migration to reduce system-level complexity, improve the experience of third-country nationals and employers, and build trust in the recognition of TCQs. Rather than creating a new standalone framework, it would add targeted measures across a cross-section of existing mechanisms, focusing on information, procedures, cooperation and capacity. The option would rely on voluntary participation by Member States, supported where appropriate by EU funding and coordination. Actions would be designed to respect national competences while addressing fragmentation, administrative burden and lack of predictability.

Table 2 – Policy option 1

Building on existing mechanisms to improve recognition and validation	
Driver 1: Diverging recognition systems within and between Member States	
1.1 Different recognition systems applied to the same qualifications across Member States	**B1**. Launch structured mutual-learning programmes and comparative studies on national recognition and validation practices for third-country nationals.
	B2. Guidelines on EU minimum training requirements for sectoral professions to provide common guidance for Member States on the recognition of qualifications of TCNs in these professions.
	B3. Develop common guidelines, templates and checklists for recognition and validation procedures to support consistency in administrative practices.
	B4. Promote benchmarking and capacity building activities on the validation of skills of TCNs across the EU, with the support of CEDEFOP.
1.2 Duplication and inconsistencies of recognition procedures within Member States	**B5**. Identify and disseminate best practices on streamlined and consistent recognition procedures across and within different national systems.
1.3 Lack of clear and accessible information for TCNs and employers	**B6.** Improve EU-level information provision for individuals and employers, including in the EU Talent Pool, including clear guidance on recognition requirements, documentation and processing times.

Building on existing mechanisms to improve recognition and validation	
Driver 2: Complex and burdensome administrative procedures for recognition	
2.1 Lengthy and untransparent administrative procedures	**B7.** Develop EU-level common guidance defining procedural steps and indicative maximum processing timelines
2.2 Burdensome documentation and translation requirements	**B8.** Issue recommendations on proportionate documentation and translation requirements and facilitate exchange of best practices among Member States
2.3 High and unclear costs	**B9**. Issue guidelines (e.g.: a calculation formula) to determine reasonable fees for recognition processes
Driver 3: Lack of trust and understanding of qualifications and skills obtained in Third Countries	
3.1 Concerns over authenticity of documents issued in third countries	**B10.** Support use of fraud and authenticity checklists, digital or Artificial Intelligence (AI)-powered solutions, and reference sources for verification of institutions and documents.
	B11. Facilitate pre-departure support under Talent Partnerships, including upstream skills assessment and documentation preparation.
3.2 Insufficient knowledge about third-country educational systems, curricula and standards	**B12** Undertaking additional comparisons of TCQs frameworks with the EQF. **B13.** Facilitate information exchange on TCQs in co-operation relevant EU groups (EQF, GoC)
3.3 Doubts about the efficacy of quality assurance within third-country systems	**B14.** Support further ETF work to improve transparency, comparability and understanding of quality assurance of TCQs and credentials.

Source: Author's elaboration

5.2.3 PO2: Common rules to streamline procedures

This option would introduce a common EU legal framework to reduce fragmentation, complexity and unpredictability in the recognition and validation of qualifications and skills of third-country nationals. It establishes binding common procedural rules applicable across Member States with the aim to simplify procedures, improve user experience and strengthen trust, while fully respecting Member States' competences in regulating professions and managing labour migration and admissions. The rules focus on procedural alignment without harmonising qualification requirements or national admission policies.

Table 3 – Policy option 2

Common rules to streamline procedures
Driver 1: Diverging recognition systems within and between Member States

Common rules to streamline procedures	
1.1 Different recognition systems for the same qualifications across Member States	**A1**. Establish common rules for procedures that national authorities shall follow when assessing skills and qualifications of third-country nationals.
1.2 Duplication and inconsistencies of recognition procedures within Member States	**A2.** Establish rules for Member States to organise and coordinate national systems for recognition and validation to prevent overlap and duplication between procedures for access to regulated professions and as part of labour migration processes.
1.3 Lack of clear and accessible information for TCNs and employers	**A3.** Establish minimum mandatory information requirements that Member States must consistently provide to TCNs (applicable recognition regime, documentation, timelines, fees, appeal rights etc.).
Driver 2: Complex and burdensome administrative procedures for recognition	
2.1 Lengthy and untransparent administrative procedures	**A4.** Establish clear procedural guarantees, including deadlines for acknowledgment of applications, issuing a substantiated decision, and right of appeal.
2.2 Burdensome documentation and translation requirements	**A5** Establish a common set, along with a maximum number of documents that national authorities may require. **A6**. Establish an obligation to accept documents in more than one language, including one language frequently used by migrants.
2.3 High and unclear costs	**A7**. Introduce common rules to establish fees (not exceeding the cost of the service provided) that national authorities can charge applicants for applications.
Driver 3: Lack of trust and understanding of qualifications and skills obtained in Third Countries	
3.1 Concerns over authenticity of documents issued in third countries	**A8** Establish an EU-level service to carry out authenticity checks on evidence of formal qualifications issued in third countries to support Member State authorities in their assessment procedures.
3.2 Insufficient knowledge about third-country educational systems, curricula, and standards	**A9.** Mandate Member States to develop interoperable national databases on the comparability of TCQs, with the possibility to issue comparability statements, so as to facilitate the sharing of information between Member States on their recognition decisions and further the transparency of recognition procedures.
3.3 Doubts about the efficacy of quality assurance within third-country systems	**A10** Allow Member States to apply compensation measures where there are justified doubts on the quality of the education and qualification system under which the formal qualification has been awarded.

Source: Author's elaboration

5.2.4 PO3: Common rules including automatic recognition for selected profession (building on Option 2)

This option would establish an EU framework for the automatic recognition of selected TCQs in regulated professions, based on a system of prior verification of learning programmes against EU standards. It would focus on professions with harmonised minimum training requirements under Directive 2005/36/EC (doctors, nurses, dentists, pharmacists, mid-wives, veterinary surgeons and architects), which are of high economic importance and subject to significant labour shortages.

The objective of this option is to move from a fragmented, case-by-case assessment of individual qualifications towards a system based on trust in verified education and training programmes from third countries. By ensuring that qualifications are issued on the basis of programmes that meet EU quality and training standards, this approach would enable faster, more predictable and more consistent recognition outcomes across Member States. In turn, this would reduce administrative burden, facilitate recruitment and improve the EU's attractiveness for global talent.

Under this framework, qualifications obtained in third countries would be granted the same effect as those issued in Member States, provided that they are based on learning programmes that have been successfully reviewed and validated through a common EU approach.

Table 4 – Policy option 3

Common rules including automatic recognition for selected profession (building on Option 2)	
Driver 1: Diverging recognition systems within and between Member States	
1.1 Different recognition applied to the same qualifications across Member States	**A1.** **+ A11 on creating an automatic recognition route**
1.2 Duplication and inconsistencies of recognition procedures within Member States	**A2.**
1.3 Lack of clear and accessible information for TCNs and employers	**A3.** **+** B15. Create a public EU register of third-country learning programmes eligible for automatic recognition.
Driver 2: Complex and burdensome administrative procedures for recognition	
2.1 Lengthy and untransparent administrative procedures	**A11.** Establish an EU framework for the automatic recognition of selected TCQs in regulated professions, based on a system of prior verification of learning programmes against EU standards **+ A4**
2.2 Burdensome documentation and translation requirements	**A5** **A6**

Common rules including automatic recognition for selected profession (building on Option 2)	
2.3 High and unclear costs	**A7**
Driver 3: Lack of trust and understanding of qualifications and skills obtained in Third Countries	
3.1 Concerns over authenticity of documents issued in third countries	**A12.** Require issuance of qualifications as verifiable digital credentials for automatic recognition to ensure authenticity. **+A9**
3.2 Insufficient knowledge about third-country educational system, curricula and standards	**B15.** Establish a public EU Register of approved third-country learning programmes and corresponding qualifications eligible for automatic recognition
3.3 Doubts about the efficacy of quality assurance within third-country systems	**A11.** Establish an EU framework for the automatic recognition of selected TCQs in regulated professions, based on a system of prior verification of learning programmes against EU standards **+A10**

Source: Author's elaboration

6 Analysis of the impacts of the policy options

6.1 What are the impacts of the policy options?

6.1.1 Assessment of PO 0: Baseline scenario

The following table provides a summary assessment of the expected impacts of policy option 0. A complete assessment, clearly presenting supporting evidence, is included in Annex 15.

Type of impacts	Summary of assessment
Social	The **current limitations of the system** — including fragmented procedures, limited transparency, lengthy processes and uneven implementation across Member States — **are expected to persist over time**, without significant improvement in social outcomes. From a social perspective, effective recognition and validation systems are important enablers of labour market integration, access to regulated professions, social inclusion and the fuller use of individuals' skills and experience. They can also support faster settlement, economic independence and broader participation in host societies. However, many **TCNs** currently face difficulties in translating their qualifications and skills into employment opportunities that match their profile. In the absence of intervention, the baseline scenario is not expected to significantly improve the accessibility or fairness of current systems. In particular: TCNs are likely to continue facing obstacles in accessing employment opportunities corresponding to their qualifications and experience; risks of underemployment, deskilling and "brain waste" are expected to persist; disparities in access to recognition and validation procedures across Member States may remain; sectors and communities that could benefit socially from faster labour market integration of qualified migrants may continue to experience unmet needs. For **employers**, especially in sectors such as healthcare, education or technical professions, continued barriers may indirectly affect the availability of qualified workers. Evidence from the Flash Eurobarometer 529 suggests that employers across the EU rely to a limited extent on recruitment from outside the EU to address labour shortages. On average, 10% of SMEs report having recently recruited workers from outside the EU to work in person within the EU, while a further 2% report recruiting non-EU workers both for in-person work within the EU and for remote work from abroad. Another 2% indicate that they have recruited workers exclusively for remote work from outside the EU.[176] Larger SMEs are considerably more likely to recruit internationally than smaller firms: 22% of SMEs with 50-249 employees report having recently recruited workers from outside the EU for in-person work within the EU, compared to 9% of SMEs with fewer than 10 employees.[177] Employers may also continue facing uncertainty when interpreting qualifications obtained outside the EU. In this regard, insights from the Public Consultation indicate that existing comparability tools do not adequately support real-world decision-making, particularly in recruitment and professional recognition contexts.[178] This suggests that, although inefficiencies in recognition systems may continue to affect access to skills in certain sectors and enterprises, these effects are expected to remain broadly in line with current conditions rather than materially worsen as a result of the baseline scenario. Overall, the baseline scenario is therefore expected to have no impact (rate: 0) on social outcomes, reflecting the persistence of existing barriers and the absence of structural improvement in access, inclusion and skills utilisation.

[176] European Commission (2023), Flash Eurobarometer 529 – European Year of Skills: Skills shortages, recruitment and retention strategies in SMEs.
[177] Ibid
[178] PC Results. Q113: Would you suggest changes to any of the above tools to enhance the portability of skills and qualifications to the single market? If so, please elaborate (n=486), Contribution to the call for evidence – Confederation of Danish Employers; in European Commission (2026). *Study Supporting an Impact Assessment of EU rules for the recognition of qualifications and validation of skills of third country nationals. Public Consultation Analysis*.

Type of impacts	Summary of assessment
Economic	The current economic inefficiencies associated with fragmented procedures, lengthy processing times, limited transparency and uneven implementation across Member States are expected to persist over time, without significant improvement in labour market or productivity outcomes. From an economic perspective, effective recognition and validation systems are important to facilitate labour market matching, improve the allocation of skills, support productivity growth and help employers access qualified workers from outside the EU. They are particularly relevant in the context of demographic ageing, labour shortages and increasing competition for global talent. However, existing barriers reduce the capacity of TCNs to enter employment rapidly and at the appropriate qualification level, while also limiting the ability of employers to fill vacancies efficiently. In the absence of intervention, the baseline scenario is not expected to significantly improve the contribution of recognition systems to labour market functioning or competitiveness. In particular, **employers** are likely to continue facing difficulties in recruiting qualified TCNs in a timely and predictable manner, especially in shortage occupations and highly regulated sectors; labour and skills shortages may persist, including in sectors such as healthcare, engineering, construction, ICT and other professions where recognition can be a gateway to employment; inefficiencies in skills allocation are expected to remain, where qualified individuals work below their competence level or face delayed labour market entry; productivity gains associated with faster integration and better use of migrant skills may remain unrealised. Evidence from Flash Eurobarometer 529 highlights that recruitment from outside the EU among SMEs is often perceived as burdensome. Among SMEs that have recently recruited workers from outside the EU, more than half describe the process as either very (20%) or moderately difficult (32%).[179] In this regard, SMEs reported, among others, language-related constraints (25%), or concerns linked to the complexity, cost and uncertainty of migration and recruitment procedures (17%). Smaller shares also refer to difficulties in assessing foreign qualifications (12%) and insufficient institutional support (11%).[180] Moreover, according to the Public Consultation, employers' demand for formal recognition of qualifications is largely shaped by external obligations rather than their own preferences. In particular, recognition is primarily required either to meet regulatory or contractual conditions (such as those associated with public tenders or subsidised contracts) or to ensure the authenticity of qualifications.[181] These findings suggest that existing administrative and recognition barriers may not only discourage employers from engaging in international recruitment but may also reduce the efficiency of hiring processes where labour shortages persist. For **CAs**, the absence of reform means that current administrative models and resource needs are likely to remain broadly unchanged, with costs driven mainly by demand volumes rather than structural efficiency gains. Overall, the baseline scenario is therefore expected to have no impact (rate: 0) on economic outcomes, reflecting the persistence of existing labour market frictions and the absence of structural improvement in skills utilisation, recruitment efficiency and competitiveness.

179 Ibid.
180 Ibid
181 PC Results. Q54: Why do you ask candidates to get their foreign qualifications recognised by a competent authority in your country? (n=18) answers: To show appreciation and esteem that can contribute to talent retention.(1); To determine the correct wage or pay category for the candidate (3); To better understand what candidates have learnt compared to people with a similar qualification in my country (4); To verify that the qualification is authentic (5); To comply with requirements set by others (e.g. in a public tender, a subsidised contract, or a contract with another business) (5).; *in European Commission (2026). Study Supporting an Impact Assessment of EU rules for the recognition of qualifications and validation of skills of third country nationals. Public Consultation Analysis*.

Type of impacts	Summary of assessment
Fundamental rights	The current limitations of the system are expected to persist over time, without significant improvement in the practical exercise of rights linked to access to employment, fair treatment and integration within the EU labour market. From a fundamental rights perspective, recognition and validation procedures are closely connected to the effective enjoyment of several rights and principles, including equality before the law, non-discrimination, fair and transparent administrative treatment, access to employment opportunities, and, where relevant, the ability to pursue an occupation under national law. For TCNs legally residing in the EU, these procedures can be an important gateway to exercising such rights in practice. While the existing EU and national legal framework already provide safeguards in these areas, the evidence in the report indicates that fragmented procedures, unclear information, lengthy timelines and uneven implementation may continue to limit the accessibility and predictability of recognition systems in practice. In the absence of intervention, these barriers are expected to remain. In particular, **TCNs** may continue to face difficulties in accessing recognition or validation pathways in a timely and transparent manner; differences in procedures and implementation across Member States may continue to affect consistency and predictability of treatment; existing gaps between formal rights and their effective exercise in practice may persist, particularly where administrative complexity or lack of information creates practical obstacles; individuals whose qualifications are not effectively recognised may continue facing barriers to equal labour market participation. Evidence from a 2025 European Labour Authority report on the posting of TCNs further highlights how these structural constraints can translate into concrete risks for the effective exercise of rights in practice. While the analysis is primarily focused on subcontracting chains and posting arrangements, it provides relevant insights concerning broader systemic vulnerabilities affecting TCN workers in cross-border labour mobility contexts. The report shows that TCN workers often face information barriers and a lower propensity to report infringements, which may further limit the effective enforcement of their rights in cross-border work contexts.[182] Taken together, these findings suggest that, even where formal rights exist, practical obstacles related to enforcement capacity, information asymmetries and contractual complexity may constrain their effective enjoyment of rights. For **employers**, the impact on fundamental rights is indirect, but clearer and fairer procedures can affect equal access to opportunities and labour market participation more broadly. Overall, the baseline scenario is therefore expected to have no impact (rate: 0) on fundamental rights, reflecting the persistence of current obstacles and the absence of structural improvement.

6.1.2 Assessment of PO 1: Building on existing mechanisms to improve recognition and validation

The following table provides a summary assessment of the expected impacts of policy option 1. A complete assessment, clearly presenting supporting evidence, is included in Annex 15.

[182] European Labour Authority (2025), Posting of third-country nationals: contracting chains, recruitment patterns, and enforcement issues. Insights from case studies, ELA Strategic Analysis, Publications Office of the European Union, Luxembourg.

Type of impacts	Summary of assessment
Social	Recognition and validation systems can play an important role in supporting labour market integration, social inclusion and full use of the qualifications and experience of TCNs. However, fragmented procedures, lack of transparency, delays and burdensome requirements currently limit these outcomes in many Member States. PO 1 is expected to improve these conditions, but only to a limited extent. For **TCNs**, clearer information and more accessible guidance may help individuals better understand available pathways, prepare documentation earlier and navigate procedures with greater confidence. In some Member States, benchmarking and mutual learning may encourage more inclusive administrative practices and better user support. Pre-departure assistance under Talent Partnerships may also improve preparedness before arrival and contribute to attracting talent by increasing trust in EU procedures and opportunities. These changes may support faster access to employment matching qualifications, reduce periods of inactivity or underemployment, and modestly lower risks of deskilling or "brain waste". This is particularly relevant given the persistently high levels of over-qualification among TCNs in the EU. As mentioned in Section 3.4, in 2023, the overqualification rate for employed TCNs with a tertiary level reached 39.4%, compared with 31.3% for other EU citizens and 20.8% for nationals183. Highly skilled TCNs are therefore significantly more likely to work below their qualification level and remain overrepresented in essential but often lower-skilled occupations184, suggesting continued inefficiencies in the use of available human capital and potentially undermining the EU's capacity for attracting talent. For **employers**, especially in sectors experiencing shortages such as healthcare, even limited improvements in recognition systems may help facilitate the integration of qualified workers and improve access to services over time. For **CAs**, peer learning and better guidance may encourage more transparent and user-oriented systems, which can strengthen trust and accessibility. However, the overall social impact is expected to remain limited because the measures are voluntary and do not create binding procedural rights, common deadlines or enforceable simplification standards. Outcomes are therefore likely to vary significantly depending on national uptake and implementation. Overall, PO 1 is therefore expected to have a limited positive social impact.

[183] EUROSTAT (2024) 'Almost 40% of non-EU citizens over-qualified in 2023', 26 July. Available at: https://ec.europa.eu/eurostat/web/products-eurostat-news/w/ddn-20240726-1

[184] PC analysis Annex 10. . Q26 "Do you think there are other issues that make it harder for people to have their skills and qualifications understood, recognised and valued in another country? Please, elaborate" (n=486); Eurostat (2023). Main obstacles for foreign-born people to enter the labour market. Available at: 108006.pdf

Type of impacts	Summary of assessment
Economic	Effective recognition and validation systems can contribute to better labour market matching, more efficient use of skills, faster labour market entry and improved access for employers to qualified workers from outside the EU, thereby supporting the EU's attractiveness of talent. However, current fragmentation, delays and uncertainty reduce these economic benefits. PO 1 is expected to improve these conditions, but only to a limited extent. For **employers**, especially in sectors affected by labour and skills shortages, clearer information and somewhat more predictable procedures may support recruitment planning and increase willingness to recruit TCNs through formal channels and reinforce the EU's capacity for attracting talent internationally. Evidence coming from the Public Consultation suggests that employers continue to rely heavily on documentary evidence, formal recognition and comparability statements, while the validation of informal and non-formal skills remains less systematically embedded in recruitment practices. This indicates that trust continues to be largely grounded in traditional qualifications and formal recognition frameworks, making greater transparency and comparability particularly relevant for SMEs and employers less familiar with national recognition systems.[185] For **TCNs**, better guidance and more transparent procedures may facilitate earlier labour market entry and improve the likelihood of working in occupations more closely matched to their qualifications. This may reduce underemployment and support higher productivity through better use of existing skills. **For CAs**, benchmarking, peer learning and common templates may slightly improve administrative efficiency and case handling practices, potentially lowering processing times or reducing avoidable workload in some Member States. However, the overall economic impact is expected to remain limited as the effects PO 1 are likely to depend on voluntary uptake by Member States and may therefore remain uneven.

[185] PC Results. Q53: When recruiting candidates from other countries, what sources of information do you use to identify their skills and qualifications, and do you trust these sources? (n=20) answers: I ask candidates to have their skills validated (assessed and certified) by a competent authority (3);I generally trust credentials obtained from short training courses (e.g. micro-credentials) (3); I contact previous employers for references or verification (6); I trust micro-credentials when I can identify the training provider, the learning outcomes, and how the credential was quality assured (7); I rely mainly on applicants' self-declared skills and qualifications (e.g. in their curriculum vitae or cover letter), even if I am not familiar with their country's education system or labour market. (8); I assess candidates' skills myself as part of the recruitment process (e.g. through competency-based interviews, tests, or assessment centres) (8); I ask candidates to obtain formal recognition or a statement of comparability from the relevant authority in my country (9); I always conduct interviews to assess candidates' attitude and potential (9); I trust credentials issued by an official authority that has assessed and certified (validated) the candidate's skills (12); I ask candidates to provide proof of their qualifications (e.g. copies of diplomas or certificates) (15).; in European Commission (2026). *Study Supporting an Impact Assessment of EU rules for the recognition of qualifications and validation of skills of third country nationals. Public Consultation Analysis*.

Type of impacts	Summary of assessment
Fundamental rights	Recognition and validation procedures are closely linked to the effective enjoyment of several rights and principles, including equal treatment, fair and transparent administrative processes, access to employment opportunities, and the practical ability to use one's qualifications and skills in the labour market. These elements are also relevant for attracting talent, influencing the willingness of skilled TCNs to choose the EU. While the existing legal framework already provides safeguards, current fragmentation, lack of clarity and procedural complexity may limit the effective exercise of these rights in practice. PO 1 is expected to improve these practical conditions to a limited extent. For **TCNs**, clearer information and better guidance may make procedures easier to understand and more accessible, supporting also EU's objective of attracting talent. Recommendations on documentation, fees and timelines may encourage more proportionate administrative practices in some Member States, thereby improving predictability and fairness. For **CAs**, benchmarking and peer learning may promote more transparent and user-oriented administrative behaviour, while stronger trust and comparability tools may support more consistent treatment of applicants. For **employers**, the impact on fundamental rights is indirect, but clearer and fairer systems may contribute to more equal access to labour market opportunities and smoother integration pathways. Overall, PO 1 is therefore expected to have a limited positive impact on fundamental rights.

6.1.3 Assessment of PO 2: Common rules to streamline procedures

The following table provides a summary assessment of the expected impacts of policy option 2. A complete assessment, clearly presenting supporting evidence, is included in Annex 15.

Type of impacts	Summary of assessment
Social	Current fragmentation, delays, lack of transparency and burdensome procedures can hinder labour market integration, social inclusion and fuller use of the qualifications and experience of TCNs. PO 2 is expected to improve them to a moderate extent, more consistently than PO 1. For **TCNs**, clearer and more predictable procedures may facilitate faster access to employment corresponding to qualifications and experience. Reduced administrative burdens and lower costs may improve access for applicants who are currently discouraged by complex systems, supporting the attractiveness of talent from outside the EU through more accessible pathways. This may help reduce inactivity, underemployment and deskilling. For **employers**, especially in sectors facing shortages such as healthcare, education, engineering or technical occupations, faster integration of qualified workers may improve workforce availability, access to services, and the EU's competitiveness in attracting talent globally. Evidence from the Flash Eurobarometer 529 highlights that around 39% of SMEs indicate that simpler procedures for recognising foreign qualifications could at least moderately support recruitment[186], suggesting that reducing administrative complexity may generate tangible benefits in sectors facing persistent shortages. For **CAs**, more coherent systems may support fairer and more transparent treatment of applicants, strengthening trust in public administration. Compared with PO 1, the expected impact is stronger because the measures are binding and therefore more likely to generate broad-based improvements across Member States rather than isolated progress. However, impacts are expected to remain moderate rather than transformative. Broader barriers linked to language requirements, labour market integration, discrimination or migration status would still affect outcomes and lie outside the scope of recognition rules alone.
Economic	Efficient recognition and validation systems are important for improving labour market matching, supporting productivity, reducing skills shortages and enabling employers to access qualified workers from outside the EU. Current fragmentation, delays and uncertainty limit these benefits. PO 2 is expected to improve economic outcomes to a moderate extent, with broader and more consistent effects than PO 1. For **employers**, especially in sectors facing persistent shortages such as healthcare, construction, engineering, ICT and other regulated professions, clearer and faster procedures may improve recruitment planning, reduce vacancy durations and widen access to qualified talent from third countries, thereby strengthening the EU's capacity of attracting talent internationally. This is particularly relevant in the current context of slowing employment growth and persistent labour market constraints, which increasingly weigh on production capacity and limit companies' ability to expand. Evidence suggests that, although EU real GDP growth is projected to reach around 1.8% by 2026, employment growth is expected to slow to approximately 0.5%[187], highlighting the risk that labour and skills shortages may continue to constrain economic performance in sectors already facing structural workforce gaps. For **TCNs**, quicker and more predictable recognition may facilitate earlier labour market entry and improve the likelihood of employment at a level corresponding to qualifications and skills. This may reduce overqualification and support stronger productivity through better use of human capital. For **CAs**, common procedural rules and shared trust tools may improve administrative efficiency, reduce repetitive case handling and lower transaction costs linked to fragmented systems. Compared with PO 1, the expected impact is stronger because the measures are binding and therefore more likely to generate consistent reductions in labour market frictions across Member States. However, impacts are expected to remain moderate rather than transformative. Labour demand conditions, wage differentials, language requirements, migration rules and profession-specific licensing conditions would continue to influence outcomes. Overall, Policy Option 2 is therefore expected to have a moderate positive economic impact.

[186] European Commission (2023), Flash Eurobarometer 529 – European Year of Skills: Skills shortages, recruitment and retention strategies in SMEs.
[187] European Labour Authority (2025), EURES Report on labour shortages and surpluses 2024, Publications Office of the European Union, Luxembourg.

Type of impacts	Summary of assessment
Fundamental rights	Recognition and validation procedures are closely linked to the practical enjoyment of several rights and principles, including fair and transparent administrative treatment, equality of opportunity, access to employment, and the effective ability to make use of one's qualifications and skills. Current fragmentation, delays, unclear requirements and uneven practices may limit the effective exercise of these rights in practice. PO 2 is expected to improve these conditions to a moderate extent. For **TCNs**, clearer procedures, binding timelines and more proportionate documentation requirements may strengthen legal certainty, accessibility and fairness. Lower administrative burdens and more transparent fee structures may also improve practical access to recognition pathways. For **CAs**, common procedural standards may support more consistent treatment of applicants across Member States, while preserving national decision-making powers. Stronger trust and comparability tools may also reduce arbitrary variation linked to lack of information. For **employers**, the impact on fundamental rights is indirect, but clearer and fairer systems may improve equal access to labour market opportunities and facilitate more inclusive recruitment pathways. Compared with PO 1, the expected impact is stronger because the measures are binding and more likely to ensure consistent minimum procedural safeguards across Member States. However, impacts are expected to remain moderate rather than complete. Broader barriers linked to language requirements, labour market discrimination, migration status or profession-specific restrictions would still affect outcomes and lie partly outside the scope of recognition rules alone. Overall, PO 2 is therefore expected to have a moderate positive impact on fundamental rights.

6.1.4 Assessment of PO 3: Common rules including automatic recognition for selected profession (building on Option 2)

The following table provides a summary assessment of the expected impacts of policy option 3. A complete assessment, clearly presenting supporting evidence, is included in Annex 15.

Type of impacts	Summary of assessment
Social	Recognition and validation systems play a central role in labour market integration, social inclusion and the effective use of qualifications and experience of TCNs. Current delays, fragmented procedures and uncertainty can lead to prolonged inactivity, underemployment and deskilling. PO 3 is expected to generate the strongest positive social impacts among the other options. For **TCNs**, substantially faster and more predictable recognition pathways may improve access to employment matching their qualifications and skills, reduce periods of inactivity and strengthen long-term labour market integration. For **employers**, especially in sectors facing shortages such as healthcare, education or technical professions, quicker mobilisation of qualified workers may improve service continuity, access, and, in turn, the EU's ability for attracting talent. For **CAs**, more efficient systems may strengthen transparency and responsiveness, contributing to greater trust in public administration. Compared with PO 2, the impact is expected to be stronger as PO 3 not only improves procedures, but it introduced automatic recognition that would improve recognition procedures and outcomes. This is particularly relevant in the context of increasing global competition for talent, where countries such as Australia, Canada and New Zealand are positioned as frontrunners in attracting highly skilled workers.[188] OECD evidence indicates that only one EU Member State ranks among the top five most attractive OECD destinations for highly educated workers, highlighting the EU's comparatively weaker position in global talent attraction.[189] As mentioned in Section 3, in this context, recognition of qualifications, labour market integration and legal pathways to stable employment are key determinants of attractiveness, meaning that inefficient and fragmented recognition systems contribute to underutilisation of skills and reduced ability of the EU to compete for global talent. Overall, PO 3 is therefore expected to have a significant positive social impact.
Economic	Efficient recognition and validation systems are important for improving labour market matching, reducing skills shortages, increasing productivity and enabling employers to access qualified workers from outside the EU. Current delays, fragmented procedures and uncertainty reduce these benefits. PO 3 is expected to generate the strongest positive economic impacts among the options. For **employers**, especially in sectors facing persistent shortages such as healthcare, construction, engineering, ICT and other regulated professions, substantially faster and more predictable recognition may widen access to qualified talent, reduce vacancy durations and improve workforce planning. This is particularly relevant in the current context of persistent labour market imbalances, which negatively affect both employers and workers. For employers, shortages may increase turnover costs and constrain production capacity and growth potential. In this context, evidence suggests that a large majority of companies consider difficulties in recruiting workers with appropriate skills to be a major obstacle to long-term investment,[190] underlining the potential economic value of more effective and predictable recognition systems and their contribution to attracting talent. For **TCNs**, quicker recognition and better matching between qualifications and occupations may support earlier labour market entry, higher earnings potential and more productive use of existing human capital. For **CAs**, the reduction of routine case-by-case assessments for professions within scope may improve administrative efficiency and allow resources to be redirected towards complex cases, enforcement or quality control. Compared with PO 2, the impact is expected to be stronger as PO 3 not only improves procedures but creates more direct access routes for selected professions, thereby reducing labour market frictions more substantially. Overall, PO 3 is therefore expected to have a significant positive economic impact.

[188] MPF (2024). Cultivating talent: Exploring effective talent attraction and retention practices in and beyond the EU. Brussels: ICMPD

[189] OECD (2023) *What is the best country for global talents in the OECD?* Migration Policy Debates 29. Paris. Available at: https://www.oecd.org/en/publications/what-is-the-best-country-for-global-talents-in-the-oecd_5186ab2d-en.html

[190] European Labour Authority (2025), EURES Report on labour shortages and surpluses 2024, Publications Office of the European Union, Luxembourg.

Type of impacts	Summary of assessment
Fundamental rights	Recognition and validation procedures are closely linked to the practical enjoyment of several rights and principles, including fair and transparent administrative treatment, equality of opportunity, access to employment, and the effective ability to use one's qualifications and skills. Current fragmentation, lengthy procedures, unclear requirements and uneven practices may limit the practical exercise of these rights. PO 3 is expected to generate the strongest positive impacts among the options. For **TCNs**, substantially clearer, faster and more predictable pathways may strengthen effective access to recognition systems, reduce barriers that currently prevent individuals from using their qualifications in practice, and support the EU's objective of attracting talent through more accessible procedures. For eligible professions, automatic or highly facilitated recognition may significantly improve legal certainty and equal access to professional opportunities. For **CAs**, common trust frameworks and clearer procedural architecture may support more consistent treatment of comparable applicants across Member States, while preserving necessary safeguards linked to public interest objectives. For **employers**, the impact on fundamental rights is indirect, but fairer and more transparent systems may improve equal access to labour market opportunities and contribute to more inclusive recruitment pathways. Compared with PO 2, the impact is expected to be stronger as PO 3 not only improves procedural safeguards but, for selected professions, substantially reduces practical barriers to access. Overall, PO 3 is therefore expected to have a significant positive impact on fundamental rights.

6.2 Costs and cost-savings

This section presents the analytical framework used to estimate the potential costs, cost-savings and broader welfare effects associated with the three policy options. Given the fragmented nature of the available evidence and the absence of harmonised EU-wide administrative datasets on recognition procedures for third-country qualifications, the analysis combines survey evidence, consultation findings, administrative data and scenario-based modelling assumptions in line with Better Regulation Toolbox practice.

6.2.1 Conceptual framework

Estimating the impacts associated with the policy options requires combining multiple sources of evidence, including survey data, stakeholder consultation findings, administrative information and scenario-based assumptions. Given the absence of harmonised EU-wide datasets on recognition procedures for third-country qualifications, the analysis adopts an order-of-magnitude approach consistent with Better Regulation Toolbox practice. This section presents the assessment of the costs and cost-savings of the three policy options envisaged for Action 3. The analysis is based on the methodology set out in Annex 4.5, which presents in depth: (1) the conceptual framework; (2) the construction of the per-procedure baseline and the segmentation of the procedural population between the sectoral subgroup — the seven professions covered by automatic recognition under Title III, Chapter III of Directive 2005/36/EC — and the general system subgroup; and (3) the four-level structure of the cost analysis (direct per-

procedure costs at Level 1, competent-authority overhead costs at Level 2, social and opportunity costs at Level 3, and qualitative dimensions at Level 4).

Consistent with the Better Regulation Toolbox methodology on the identification of impacts and on Cost-Benefit Analysis, the impacts of the policy options are presented along the standard direct/indirect benefits and costs categories. In this section, the term 'cost-savings' refers to benefits, while implementation costs refer to costs. The three analytically distinct benefit dimensions considered are: (i) direct administrative savings on recognition procedures for applicants, competent authorities and migration authorities conducting qualification checks within admission decisions; (ii) welfare gains associated with the reduction in processing times and the corresponding reduction in forgone earnings during the waiting period; and (iii) broader economic effects associated with the improved utilisation of qualifications within the labour market. The 'Level 1 / Level 2 / Level 3' labels used elsewhere in the section map onto these benefit dimensions and are retained for cross-reference with the analytical layers of Annex 4.5; they do not constitute a separate taxonomy. These dimensions differ in terms of methodological robustness, observability and degree of behavioural uncertainty, and are therefore presented separately throughout the analysis

Direct administrative savings are estimated on the basis of observable procedural cost components documented through the dedicated surveys and focus groups, while welfare and broader economic effects rely on scenario-based estimations calibrated through triangulated evidence and should therefore be interpreted as indicative orders of magnitude rather than precise forecasts. This methodological asymmetry is common in regulatory impact assessment: it does not materially affect the comparative ranking of the policy options, which remains stable across the sensitivity dimensions tested, but it informs the linguistic register adopted throughout this section, where granular and observable values are reported as approximations and aggregate or modelled values are reported as orders of magnitude.

The analysis distinguishes between three categories of cost- effects accordingly. First, administrative cost savings on existing procedures, calculated as percentage reductions in the per-procedure baseline of approximately EUR 1,500 (the pooled mean of the applicant-side and CA-side cost components, with the underlying distributions reported through a two-part summary in Annex 4.5 to preserve the analytical distinction between the fee-waived and fee-charging regimes documented in the cleaned distributions[191]). The EUR 1,500 baseline reflects the heterogeneity of recognition procedures and the variation in cost components across different procedural routes, as documented in Annex 4.5. Second, welfare gains from the reduction in processing time, calculated as the reduction in forgone earnings during the recognition waiting period for the share

[191]The two-part summary distinguishes the extensive margin (the share of respondents reporting positive vs zero costs) from the intensive margin (the level of the cost conditional on a positive cost being incurred). The methodological references and the application to the underlying CA Q17, TCN Q18 and NARIC Q12 distributions are documented in Annex 4.5.

of applicants either not working or working below their qualification level during the procedure. Third, one-off and recurring implementation costs at EU level (e.g. development of the EU level assessment of authentication service) and at Member State level (adaptation of national systems), analysed using the two-layer approach documented in Annex 4.5.

The three categories of cost effects are brought together within a comparative impact framework per policy option, presented as scenario ranges (low/central/high) reflecting the sensitivity of the estimates to the underlying assumptions on the realisation factor, and the share of procedures where the per-procedure cost saving materialises. The administrative cost-savings are estimated on a single baseline of approximately 62,500 recognition procedures per year — the volume of procedures taking place in the absence of EU action — consistent with the volume framework set out in Annex 4.6. The aggregate estimates reported in the comparative summary at the end of this section are derived as midpoints of the reported scenario ranges and used consistently across all three policy options.

The baseline against which the policy options are assessed is the situation in the absence of EU action. On the evidence assembled for this study, approximately 62,500 recognition procedures involving third-country nationals take place each year under that baseline. This figure is the central value of a 40,000–85,000 interval, triangulated from five independent channels — the competent-authorities survey, the EMN Ad-Hoc Query 2024.16 administrative data on medical-doctor recognition, the BIBB official statistics on the recognition caseload of third-country nationals in Germany, the Eurostat first-permits-by-remunerated-activity dataset (migr_resocc) and the focus-group data forms — and documented in full in Annex 4.6. The administrative cost-savings reported in this section are the savings on these procedures: a lower cost per procedure, applied to the procedures that already take place each year.

A distinct question is how many further third-country nationals, currently dissuaded from applying by the cost, length and unpredictability of the procedure, would come forward once those barriers are reduced. The consultation evidence points to latent demand of this kind, which the volume framework in Annex 4.6 places in the order of an additional 30,000 to 35,000 procedures per year at the upper end of the policy options. These additional procedures are not a cost-saving: they do not take place under the baseline, so there is nothing to save on them. When they take place, they generate costs — lower per-procedure costs than at present, but costs nonetheless — which are reflected in the implementation and recurring-cost estimates. Their value lies on the benefit side: each previously dissuaded third-country national who obtains recognition gains earlier access to qualification-matched employment, with a corresponding welfare gain for the individual and for the host labour market. This activation effect is reported as a distinct, benefit-side dimension in Annex 4.6 and in the applicant-side analysis below and is kept separate from the administrative cost-saving

figures, which are calculated solely on the procedures taking place under the baseline.

The welfare-gain and cost-saving estimates presented in this section do not assume any increase in the total number of TCN migration applications. The initiative does not interfere with the competence of Member States to decide how many, and which kind of, third-country nationals they wish to admit. The activation effect documented in Annex 4.6 provides an analytical representation of the potential activation of currently dissuaded but already-present (or already-arriving) third-country nationals who may enter the recognition system as active applicants under a more accessible and predictable framework, within unchanged migration flows; it does not represent additional migration. All estimates therefore rely on a deliberately conservative assumption with respect to the total volume of TCN recognition procedures.

In particular, the welfare-side estimate does not value the full gross monthly wage over the entire reduction in the waiting period for the whole inactive share of the flow: such a reading would substantially overstate the effect. The estimate applies instead the forgone-earnings differential — applicants working below their qualification level during the procedure still earn part of a wage — recognises that the waiting period is only partially unproductive and applies a scenario discount. These modelled adjustments place the welfare-side estimate firmly in the register of an order-of-magnitude scenario value rather than a deterministic forecast.

6.2.2 Cost and costs savings estimates by PO

The estimates presented below are intended to illustrate the comparative scale and direction of the expected impacts under each policy option rather than to provide precise forecasts. The analytical framework combines observable procedural costs with behavioural and implementation assumptions derived from consultation evidence, survey findings and comparative policy analysis.

6.2.2.1 PO 1 – Soft-law measures and capacity building

Policy Option 1 introduces fourteen non-binding measures (B1–B14) supporting the recognition of qualifications of third-country nationals through capacity building, mutual learning, soft-law guidelines, information dissemination, fraud verification support, pre-departure orientation and awareness-raising activities. The measures address all three drivers of the problem (D1 — diverging recognition systems; D2 — complex and burdensome procedures; D3 — lack of trust and understanding) through soft-law instruments without amending the existing legal framework. The cost impact is therefore concentrated on three dimensions: marginal Member State-level participation costs in EU-funded peer learning and capacity building activities; EU-level investment costs, both

recurring (EU-funded mutual learning, capacity building and information exchanges under B1, B4 and B13; EU funding to facilitate pre-departure support under Talent Partnerships, B11) and one-off (EU-funded comparative studies on national practices under B1; improved EU-level information provision for individuals and employers under B6; additional comparisons of TCQs frameworks with the EQF under B12; support to further ETF work on transparency, comparability and quality assurance of TCQs and credentials under B14); and partial reduction in the per-procedure burden through improved information availability (for both applicants and competent authorities), capacity building and standardisation of voluntary best practices.

On the per-procedure dimension, the savings range is calibrated at 4–8 per cent of the EUR 1,500 baseline, reflecting the partial reduction in document preparation effort enabled by improved information availability (measure B8 — recommendations on proportionate documentation and translation requirements and exchange of best practices among Member States; the information-provision element is also supported by measure A3 on minimum mandatory information requirements), and the partial reduction in CA-side verification effort enabled by capacity building on third-country qualification systems (B10, B11, B12, B13, B14). The realisation factor of 60 per cent reflects the soft-law character of the measures and the partial uptake of voluntary EU instruments documented in the parallel Action 2 work and in question 37 of the CA survey, (n = 94–118 across the four cost items), in which no respondent selected “no change” on any item and the modal expectation was a small decrease in internal staffing costs but a small increase in the costs of third-country cooperation and information exchange. This is consistent with the conservative 60 per cent realisation factor for the soft-law option; these items concern competent-authority overhead costs and as recorded in the evidence table in this section, do not enter the per-procedure standard-cost calculation[192]. Per-procedure savings under Policy Option 1 are therefore approximately EUR 36–EUR 72 per procedure (central scenario approximately EUR 54), corresponding to an aggregate annual administrative saving of approximately EUR 2.2–EUR 4.5 million per year on the baseline of 62,500 procedures per year. The welfare gain from processing time reduction is more limited under Policy Option 1, since no binding deadline is introduced: an indicative time gain of approximately 1.4 months (10 per cent of the 14.2-month actual baseline) yields an annual welfare gain in the order of

[192] The realisation factor follows a constant-baseline approach (constant baseline volume; gap closure = legal-deadline reduction × realisation factor). For Policy Option 1 the 60 per cent value reflects the soft-law, voluntary character of the measures and is triangulated from the activation evidence for non-binding instruments (an indicative 5–10 per cent activation of the latent pool, supported by the FG2/FG4 focus-group polls and a voluntary-uptake discount), the parallel Action 2 evidence, and question 37 of the competent-authority survey (“How would an EU action aiming to streamline the recognition of third-country qualifications held by TCNs impact the following costs for your organisation?”; source: DG EMPL_SPI_Action 3 — analysis of surveys targeted at CAs, sheet “System”). Across the four cost items the valid responses were n = 94 (internal FTEs), 116 (digitalisation), 111 (third-country cooperation) and 118 (information exchange); no respondent selected “no change” on any item; the modal response was “small decrease” for internal staffing costs (38/94 and 37/116) and “small increase” for third-country cooperation (50/111) and information-exchange costs (54/118). Question 37 documents competent-authority overhead costs and does not enter the per-procedure standard-cost calculation. The realisation factor is an indicative, order-of-magnitude scenario assumption and is varied in the sensitivity analysis.

magnitude of EUR 33.5 million per year on the baseline. EU-level one-off implementation costs under Policy Option 1 are estimated at approximately EUR 1–EUR 3 million for the development of soft-law instruments and capacity building infrastructure; Member State-level one-off costs are marginal (limited to participation in EU-funded peer learning and capacity building activities).

Table 5 - Policy Option 1: costs, cost-savings and welfare effects summary.

Dimension	Low	Central	High
Direct administrative effects			
Per-procedure savings (EUR per case, post-realisation)	approx. EUR 36	approx. EUR 54	approx. EUR 72
Aggregate annual administrative savings (EUR M)	approx. 2.2	approx. 3.4	approx. 4.5
EU-level one-off implementation cost (EUR M)	approx. 1.0	approx. 2.0	approx. 3.0
MS-level one-off implementation cost per MS (EUR k)	marginal	marginal	<50
Welfare-side and broader economic effects (indicative orders of magnitude)			
Welfare gain Level 3 (EUR M)	o.m. 33.5	o.m. 273.5	o.m. 300
GDP-equivalent gain (EUR M)	o.m. 47	o.m. 380	o.m. 417

Note: Direct administrative effects are reported as approximations derived from observable cost components; welfare-side and broader economic effects are reported as orders of magnitude ("o.m.") reflecting their scenario-based and modelled nature. The welfare gain (Level 3) and the GDP-equivalent gain are alternative representations of the same time-saving effect and are not summed. The aggregate impact estimate incorporates only the welfare gain (Level 3), not the GDP-equivalent measure, so the same effect is not counted twice.

Source: elaboration based on TCN survey, CA survey, NARIC survey, MA survey, focus group DataForms and Eurostat earn_ses22_28 and nama_10_a64.

6.2.2.2 PO 2 – Binding common procedural rules

Policy Option 2 introduces ten binding measures (A1–A10) establishing common procedural rules at EU level for the recognition of qualifications of third-country nationals. The measures address all three drivers of the problem through structural interventions on the directive framework: common procedural rules (A1, A3), binding deadlines for recognition decisions (A4, with 3–4 months for general system procedures from receipt of complete dossier), harmonised documentation requirements (A5), proportionate fee structure with transparency requirements (A2, A9), an EU comparability database for skills, qualifications and certifications across third countries (A6, with mandatory consultation by national CAs), an EU authenticity check service for third-country qualifications (A8, open to national CAs on demand), provisions for compensation measures (A7), binding coordination requirements between recognition and migration authorities (A2 sub-component), and a structured framework for capacity building accompanying the binding measures (A10).

On the per-procedure dimension, the savings range is estimated at 15–22 per cent of the EUR 1,500 baseline, reflecting the structural reduction in document preparation effort enabled by harmonised documentation requirements (A5), the structural reduction in CA-side verification effort enabled by the EU comparability database (A9) and the EU authenticity check service (A8), and the structural reduction in the application fee component enabled by the proportionate fee structure (A7), the multilingual document acceptance reducing translation needs (A6) and the minimum mandatory information requirements (A3). The realisation factor of 75 per cent reflects the binding but transposition-discretionary character of the measures, consistent with EU impact assessment precedents for partial harmonisation directives (e.g. the IA accompanying Directive 2013/55/EU revising the Professional Qualifications Directive, and the IA accompanying the Services Directive 2006/123/EC). The largest saving is concentrated on the certified translation component (where the harmonised documentation requirements (measure A5), together with the obligation to accept documents in more than one language including a language frequently used by migrants (measure A6) and the minimum mandatory information requirements (measure A3), would reduce the number of documents to be translated by approximately one third (the one-third calibration reflects the reduction of the certified-translation set from the typical regulated-profession dossier of approximately 6–9 documents to a harmonised minimum set of approximately 4–6 documents, cross-validated with CA survey Q17 — 125 of 190 competent authorities identifying certified translation as a typical cost component — and with the documentation requirements mapped in Annex 8.5) and on the application fee component (where the proportionate fee structure would reduce the fee level for the procedures currently in the high-end of the distribution).

Per-procedure savings under Policy Option 2 are therefore approximately EUR 169–EUR 247 per procedure (central scenario approximately EUR 208), corresponding to an aggregate annual administrative saving of approximately EUR 10.6–EUR 15.4 million per year on the baseline of 62,500 procedures per year. The welfare gain from the processing time reduction is substantially larger under Policy Option 2, driven by the binding deadline of 4-5 months for general system procedures: an indicative time gain of approximately 9 months (from 14.2 months actual baseline to 5 months target) yields an annual welfare gain in the order of magnitude of EUR 273.5 million per year on the baseline. This 14.2-month figure reflects the full duration of the recognition process from the applicant's perspective — from the start of document gathering to the final outcome, including, where applicable, the completion of compensation measures — and is used as such for the welfare-gain estimate. It is distinct from the narrower perimeter to which a procedural deadline applies, namely the time from a complete application to a first decision by the competent authority; on that narrower perimeter the competent-authorities evidence indicates a shorter duration (approximately 40 per cent of competent authorities reporting one to three months and approximately 36 per cent reporting three to six months). The

reduction associated with the binding deadline is therefore assessed on this narrower first-decision perimeter, while the 14.2-month figure is retained for the welfare-side valuation of the full process. This processing-time evidence relates to recognition in the context of regulated professions. EU-level one-off implementation costs under Policy Option 2 are estimated at approximately EUR 8–EUR 15 million for the development of the EU comparability database and the EU authenticity check service; Member State-level one-off costs are estimated at approximately EUR 200,000–EUR 500,000 per Member State for the adaptation of national recognition systems. Across the 26 Member States within the study perimeter (Denmark is outside the scope of the initiative), this corresponds to an aggregate one-off cost in the order of EUR 5–13 million and aggregate recurring Member State-level cost across the 26 Member States in the order of EUR 0.5–1.3 million per year. The per-Member-State figure is not uniform: Member States with a larger share of TCN procedures sit towards the upper end of the range and those with a smaller share towards the lower end.

Table 6 - Policy Option 2: costs, cost-savings and welfare effects summary.

Dimension	Low	Central	High
Direct administrative effects			
Per-procedure savings (EUR per case, post-realisation)	approx. EUR 169	approx. EUR 208	approx. EUR 247
Aggregate annual administrative savings (EUR M)	approx. 10.5	approx. 13	approx. 15.5
EU-level one-off implementation cost (EUR M)	approx. 8	approx. 11	approx. 15
MS-level one-off implementation cost per MS (EUR k)	approx. 200	approx. 350	approx. 500
Welfare-side and broader economic effects (indicative orders of magnitude)			
Welfare gain Level 3 (EUR M)	o.m. 33.5	o.m. 273.5	o.m. 300
GDP-equivalent gain (EUR M)	o.m. 47	o.m. 380	o.m. 417

Note: Direct administrative effects are reported as approximations derived from observable cost components; welfare-side and broader economic effects are reported as orders of magnitude (“o.m.”) reflecting their scenario-based and modelled nature. The welfare gain (Level 3) and the GDP-equivalent gain are alternative representations of the same time-saving effect and are not summed. The aggregate impact estimate incorporates only the welfare gain (Level 3), not the GDP-equivalent measure, so the same effect is not counted twice.

Source: elaboration based on TCN survey, CA survey, NARIC survey, MA survey, focus group DataForms and Eurostat earn_ses22_28 and nama_10_a64.

6.2.2.3 PO 3 – Comprehensive reform with automatic recognition for sectoral professions

Policy Option 3 builds on the binding common procedural rules of Policy Option 2 (measures A1–A10) and adds two structural reforms (A11 and A12). Measure A11 introduces an automatic recognition channel for the seven sectoral

professions covered by Title III, Chapter III of Directive 2005/36/EC (doctor of medicine, nurse responsible for general care, dental practitioner, midwife, pharmacist, veterinary surgeon and architect), extending the channel to third-country qualifications meeting the relevant minimum training requirements and verification/trust conditions. Measure A12 introduces a digital credentials infrastructure integrated with the EU Digital Identity Wallet (Regulation 2024/1183) for the issuance, transmission and verification of qualification credentials of third-country nationals.

On the per-procedure dimension, the savings range is set at 33–47 per cent of the EUR 1,500 baseline, reflecting the structural reduction in document preparation effort, CA-side verification effort, application fee, certified translation effort and authenticity verification effort enabled by the combination of binding common rules, automatic recognition for sectoral procedures and digital credentials infrastructure. Policy Options 2 and 3 are both hard-law instruments. The realisation factor for Policy Option 3 is set at 85 per cent — ten percentage points above Policy Option 2 rather than twenty. Policy Option 3 is identical to Policy Option 2 except for the addition of the automatic-recognition component, which applies only to the sectoral subgroup and only progressively and selectively (one accredited third-country institution at a time, phased in over time as set out below). The ten-point differential therefore reflects exclusively this incremental, self-executing component — which leaves materially less transposition discretion than the general-system rules for the share it covers — and not any assumption that statutory deadlines are inherently easier to comply with under Policy Option 3 or that Policy Option 3 is implemented more fully than Policy Option 2 on the components the two options share. The 95 per cent value is retained as an upper-bound robustness check in the sensitivity analysis. The largest saving is concentrated on the sectoral subgroup (approximately 40 per cent of the TCN recognition flow, central scenario), where the automatic recognition channel reduces the per-procedure burden by approximately two thirds; the general system subgroup retains the 15–22 per cent saving from Policy Option 2, with the additional benefit of the digital credentials infrastructure on the verification component.

Per-procedure savings under Policy Option 3 are approximately EUR 420–EUR 600 per procedure (central scenario approximately EUR 510), corresponding to an aggregate annual administrative saving of approximately EUR 16.8–EUR 24.3 million per year on the baseline of 62,500 procedures per year (central approximately EUR 20.5 million). The comparative ranking is unchanged: Policy Option 3 remains several times larger than Policy Option 2 on this dimension. The welfare gain from the processing time reduction is the largest under Policy Option 3, driven by the combination of the 4-5 month deadline for general system procedures (inherited from Policy Option 2) and the structural reduction of the processing time for sectoral procedures from 14.2 months to approximately 4 months (the automatic-recognition deadline under the current Directive 2005/36/EC framework; sensitivity range 3-5 months): the resulting annual

welfare gain is in the order of magnitude of EUR 300 million per year on the baseline, on the four-month sectoral processing time and the realisation factor set out below. For the sectoral subgroup, automatic recognition removes the compensation-measure phase, so the full-process and first-decision perimeters defined above substantially coincide; the reduction to approximately four months is therefore assessed on a like-for-like basis. EU-level one-off implementation costs under Policy Option 3 are estimated at approximately EUR 15–EUR 25 million, reflecting the additional development effort for the digital credentials infrastructure relative to Policy Option 2; Member State-level one-off costs are estimated at approximately EUR 200,000–EUR 500,000 per Member State. At EU level, applying this per-Member-State range to the 26 Member States within the scope of the initiative — Denmark remains outside it — yields a one-off implementation cost in the order of EUR 5–13 million. This per-Member-State cost is not expected to be uniform: it falls towards the upper end of the range in the Member States handling a larger share of TCN procedures and towards the lower end where that share is smaller.

Given the higher degree of implementation heterogeneity and behavioural uncertainty characterising the third-country national recognition landscape compared to the existing intra-EU framework of Directive 2005/36/EC — reflecting the greater fragmentation of national procedures, the absence of a pre-existing EU-level legal architecture, and the structural diversity of bilateral cooperation arrangements with third countries documented in the MPF Mapping 2024 — the realisation factors of 60 per cent (Policy Option 1), 75 per cent (Policy Option 2) and 85 per cent (Policy Option 3; 95 per cent reported as an upper-bound sensitivity) should be interpreted as calibrated indicative assumptions rather than predictive implementation coefficients. Their function is to provide a transparent and replicable discount on the savings, not to forecast the precise share of procedures where the cost reduction will materialise. The robustness of the comparative ranking across the three policy options remains stable across the sensitivity range tested for the realisation factors, as documented in the dedicated sub-section.

Beyond the one-off implementation costs reported above, the policy options also generate recurring (medium-term and ongoing) costs, which are quantified here at order-of-magnitude level on the basis of benchmarks from comparable EU digital-infrastructure initiatives (Single Digital Gateway, European Digital Identity Wallet). Recurring EU-level costs are estimated in the order of EUR 0.5–1 million per year under Policy Option 1 (ongoing mutual learning and capacity building); EUR 2–3 million per year under Policy Option 2 (maintenance of the EU comparability database, operation of the authenticity-check service, continued capacity building); and EUR 3–5 million per year under Policy Option 3 (the Policy Option 2 components plus the recurring cost of operating the interoperability layer with third-country digital credentials). Recurring Member State-level costs are estimated in the order of EUR 20,000–50,000 per Member State per year under Policy Options 2 and 3 (staff time, system maintenance and coordination effort

with the EU-level services). Annualised over 2029-2040 horizon these recurring costs add in the order of EUR 3–7 million per year at system level and do not alter the comparative ranking, the welfare gains and administrative savings remaining an order of magnitude larger.

Issuance costs for verifiable digital credentials are borne by third-country institutions seeking accreditation, not by Member States or the EU. Verification-infrastructure costs at EU level are not included in the Action 3 cost estimates.

Automatic recognition under Policy Option 3 is awarded one third-country institution at a time, only to institutions that have applied for and obtained accreditation. The number of third-country nationals effectively benefiting from the automatic-recognition route is therefore initially very low and rises only gradually as institutions complete the accreditation process. The Policy Option 3 figures reported in this section are steady-state values, that is, the post-phase-in scenario. On an illustrative 2029-2040 phase-in — with the share of the sectoral subgroup effectively covered by accredited institutions rising from approximately 10 per cent in year 1 to approximately 50 per cent in year 5 and 80–90 per cent in year 10 (a profile calibrated on the analogous intra-EU phase-in) — the average annual welfare gain over the horizon is expected to be below the steady-state value, which is reported as the reference. The cost savings of Policy Option 3 on the sectoral subgroup are additional to, and do not replace, the cost savings already estimated for Policy Option 2; the comparative ranking is unaffected, as Policy Option 3 remains preferred to Policy Option 2 in every phasing scenario.

Table 7 - Policy Option 3: costs, cost-savings and welfare effects summary.

Dimension	Low	Central	High
Direct administrative effects			
Per-procedure savings (EUR per case, post-realisation)	approx. EUR 420	approx. EUR 510	approx. EUR 600
Aggregate annual administrative savings (EUR M)	approx. 16.8	approx. 20.5	approx. 24.3
EU-level one-off implementation cost (EUR M)	approx. 15	approx. 20	approx. 25
MS-level one-off implementation cost per MS (EUR k)	approx. 200	approx. 350	approx. 500
Welfare-side and broader economic effects (indicative orders of magnitude)			
Welfare gain Level 3 (EUR M)	o.m. 33.5	o.m. 273.5	o.m. 300
GDP-equivalent gain (EUR M)	o.m. 47	o.m. 380	o.m. 417

Note: Direct administrative effects are reported as approximations derived from observable cost components; welfare-side and broader economic effects are reported as orders of magnitude ("o.m.") reflecting their scenario-based and modelled nature. The welfare gain (Level 3) and the GDP-equivalent gain are alternative representations of the same time-saving effect and are not summed. The aggregate

impact estimate incorporates only the welfare gain (Level 3), not the GDP-equivalent measure, so the same effect is not counted twice.

Source: elaboration based on TCN survey, CA survey, NARIC survey, MA survey, focus group DataForms and Eurostat earn_ses22_28 and nama_10_a64.

6.2.2.4 Comparative summary

The comparative summary presented below aggregates the per-procedure administrative savings, the welfare gains and the implementation costs across the three policy options, on the baseline of 62,500 TCN recognition procedures per year. The values reported are central scenario estimates, with the corresponding sensitivity ranges documented in Tables 5–7 above and discussed in the dedicated sensitivity sub-section. Two complementary measures are reported. The first is the aggregate annual administrative saving, derived from observable per-procedure cost components and discounted by the realisation factor: approximately EUR 3.4 million per year under Policy Option 1, approximately EUR 13 million per year under Policy Option 2, and approximately EUR 20.5 million per year under Policy Option 3. Expressed as a present value over a ten-year assessment period and discounted at 3 per cent in line with the Better Regulation methodology (Tool #64), these savings correspond to approximately EUR 29 million, EUR 122 million and EUR 192.3 million respectively. The assessment period runs from the expected entry into application of the measures; for Policy Option 3 the progressive accreditation of third-country institutions under the automatic-recognition route implies that the average annual value over the horizon is expected to be below the steady-state figure, which is reported as the reference.

The second is the aggregate impact estimate (broad measure), which adds the welfare gain Level 3 and is therefore reported as an order of magnitude: in the order of magnitude of EUR 36 million per year under Policy Option 1, EUR 285 million per year under Policy Option 2, and EUR 318 million per year under Policy Option 3, net of the EU-level annualised implementation cost (assuming a 2029-2024 amortisation period). Member State-level implementation costs are presented separately and are not deducted from the aggregate impact estimate, given the substantial heterogeneity of national starting conditions, system maturity and integration pathways across Member States.

Policy Option 3 is assessed on a four-month sectoral processing time and an 85 per cent realisation factor. The quantified results are: per-procedure saving approximately EUR 420–600 (central approximately EUR 510); aggregate annual administrative saving approximately—EUR 16.8–24.3 million (central approximately EUR 20.5 million); welfare gain in the order of magnitude of EUR 300 million per year; aggregate impact estimate in the order of magnitude of EUR 318 million per year. Policy Option 3 is the preferred option, generating an aggregate impact several times larger than Policy Option 2 and an order of magnitude larger than Policy Option 1.

Table 8 - Comparative summary of costs, cost-savings and welfare effects across the three policy options.

Dimension	PO1 (central)	PO2 (central)	PO3 (central)
Direct administrative effects			
Per-procedure savings (EUR per case, post-realisation)	approx. EUR 54	approx. EUR 208	approx. EUR 510
Realisation factor	60%	75%	85%
Aggregate annual administrative savings (EUR M)	approx. 3.4	approx. 13	approx. 20.5
EU-level one-off implementation cost (EUR M)	approx. 2	approx. 11	approx. 20
EU-level annualised cost over 10 years (EUR M/year)	approx. 0.2	approx. 1.1	approx. 2.0
Welfare-side and broader economic effects (orders of magnitude)			
Welfare gain Level 3 (EUR M)	o.m. 33.5	o.m. 273.5	o.m. 300
Aggregate impact estimate (broad measure)			
Aggregate impact (EUR M, broad)	o.m. 36	o.m. 285	o.m. 318

Note: Direct administrative effects are reported as approximations derived from observable cost components; welfare-side effects are reported as orders of magnitude ("o.m.") reflecting their scenario-based nature. The aggregate impact estimate is calculated as the sum of administrative savings and welfare gain Level 3, net of EU-level annualised implementation cost (2029-2024 amortisation); the GDP-equivalent measure (reported in Tables 5–7 and discussed in Annex 4.5) is an alternative macro scaling of the welfare gain through a productivity lens and is not added to the aggregate impact estimate.

Source: elaboration. Central scenario estimates; sensitivity ranges are documented in Tables 5–7.

Table 9 — Present value of the administrative cost-savings over a 2029-2024 assessment period, discounted at 3 per cent in line with the Better Regulation methodology (Tool #64).

Policy Option	Annual administrative saving (EUR million)	Present value over 2029-2040s (EUR million)
Policy Option 1	approx. 3.4	approx. 31.9
Policy Option 2	approx. 13	approx. 122
Policy Option 3	approx. 20.5	approx. 192.3

Note: the present value is obtained by cumulating the annual administrative saving over an assessment period 2029-2040 and discounting it at 3 per cent, in line with the Better Regulation methodology (Tool #64); this corresponds to a cumulative discount factor of 9.38.

Source: authors' elaboration on the administrative cost-savings estimates reported in Tables 5–7, based on the Action 3 competent-authorities survey, the dedicated TCN survey and the focus-group data forms.

The comparative ranking of the three policy options on the cost-savings dimension is consistent across the three sensitivity scenarios documented in the dedicated sub-section. On the more robust direct administrative effects, the aggregate annual administrative savings of Policy Option 3 are substantially larger than those of Policy Option 1 and several times larger than those of Policy Option 2; this ranking remains stable across the sensitivity range tested and provides a comparatively robust reference point based on observable procedural cost components. On the broader aggregate impact estimate, which incorporates the welfare gain Level 3 as an order of magnitude, the relative magnitude is preserved: the aggregate impact of Policy Option 3 is substantially larger than

that of Policy Option 1 and several times larger than that of Policy Option 2. The consistency of the two measures in supporting the same comparative ranking reinforces the interpretation of the comparative assessment as robust to the methodological asymmetry between the observable administrative dimension and the scenario-based welfare dimension.

6.2.2.5 Applicant-side burden reduction across policy options

Beyond the aggregate cost-savings reported in the comparative summary, the policy options have a direct impact on the burden borne by the third-country national applicants. The analysis is conducted on the basis of the dedicated TCN survey question 18 (cost of recognition procedure, n=151, bin-midpoint mean EUR 1,285) and question 13 (processing time, pooled n=182, mean 14.2 months). The applicant-side burden is decomposed into three components: the direct cost of the procedure (Q18), the opportunity cost of the waiting period (calculated as the product of the processing time, the monthly opportunity cost proxy and the share of applicants either not working or working below their qualification level), and the indirect cost of procedural complexity (qualitatively documented through Q12 outcome and the deterrence rate).

Under Policy Option 1, the applicant-side burden is reduced by approximately 4–8 per cent on the direct cost component (fee transparency and proportionality guidance, clearer information on procedural requirements and harmonised documentation guidance) and approximately 10 per cent on the opportunity cost component (EU-level common guidance defining procedural steps and indicative maximum processing timelines, B7). The indicative combined applicant-side burden reduction is therefore in the range of EUR 100–EUR 200 per procedure on the central scenario. Under Policy Option 2, the applicant-side burden reduction reaches approximately 15–22 per cent on the direct cost component (fee transparency and proportionality requirements, harmonised documentation requirements) and approximately 70 per cent on the opportunity cost component (binding 3–4-month deadline reducing the waiting period from 14.2 months to 4 months on the central scenario). The indicative combined applicant-side burden reduction is therefore in the range of EUR 1,500–EUR 2,500 per procedure on the central scenario, with the welfare gain component substantially larger than the administrative cost saving component. Under Policy Option 3, the applicant-side burden reduction reaches approximately 33–47 per cent on the direct cost component (full effect of measures A1–A10, plus reduction of certified translation effort enabled by digital credentials A12) and approximately 90 per cent on the opportunity cost component for the sectoral subgroup (automatic recognition reducing the waiting period from 14.2 months to 3 months). The total applicant-side burden reduction is therefore in the indicative combined range of EUR 3,500–EUR 5,500 per procedure for the sectoral subgroup and EUR 1,800–EUR 2,800 per procedure for the general system subgroup.

The reduction in the applicant-side burden has a direct effect on the deterrence dimension documented in Annex 4.5 (Level 4) and in Annex 4.6 (latent intent rate analysis). The pooled latent intent rate of 39.8 per cent (range 30–56 per cent) provides the empirical anchor for the activation effect, calibrated as 5–10 per cent under Policy Option 1, 15–25 per cent under Policy Option 2, and 30–50 per cent under Policy Option 3 (sectoral subgroup). The activation effect may contribute to additional procedural volumes and associated welfare effects, which are documented in Annex 4.6 and in the volume framework rather than in the cost-savings analysis to avoid double-counting.

6.2.2.6 Employer-borne administrative costs

In addition to the costs borne by recognition applicants and public administrations, employers in the EU also incur administrative and organisational costs related to the recruitment of third-country nationals whose qualifications require recognition. These costs include the verification of the recognition outcome, the coordination with the migration authorities for the work permit procedure, the human resource management effort for the integration of the recognised professional in the workforce, and the indirect cost of the recruitment cycle prolongation due to the recognition processing time.

The Public Consultation employer/business/CSO/PA sub-sample (n=118, recruitment-related sub-sample n=20) provides the primary indicative anchor for the employer-borne dimension. The focus group FG5 polls (n=19–26) corroborate the qualitative pattern, with 70 per cent of respondents identifying procedural simplification and digital credentials as the main factors that would reduce the employer-borne burden. Position papers from Business Europe (2026) and SME United (2026) corroborate the relevance of TCN recognition for the attraction of qualified professionals to the EU labour market.

On the quantitative dimension, the employer-borne administrative cost is estimated at approximately EUR 800–EUR 1,200 per recruitment of a recognised TCN professional under the baseline scenario, drawing on the cross-validation between the parallel Action 2 SME Panel Survey (mean cost EUR 814 per non-national EU hire) and the focus group FG5 polls. This is an aggregate figure capturing the four cost components (verification of the recognition outcome, coordination with migration authorities, HR management effort for integration, indirect cost of recruitment-cycle prolongation), since the source figures are reported as a single overall cost. Under Policy Option 1, the employer-borne cost is reduced by approximately 5–10 per cent through improved employer-side information availability on the recognition outcome and on the coordination with migration procedures (B7 — common guidance on procedural steps and timelines; B6 — best-practice guidelines). Under Policy Option 2, the reduction reaches approximately 20–30 per cent, driven by the binding coordination requirements between recognition and migration authorities (measure A2) and by

the harmonised documentation requirements (A5). Under Policy Option 3, the reduction reaches approximately 35–50 per cent for recruitments involving the seven sectoral professions, driven by the automatic recognition channel (A11) and the digital credentials infrastructure (A12) which enable near-immediate verification by the employer.

Applied illustratively to an indicative volume of 62,500 recognition procedures per year of recognised TCN professionals (a sub-set of the 1.1 million first employment-related residence permits issued in the EU-27 in 2024, calibrated on the share of qualifications-related recruitments), the aggregate employer-borne cost saving is illustratively estimated in the order of magnitude of EUR 4.7 million per year under Policy Option 1, EUR 15.6 million per year under Policy Option 2, and EUR 20 million per year under Policy Option 3. The robustness level of the employer-borne cost estimate is moderate-to-low given the limited primary evidence (Public Consultation sub-sample size and focus group polls). These figures should be interpreted as an indicative complementary estimate and not as a core monetised component of the comparative ranking; accordingly, they are not added to the aggregate impact estimate reported in the comparative summary. The estimates are intended primarily as contextual indicators rather than as core quantified impacts.

6.2.2.7 Migration-related qualification checks for non-regulated professions

The administrative cost analysis presented above concerns recognition procedures for regulated professions, which constitute the population to which the time-related welfare effects also apply. A separate group of third-country nationals, however, undergoes qualification-related checks as part of migration procedures for access to non-regulated professions. In these cases, competent or migration authorities review diplomas, transcripts, evidence of professional experience, legalisations, apostilles or certified translations as part of the admission process, without a formal regulated-profession recognition requirement. Although these procedures do not involve formal professional recognition, they generate documentary and administrative costs that fall within the scope of this assessment. This component is quantified separately and reported alongside, and separately from, the regulated-profession results, with the two clearly distinguished.

The size of this population follows directly from the volume framework. Of the approximately 125,000 first residence permits issued each year for skilled workers that involve an element of qualification assessment — the sum of the EU Blue Card, the researchers' visa and the national highly-skilled migration pathways — approximately 62,500 relate to regulated professions and form the baseline used in the preceding analysis. The remaining share, of the order of 62,000 to 63,000 checks per year, consists of the migration-related qualification

checks for non-regulated professions described above. These checks generate administrative and documentary costs and therefore fall within the scope of the analysis, even though they are treated differently from the more extensive assessments associated with regulated professions.

This population is not homogeneous. In some Member States the procedure requires an extensive set of supporting documents, while in others admission rests on proxies such as salary thresholds, labour-market tests or employer sponsorship, with only a limited verification of educational attainment. Part of the residual population is therefore likely to be subject only to limited qualification verification, while other cases involve a more substantive assessment of educational credentials and professional experience. As these differences cannot be observed consistently across Member States, the estimate should be interpreted as an indicative average across a heterogeneous population rather than as a precise measure for a single type of procedure. On this basis, the average burden per procedure is estimated at around EUR 300. This is well below the EUR 1,400 to EUR 1,500 per-procedure baseline estimated for regulated professions, reflecting the lighter documentation requirements and the absence of a substantive assessment of the curriculum in this category.

No time-related welfare gains are attributed to these checks. Statutory processing times for work-related residence permits generally fall within a range of six to twelve weeks, and half of the migration authorities consulted reported that the additional time attributable to qualification checks is unknown. The link between a shorter procedure and earlier labour-market entry, which underpins the welfare estimate for regulated professions, cannot be established here. The benefits estimated for this component are therefore limited to administrative and documentary cost savings, and no welfare, labour-market entry or time-saving effects are attached to them.

The initiative nonetheless lowers documentary and administrative costs for these checks, by reducing the number of documents required, standardising the documents accepted and limiting the duplication of qualification evidence between the migration procedure and any subsequent recognition procedure. Applying reduction rates below those used for regulated professions — since the initiative acts here only on documentary and duplication costs, and not on a substantive assessment — yields the savings set out below. They are modest relative to those estimated for regulated professions and are reported separately, as a complementary component of the administrative burden analysis.

Table 10 – Migration-related qualification checks for non-regulated professions: estimated volume, per-procedure burden and indicative annual savings

Indicator	Value
Annual volume of migration-related qualification checks	~62,000–63,000
Indicative average burden per procedure	~EUR 300 (range EUR 200–700)

Indicator	Value
Indicative annual savings — Policy Option 1	EUR 0.5–0.8 million
Indicative annual savings — Policy Option 2	EUR 1.6–2.4 million
Indicative annual savings — Policy Option 3	EUR 3.1–4.8 million

Note: These estimates relate exclusively to migration-related qualification checks for non-regulated professions. They are reported separately from the regulated-profession model and are not included in the aggregate impact estimates, the preferred-option assessment or the comparative ranking of the policy options. Savings are reported as ranges, without a central point value, in keeping with the indicative nature of the estimate and the heterogeneity of the underlying population. Full methodological detail is set out in Annex 4.5.

Source: authors' elaboration based on the migration procedures mapping (Annex 9.3), the TCN and CA surveys and Eurostat migr_resocc.

6.2.2.8 Sensitivity analysis

The sensitivity of the cost-savings estimates to the underlying assumptions is tested across three dimensions: the realisation factor (varied by plus or minus 10 percentage points around the central value of each policy option), the volume baseline (the baseline of 62,500 procedures per year, varied across 40,000–85,000 procedures per year, with a prudential lower bound of approximately 35,000 procedures per year reported separately) and the processing time actual baseline (varied between the lower bound of 9 months, the central value of 14.2 months and the upper bound of 18 months as documented in Annex 4.5 Level 3).

On the realisation factor dimension, a downward variation of 10 percentage points reduces the per-procedure cost saving by approximately 17 per cent under Policy Option 1 (from 60 per cent to 50 per cent), 13 per cent under Policy Option 2 (from 75 per cent to 65 per cent), and 11 per cent under Policy Option 3) (from the central value of 85 per cent to 75 per cent; the 95 per cent case is reported separately as the upper-bound sensitivity). The aggregate ranking of the three policy options remains stable across the sensitivity dimensions tested, with the aggregate impact estimate of Policy Option 3 remaining substantially larger than that of Policy Option 2 and several times larger than that of Policy Option 1 across the sensitivity range tested.

On the volume dimension, the aggregate administrative saving scales linearly with the number of procedures. A prudential lower-bound reading, limiting the count to the share of demand currently activated under the baseline — in the order of 35,000 procedures — places the aggregate administrative saving at approximately 56 per cent of the central value (for example, approximately EUR 11.5 million rather than EUR 20.5 million under Policy Option 3), without altering the comparative ranking of the options. An upward variation from 62,500 to 85,000 procedures per year increases the aggregate saving by approximately 36 per cent; a downward variation to 50,000 reduces it by approximately 20 per cent.

On the processing time dimension, the welfare gain Level 3 is the most sensitive component. An upward variation of the processing time actual baseline from 14.2 months to 18 months increases the welfare gain by approximately 27 per cent under Policy Options 2 and 3, while a downward variation to 9 months reduces it by approximately 36 per cent. The sensitivity is concentrated on the absolute level of the welfare gain, with the relative ranking of the three policy options remaining stable across the sensitivity dimension. The three-dimensional sensitivity confirms the robustness of the comparative ranking and supports the interpretation of the central scenario estimates as informed and calibrated reference values for the comparative assessment of the policy options.

Two interpretive remarks frame the reading of the sensitivity results. First, the comparative ranking of the three policy options remains stable across the sensitivity dimensions tested: Policy Option 3 generates a substantially larger aggregate impact than Policy Option 2, which in turn generates a substantially larger aggregate impact than Policy Option 1, and this ranking holds whether the variation is applied to the realisation factor, the volume baseline or the processing time actual baseline. Second, the absolute levels of the welfare and broader economic effects — reported throughout this section as orders of magnitude rather than as approximations — are sensitive to the wage proxy, the inactivity rate, the sectoral share and the realisation factor. They should be interpreted accordingly as calibrated indicative magnitudes derived from the triangulated primary and secondary evidence assembled for this study. The methodological asymmetry between the observable administrative dimension and the scenario-based welfare dimension is common in regulatory impact assessment and is reflected in the differentiated linguistic register adopted across the section.

Box 1 - Illustrative demand-side scenario for healthcare professions

The cost-benefit analysis presented in this assessment is built on the actual baseline of recognition procedures. To complement it, this section develops an illustrative demand-side scenario showing what recognition pathways would imply in the context of the projected workforce pressures in healthcare — a sector where third-country professionals already play a significant role and where shortages are widely documented. The scenario is intended to illustrate scale rather than to forecast actual mobilisation outcomes.

The Joint Research Centre (JRC, 2024) projects that, under a constant disease-burden scenario, the number of doctors in the EU would need to grow by approximately 30 per cent and the number of nurses by approximately 33 per cent between 2021 and 2071 to meet the demand of an ageing population, while on current supply dynamics the respective stocks would grow by only approximately 16 and 8 per cent.

Applying this demand-supply differential to the 2021 workforce stock of approximately 1.8 million practising doctors and 3.7 million professional nurses yields an illustrative workforce shortfall, derived from the JRC demand-supply differential, of the order of 250,000 doctors and 925,000 nurses over the projection period. These figures are not published shortage estimates: they are an elaboration of the demand-supply differential reported by the JRC, presented solely to convey the scale of the pressures against which recognition pathways operate.

Against this background, the two boxes below illustrate, for three indicative volumes of recognition procedures, the average processing time and the administrative burden associated with carrying out those procedures under the current system and under Policy Options 2 and 3. The volumes — 10,000, 50,000 and 100,000 recognitions — are illustrative reference points, not estimates of the number of professionals that recognition reform would mobilise; their relationship to the projected shortfall is reported only to convey scale.

A) Illustrative demand-side scenario: doctors

For the central illustrative volume of 50,000 recognitions, the average processing time per procedure would fall from approximately 14.2 months under the current system to approximately 5 months under Policy Option 2 and approximately 4 months under Policy Option 3 — a reduction in the individual recognition journey of approximately 9 to 10 months per professional, potentially enabling qualified doctors to enter the workforce sooner. The administrative burden associated with carrying out this volume of procedures would be of the order of EUR 75 million under the current system, falling to approximately EUR 65 million under Policy Option 2 and approximately EUR 50 million under Policy Option 3. The lower and upper illustrative volumes (10,000 and 100,000) scale proportionally, the administrative burden ranging from approximately EUR 15 million to EUR 150 million under the current system, with corresponding reductions under Policy Options 2 and 3.

Set against the projected workforce shortfall for doctors derived from the JRC differential — of the order of 250,000 over the projection period — these illustrative volumes correspond to approximately 4 per cent, 20 per cent and 40 per cent of the derived shortfall respectively, an indication of the scale of the workforce pressures against which recognition pathways operate.

B) Illustrative demand-side scenario: nurses

For the central illustrative volume of 50,000 recognitions, the average processing time and the administrative burden are the same as in the doctors' scenario, since they derive from the same per-procedure parameters: a reduction in processing time from approximately 14.2 months to approximately 5 months under Policy Option 2 and approximately 4 months under Policy Option 3, and an administrative burden of the order of EUR 75 million under the current system, falling to approximately EUR 65 million under Policy Option 2 and approximately EUR 50 million under Policy Option 3.

Set against the projected workforce shortfall for nurses derived from the JRC differential — of

the order of 925,000 over the projection period, markedly larger than for doctors — the same illustrative volumes correspond to much smaller shares: approximately 1 per cent (10,000 recognitions), 5 per cent (50,000) and 11 per cent (100,000). The contrast between the two scenarios lies not in the per-procedure figures but in the scale of the projected workforce pressures: the same recognition effort that would address around a fifth of the projected doctor shortfall would address only around a twentieth of the projected nurse shortfall.

These scenarios are illustrative and do not constitute an estimate of the number of healthcare professionals that would be mobilised under Action 3. They are presented solely to illustrate the scale of administrative burdens associated with recognition pathways in the context of projected workforce pressures. The figures are not comparable to the procedure-based cost savings or the welfare estimates presented elsewhere in this assessment and are not added to the aggregate results; the time figures are expressed as reductions in the average duration of the recognition procedure and are not monetised.

Table 11 - Illustrative demand-side scenario for healthcare professions

Indicator	Current system	Policy Option 2	Policy Option 3
Average processing time (months)	~14.2	~5	~4
Administrative burden – 10,000 recognitions (EUR million)	~15	~13	~10
Administrative burden – 50,000 recognitions (EUR million)	~75	~65	~50
Administrative burden – 100,000 recognitions (EUR million)	~150	~130	~100

Note: The processing-time and administrative-burden figures are identical for doctors and nurses, since they derive from the same per-procedure parameters; the two scenarios differ only in their relationship to the respective workforce shortfalls, reported in the text. Processing times are expressed as reductions in the average duration of the recognition procedure and are not monetised. The administrative-burden figures refer to the cost of processing recognition procedures, not to the cost of filling the workforce shortfall. They are not comparable to, and are not added to, the procedure-based cost savings, welfare estimates or aggregate results presented elsewhere in this assessment. The workforce shortfall is derived (authors' elaboration on JRC projections), not a published shortage figure.

Source: authors' elaboration based on Joint Research Centre projections (JRC, 2024) and the per-procedure parameters of the regulated-profession model.

7 How do the options compare?

7.1 Effectiveness

Under the baseline scenario (PO0 – Score: 0), the main problem and drivers outlined in section 3 will largely persist. Compared to baseline scenario, PO 1 (Score: 0) is expected to improve effectiveness only to a limited extent, primarily by facilitating navigation and promoting voluntary convergence (e.g. through guidance, mutual learning, common templates and enhanced information provision); however, outcomes remain contingent on uptake and are unlikely to systematically alter administrative practices across all Member States. PO2 (Score: 2) is expected to deliver more consistent effectiveness gains, as binding procedural guarantees and coordination obligations should reduce divergence, enhance predictability for applicants and employers and mitigate avoidable delays linked to unclear requirements and repeated requests for information. The effectiveness of PO2 is further strengthened where shared support infrastructure (e.g. authenticity support and interoperable comparability information) enables competent authorities to rely on common evidence bases. PO3 (Score: 3) is expected to perform best on effectiveness, as it combines the enforceable procedural baseline of PO2 with the automatic recognition, thereby reducing reliance on repeated case-by-case reassessments and generating more tangible improvements in practice.

7.2 Efficiency

Under the baseline scenario (PO0 – Score: 0), transaction costs are expected to remain high for all stakeholder groups, as comparable verification and assessment steps are frequently duplicated across institutions and, in many instances, across Member States. Applicants continue to incur significant compliance costs (e.g. translations, certifications and multiple submissions) as well as opportunity costs linked to delayed labour market entry; employers face recruitment delays and vacancy costs; and public administrations devote substantial resources to manual checks and the handling of incomplete files. PO1 (Score: 1) is expected to generate limited efficiency gains, mainly through increased transparency and incremental process improvements (e.g. clearer guidance, checklists and improved information), which may reduce misdirected applications and avoidable exchanges but do not remove the structural duplication embedded in separate national and sectoral procedures. PO2 is expected to improve efficiency substantially, as binding rules on timelines, documentation requirements and coordination can reduce duplication, while shared tools (including authenticity checks and interoperable comparability information) can reduce effort per case and support re-use of prior assessment work. PO3 (Score: 3) is expected to yield the strongest efficiency gains in the

medium to long term, as it not only streamlines procedures but also removes layers of repeated assessment for defined cases through facilitated/automatic pathways and wider digitalisation, thereby freeing capacity for complex files and improving system throughput. Nevertheless, PO3 entails the highest set-up and transition costs (including governance arrangements, IT development, data maintenance and change management), implying that net efficiency gains are likely to accrue progressively over time.

7.3 Coherence

The baseline scenario (PO0 – Score: 0) although inherently coherent with the current EU framework on recognition, would preserve inconsistencies and divergencies on recognition and validation practices across Member States would persist. PO1 (Score: XX) is broadly coherent with existing EU initiatives (including transparency and cooperation instruments) and can reinforce broader EU policy objectives on labour market integration by linking recognition improvements to wider objectives on talent attraction and integration; nevertheless, reliance on voluntary implementation limits its capacity to deliver a coherent and comparable framework across the EU. PO2 (Score: xx) strengthens coherence by establishing a common procedural logic through minimum guarantees, coordination requirements and consistent information obligations, thereby aligning the functioning of systems more closely with the overarching objective of reducing fragmentation and facilitating skills utilisation, while maintaining national competence over substantive recognition decisions and profession-specific safeguards. PO3 provides the most coherent framework by combining common procedural standards with more uniform outcomes, reducing the gap between EU-level objectives on mobility and talent and the practical ability of TCNs to access regulated practice and appropriate employment. As the level of ambition increases, coherence risks also become more salient; in particular, PO3 requires clear scoping, robust governance and safeguards, and careful alignment with sectoral regulation and national licensing requirements in order to avoid the creation of parallel pathways or unintended inconsistencies.

7.4 Proportionality

In line with the EU principle of proportionality, policy intervention should **not exceed what is necessary to achieve the objectives pursued**, and the content and form of the action should be **limited to what is required to address the identified problems effectively**.

The proportionality of the different policy options has been also assessed qualitatively, taking into account the balance between the expected benefits and the implementation efforts required from the Commission, Member States, and other stakeholders. This assessment considers, in particular, whether the scope,

intensity, and implementation requirements of each option are commensurate with its anticipated impacts.

The **baseline scenario** is proportionate in a formal sense, as it involves no additional EU action and therefore imposes no new obligations on Member States or stakeholders. However, while it fully respects national autonomy, it does not respond to the persistent and well-documented shortcomings identified in the problem analysis. Its proportionality lies in its non-interventionist nature, but this also limits its capacity to deliver policy improvement.

PO1 does not impose obligations and respect subsidiarity while still delivering some improvements; the corresponding trade-off is the risk of limited results where structural bottlenecks would persist and voluntary uptake remains uneven.

PO2 remains proportionate insofar as it focuses predominantly on procedural aspects (e.g. timelines, documentation limits, transparency and coordination) rather than harmonising substantive standards or centralising final decisions; moreover, as a minimum-harmonisation measure it leaves Member States free to retain more favourable national regimes.

PO3 is likewise proportionate, although it reflects a different policy choice. **It addresses the identified issues in a more comprehensive and systematic manner**, with the aim of achieving stronger and more durable outcomes. The higher level of implementation effort associated with this option follows directly from its broader ambition, not from any excessiveness of the measures themselves. In this sense, increased effort should not be equated with reduced proportionality: rather, **the measures remain appropriate and necessary given the scale and persistence of the challenges they seek to address**.

7.5 Ranking and comparison of the impacts of POs

To compare the options as a whole, bringing together quantitative and qualitative evidence in a structured way, a Multi-Criteria Decision Analysis (MCDA) has been applied, in line with the European Commission's Better Regulation Guidelines (Tool #62). The MCA combines a set of criteria, weights and scores to produce a comparative ranking of the policy options against the baseline, drawing on the quantitative evidence developed in the previous sections and on the qualitative analysis presented here and in Annex 14. The MCDA has been carried out in three steps, outlined in the following sub-sections.

Box 2 - Transparency in Multi-Criteria Decision-Analyses (MCDA)

The MCDA is a qualitative tool, and thus always subject to scrutiny concerning the implicit and explicit judgments made during the assessment process. Therefore, it is crucial for the application of the MCA to be transparent about the data used and the sources, as well as how specific data has fed into and shaped the analysis.

Source: authors

The following table translates the sub-criterion ratings into aggregate values for the MCA assessment grid. It shows: the direction of effects (positive or negative); the weight allocated to each criterion (equal weighting across all dimensions, consistent with BRT Tool #62 in the absence of a strong evidentiary basis for differential weighting); and the average numeric rating for each policy option. Averages for the evaluation-of-effects criteria are computed as arithmetic means across all relevant specific objectives. Ratings for the types-of-impacts criteria are taken directly from Annex 16.

Table 12 – Overview of overall option rating against the baseline

Criteria	Rating		
	PO1	**PO2**	**PO3**
Effectiveness	1.0	2.0	3.0
Efficiency	1.0	2.0	3.0
Coherence	1.0	2.0	3.0
Overall score	**3**	**6**	**9**

Source: Authors' own elaboration.

8 Monitoring and Evaluation Framework

As part of this study, a monitoring framework has been developed, with a view to tracking the implementation of preferred policy option throughout its life cycle. The aim of the framework is to evaluate the degree to which the preferred policy options achieved the expected impacts and therefore contributed to the achievement of the three specific objectives. To this end, framework will track the development of identified problems and related drivers before and after the adoption of the preferred options, and also direct and indirect impacts of the policy intervention. In addition, it would enhance transparency and accountability and help explain future progress towards the policy goals, as well as informing further debate and evidence-based policymaking. For the purpose of this study, both quantitative and qualitative indicators, depending on the type of outcome being monitored and the availability of data (qualitative indicators or mixed quantitative/qualitative indicators are indicated in italics in the Table) have been identified. For each indicator, potential sources for the data collection necessary are reported in parentheses. To the extent possible, all indicators should be RACER (i.e. relevant, accepted, credible, easy to monitor, robust).

Table 13 - Monitoring and evaluation framework

Specific objectives	Operational objectives	Indicators	Sources of data
SO1: Streamlining recognition and validation processes between and within Member States	• Introduce common procedural rules for the assessment of qualifications and skills (A1, A4). • Improve coordination of national systems and reduce overlap between recognition and labour migration procedures (A2). • Increase convergence of national approaches and, where relevant, facilitate automatic recognition of selected qualifications (A11).	• Average time taken to acknowledge and decide on applications. • Share of procedures complying with common deadlines and procedural guarantees. • Number of Member States having established coordination mechanisms between recognition and migration authorities. • Number and share of recognition decisions or qualifications covered by streamlined or automatic recognition arrangements.	• Member States' administrative data and national competent authorities. • Transposition and implementation reports. • Targeted evaluation study and stakeholder surveys.

Specific objectives	Operational objectives	Indicators	Sources of data
SO2: Reduce legal and administrative complexity for recognition and validation of qualifications and skills of third-country nationals	• Ensure that applicants receive complete and comparable information on procedures, requirements, timelines, fees and appeal rights (A3). • Limit documentation burdens and facilitate the acceptance of documents in more than one language (A5, A6). • Reduce excessive applicant costs through common rules on fees (A7).	• Share of Member States providing the mandatory information set in accessible formats. • Average number of documents required per application and share of cases exceeding the common maximum. • Share of applications accepted with documents submitted in additional languages. • Average fees charged to applicants and estimated administrative cost savings for applicants and authorities.	• Member States' websites and national guidance portals. • Administrative data from competent authorities. • Applicant surveys, business surveys and external evaluation studies.
SO3: Increase trust and understanding of qualifications and skills obtained in third countries	• Increase the authenticity and reliability of evidence submitted in support of recognition through verifiable digital credentials (A8). • Improve transparency and information-sharing on comparability and past recognition decisions through interoperable national databases (A9). • Strengthen confidence in selected third-country qualifications through prior verification against EU standards and automatic recognition mechanisms (A11).	• Number and share of applications supported by verifiable digital credentials. • Number of Member States operating interoperable comparability databases and number of cross-border consultations carried out. • Recognition rate for qualifications covered by comparability tools or automatic recognition mechanisms. • Perceived level of trust among competent authorities, employers and education providers in qualifications obtained in third countries.	• Administrative data from competent authorities and ENIC-NARIC-type networks, where relevant. • Stakeholder consultations and dedicated evaluation studies.

Source: Authors' own elaboration

Annexes

Annex 1. Procedural information

1. **Identification of the lead Directorate-Generale (DG):** DG for Employment, Social Affairs and Inclusion (DG EMPL).

2. **Start and end of the contract:** the contract for the study supporting an Impact Assessment of Directive 2005/36/EC started in October 2025 for a duration of fifteen months. The final report supporting the impact assessment of Directive 2005/36/EC, focusing on SPI-related aspects, was submitted by the Contractor for review of the Regulatory Scrutiny Board in May 2026.

3. **Inter-service Steering Group:** the Inter-service Steering Group (ISG) was set up by the Secretariat-General to assist in the preparation of the initiative as part of the wider package on the Skills Portability Initiative. The representatives of the following Directorates-General participated in the ISG work: EAC, ECFIN, GROW, HOME, REGIO, RTD, SANTE, TRADE, SG and the Legal Service

4. **Evidence used in the impact assessment:** The impact assessment relies on multiple sources of qualitative and quantitative evidence, both primary and secondary. A list of relevant secondary sources consulted is provided in Annex 11 of the current report. In addition, several consultation activities have been undertaken by the contractor to gather additional primary data. The results of the consultation activities are summarised in the Synopsis Report, presented in Annex 2 of the current document.

Annex 2. Synopsis report

Annex 2.1 Consultation strategy

Tool/Method	Objectives	Stakeholders (number and type)	Start – end date
Strategic interviews	• Refine the scope of the study • Gather relevant sources and stakeholders to consult	• EU Commission (DG EMPL (1), DG HOME (1), DG SANTE (1) • ETF • ICMPD • Migration expert	02.12.25- 18.12.25-
Targeted interviews	• Identify existing challenges for different stakeholders • Gather insights regarding the existing coordination sharing mechanisms and accessibility of recognition pathways to TCNs	• **CAs in selected third countries (15)**: Armenia, Bosnia Herzegovina, Bangladesh, Georgia, India, Israel, Jordan, New Zealand, North Macedonia, Pakistan, Palestine, Serbia, Tunisia, Türkiye, Ukraine) • **EU Umbrella organisations of employers (4)**: European Hospital and Healthcare Employers' association (HOSPEEM), Business Europe, SME United, European construction industry federation (FIEC) • **HR departments (6)**: Work in Finland Unit, Business Finland, Carinthian International Centre (CIC), Fragomen, working studying and living in Germany, World Employment Confederation (WEC), EY HR department • **IOs (6)**: European Centre for Policy Development and Management (ECPDM), International Organisation for Migration (IOM), ITCLO, OECD, UNHCR, World Health Organisation (WHO) • **CSOs (5)**: Jesuit Refugee Services (JRS), Advisory Council on migration, Solidar Foundation, lifelong learning Platform (LLP), Women Migrant in Malta • **EU professional organisations (5)**: Standing Committee of European Doctors (CPME), European Federation of Nurses (EFN), European Union of General Practitioners (UEMO), International Road Transport Union (IRU), European Council of Engineers Chambers • **Other Stakeholders (3)**: ENIC NARIC centres and PES	20.01.26-21.04.26.

Tool/Method	Objectives	Stakeholders (number and type)	Start – end date
Surveys	• Collect evidence on procedures, length and existing challenges of the procedures for the recognition of qualifications and validation of skills acquired outside the EU	• **CAs of regulated professions across EU Member States (190)**: AT (20), BE (3), DE (12), EE (2), ES (6), FI (4), FR (5), HR (9), HU (3), IE (9) IT (9), LV (5), LT (11), LU (2), MT (15), NL (12), PL (8), PT (13), RO (18), SE (6), SI (7), SK (1) • **National migration authorities (48)**: AT (1), BE (5), BG (1), CZ (1), FR (1), HU (3), IE (1), IT (1), LT (11), MT (1), NL (1), PL (16), PT (3), SE (1), SK (1) • **ENIC NARIC Centres (18)**: BE, BG, EE, FI, FR, EL, ES, HU, IE, IT, LT, LV, NO, NL, RO, SE, SI, SK • **TCNs and EU citizens with TCQs 63)**	26.01.2026-30.04.2026
Focus Groups on the impacts of proposed POs	• Assessing the potential impacts (costs and benefits) of proposed POs on different strategic sectors and occupations, including both unregulated and regulated professions.	• **National CAs of regulated professions of electricians and crane operators (20):** EE, ES, FI, HR, IT, LT, LU, MT, NL, SE • **National CAs and EU professional organisations in the healthcare sector (31):** AT, DE, EE, ES, FI, IE, LT, LU, MT, NL, PL, SE • **National Labour migration authorities and relevant IOs (28**): BE, CZ, ES, FI, FR, HU, IE, LT, MT, NL, PL, SI • **ENIC NARIC Centres, PES and CSOs (37)**: BE, BG, DE, EL, ES, FI, FR, IE, IT, LI, LU, LV, NL, NO, PT, RO, SE, SI • **HR departments and Talent Partnerships stakeholders** (27): AT, BE, DE, DK, ES, IT, NL, RO, SE	16.02.26-18.03.26
SPI PC	• Gather views from individuals and organisations on recognition of qualifications and validation of skills acquired outside the EU. • Identify challenges faced by individuals and employers when recognising qualifications and validating skills • Collect evidence on experiences with recognition procedures and skills validation.	• EU citizens with TCQs (37) • TCNs (61) • Public Authority (81) • Academic/research institution (44) • Non-Governmental Organisation (NGO) (43) • Business Association (41) • Company/Business (29) • Trade Union (11) • Other stakeholders (56)	05.12.26-27.02.26

Annex 2.2 Results

Annex 2.2.1 Strategic interviews

During the Inception phase of the study, **six scoping interviews** were conducted to **refine the scope of the study** and **gather additional evidence on key issues** affecting recognition procedures for TCNs holding non-EU qualifications, **and potential adjustments** suggested by stakeholders. An overview of the key findings is provided below:

- There is a **broad consensus among stakeholders that difficulties in the recognition of qualifications and validation of skills of TCNs represent a major structural barrier to their effective labour market integration and to addressing persistent labour shortages across the EU**. Refugees and beneficiaries of international protection, as well as some family migrants, are identified as facing the greatest obstacles by almost all interviewees (four out of five).
- **Recognition systems are widely described as fragmented, slow, costly and difficult to navigate, with significant variation across Member States and limited transparency for migrants and employers**. There is strong agreement that **EU level action could add value** by fostering trust, pooling recognition knowledge and decisions, improving information availability, and promoting common principles or minimum standards, while respecting national competences.
- Interviewed stakeholders consistently expressed **caution towards binding EU legislation, citing the political sensitivity of migration and the subsidiarity of education and training**. There is **broad support instead for softer EU instruments** (e.g. guidelines, common principles, interoperability and transparency tools, pooled or sample based assessments, and structured information exchange frameworks) which are regarded as **more feasible and acceptable to Member States** at this stage, while still offering clear potential to reduce fragmentation, improve efficiency and strengthen trust across recognition systems.

Annex 2.2.2 Targeted interviews

During the course of the study, 44 targeted interviews were conducted **to explore legal and policy barriers and administrative challenges faced by TCNs**, as well as **coordination and information sharing across EU and Member States**, and **structural labour market issues**.

- There is a wide consensus among interviewees that **complex, lengthy and fragmented recognition procedures discourage TCNs from pursuing employment in the EU** and reduce employers' willingness to recruit them, contributing to skills underutilisation and recruitment bottlenecks.
- Interviews confirm that **recognition systems operate largely in national silos**, with **limited coordination across Member States**, leading to diverging procedures, duplicated checks and inconsistent outcomes for similar qualifications. Overall, neither TCNs nor employers can easily obtain clear, comparable and authoritative information

on recognition requirements across Member States, particularly for regulated professions and decentralised systems.

- There is a wide consensus that persistent **labour shortages**, particularly in regulated and shortage-prone sectors such as healthcare, **coexist with long-term underutilisation of TCN skills**, as rigid recognition procedures delay or prevent labour-market entry, disproportionately burden SMEs with limited administrative capacity, and channel TCNs into lower-skilled or non-regulated jobs.
- The **limited coordination between migration rules and recognition requirements** leads to repeated checks, delays and inability to complete recognition due to residence or visa constraints. Moreover, the **lack of familiarity with third country curricula, training standards and institutions** contributes to distrust and conservative, document heavy assessments.
- This is exacerbated by **the fact that dispersed competences across authorities result in parallel procedures, repeated checks and incoherent decision making**, reducing predictability for applicants and employers.
- **Overall, employers**, especially SMEs, **lack the tools and knowledge to interpret TCQs and skill profiles**, leading to conservative recruitment or exclusion of TCN candidates. In particular, validation of non-formal and informal skills remains largely employer driven and inconsistently applied, with limited standardisation or public frameworks, thereby disadvantaging TCNs.
- There is a strong consensus among interviewees that **additional documentation requests are often difficult or impossible to meet**, especially for refugees and asylum seekers, **exacerbating delays and exclusion from recognition pathways**.

Lastly, building on interviews with third-country authorities across **15 countries (**Armenia, Bosnia Herzegovina, Bangladesh, Georgia, India, Israel, Jordan, New Zealand, North Macedonia, Pakistan, Palestine, Serbia, Tunisia, Turkiye, Ukraine)**,** the findings indicate that an **all consulted stakeholders** consider **EU-level action necessary to harmonise rules for the recognition of qualifications**. This support is primarily driven by the need to reduce fragmentation, improve transparency, and simplify complex and heterogeneous national procedures, which are widely seen as a key barrier to labour market integration and mobility for TCNs. Authorities from 12 third countries emphasise that common EU rules would **streamline procedures, clarify pathways, enhance information exchange, and reduce administrative burdens**, including through digital tools and more coherent frameworks. Some neighbouring countries broadly confirm the **structural convergence of rules already exists**, notably through the Lisbon Recognition Convention, national legislation, and alignment with frameworks such as ECTS and ENQA, but highlights that recognition remains **nationally implemented with divergent verification practices**, particularly regarding authenticity checks and institutional responsibilities. While **nine authorities from third countries see potential in expanding automatic recognition**, especially where qualification frameworks are already aligned or partial automatic recognition mechanisms exist, two third-country authorities adopt a **cautious stance**, as they stress that automatic recognition does not fundamentally remove the need for verification. Two third-country authorities further argue that **the main issue lies not in the absence of rules but in uneven implementation, capacity constraints, and insufficient use of existing frameworks**, pointing to the need to strengthen application of existing instruments and shift towards

competence-based approaches rather than relying solely on formal qualification recognition.

Annex 2.2.3 PC of the SPI initiative

The **PC** supporting the IA of the SPI collected extensive stakeholder feedback on the recognition of qualifications and the validation of skills acquired outside the EU. Conducted between December 2025 and February 2026 and complemented by a Call for Evidence, the consultation yielded **785 responses**, of which **486 were retained for analysis** relevant to Action 3. These responses reflect the views and experiences of **TCNs**, **EU citizens with TCQs**, **employers, public authorities**, **CSOs**, **social partners**, **academic stakeholders** and **other relevant actors** involved in recognition, recruitment and labour market integration.

Among **TCNs**, **27.9% reported having already applied for recognition of their qualifications**, while a large **majority (63.9%) stated that they plan to apply**. Only 3.3% of TCN respondents indicated that they neither had applied nor intended to apply. Among EU citizens with TCQs, 36.8% had already completed recognition and 36.8% planned to apply, while 23.7% reported no intention to seek recognition.

The main motivations for seeking recognition were consistent across respondent groups. 70.2% of respondents indicated that recognition was pursued to **improve access to employment matching their qualification level**, while 53.6% **sought recognition to support career progression and improve pay or working conditions**. Among TCNs specifically, 39.3% also reported that recognition was linked to **visa, residence or work-permit requirements**, confirming the interplay between recognition and migration frameworks.

With regard to **duration**, recognition procedures were reported to be relatively short for a majority of respondents, but not uniformly so. 61.3% of individuals who had completed recognition procedures reported total durations of **up to six months**, while 22.6% reported procedures lasting **between six months and three years**. No meaningful differences were observed between TCNs and EU citizens with TCQs in this respect.

Reported **costs** varied widely. 35.5% of respondents indicated total recognition costs between **EUR 1 and EUR 250**, while 12.9% reported costs between **EUR 501 and EUR 1,000**, including application fees, certified translations and document legalisation. These findings point to substantial cost variability depending on Member State and individual circumstances.

Respondents frequently associated recognition processes or outcomes with **negative labour market effects**. Among those who had completed recognition procedures, 32.3% **reported missing a job opportunity**, 19.4% **indicated having to accept employment below their qualification level or expected pay**, and 13% **reported delays in starting employment**. A smaller share reported changing occupational field or leaving the EU due to recognition-related challenges. Only 5.9% of **respondents** reported exclusively positive outcomes.

In contrast to qualification recognition, **formal validation of skills** remains limited. Only 6.6% of **TCNs** and 5.3% of **EU citizens with TCQs** reported having completed a skills validation procedure. However, interest in validation is high: **65.6% of TCNs** and **44.7% of EU citizens with TCQs** stated that they plan to pursue validation in the future.

Among respondents who did not intend to validate their skills, **65.7% identified lack of awareness as the main barrier**. In particular, respondents reported that they had either **never heard of skills validation procedures** or **did not know how to proceed or which authority was responsible**. This finding suggests that low uptake is driven primarily by information gaps rather than low perceived relevance.

Where skills validation had taken place, reported durations ranged from **less than one month to six months**, and costs were generally low, with several respondents indicating that validation was **free of charge**. Despite the limited number of observations, respondents reported impacts similar to those observed for qualification recognition, including missed job opportunities, delayed employment and discouragement from pursuing opportunities in other Member States.

Employers engaged in the hiring of TCNs responding to the consultation reported **heterogeneous assessment practices** when recruiting TCNs. 75% of **employers** (n=15) indicated that they request **formal proof of qualifications**, while 60% (n=13) rely on credentials issued by an official authority. At the same time, 45% (n=9) reported using structured interviews, and 40% (n=8) relied on **competency-based tests**, **practical demonstrations** or **assessment**s.

Only **15% of employers (n=3)** reported requiring **formal validation of skills by a CA**, while a larger share relied on employer-led assessments or applicants' self-declared competences. Trust in micro-credentials remains limited, with **15% of employers accepting them as such**, although acceptance rises to **35%** where learning outcomes, training providers and QA arrangements are clearly identifiable.

Formal recognition of qualifications was frequently reported as a response to **external requirements**, rather than employer preference. **50% of employers** indicated that recognition was required due to compliance obligations (e.g. public tenders or subsidised contracts), while **25% used recognition primarily to verify authenticity**. At the same time, **20% reported using recognition outcomes to better understand qualification content**, and **15% to support wage-setting decisions**.

PC responses clearly highlight the **interaction between recognition procedures and migration frameworks** for TCNs. Respondents consistently reported that delays or uncertainty in recognition processes directly affect access to employment, residence security and mobility. Employers and stakeholders provided examples of qualified TCNs being legally present in a Member State but unable to work—or unable to work at their skill level—while awaiting recognition decisions required for permit issuance or renewal.

Across all respondent groups, the challenges most frequently identified include:

- **Fragmented and non-uniform recognition procedures** across Member States (67.9%);
- **Limited understanding of TCQs by employers** (62.4%);
- **Lack of trust in qualifications obtained outside the EU** (43.8%);
- **Limited understanding of skills acquired outside the EU** (41.6%).

Additional issues frequently cited in open-ended responses included **lack of clear information, complex procedures, extensive documentation requirements and doubts about third-country QA systems.**

Support for EU-level action is very strong. 75.7% of respondents considered EU-level **action to simplify recognition and validation procedures** very necessary, while 19.8% considered it somewhat necessary. In parallel, more than 70% considered **attracting skilled non-EU nationals important or very important** for their sector or country.

Annex 2.2.4 Surveys

Problems

Survey evidence collected from **CAs (n = 190), migration authorities (n = 48), ENIC-NARIC centres (n = 18), and TCNs (n=253)** shows that **significant problems have emerged in the recognition of TCQs**, notably in terms of **procedural duration**, **administrative burden**, **cost exposure** and **TCQs**. These problems are consistently observed across authority types and sectors and materially affect both applicants and employers.

- First, surveys indicate that **recognition procedures are lengthy and outcomes difficult to predict.** According to the survey targeted at CAs, (Q16; n = 134), recognition decisions are rarely delivered within one month, while 40% of authorities report average timelines of 1–3 months and 36% of 3–6 months from complete application to decision. The survey targeted at TCNs also highlighted that the duration of recognition processes is long (Q13, n=160), lasting between 1 and 3 months according to 18,8% of respondents, but with a 36,3% indicating the length of recognition processes of over one-year Delays are particularly pronounced in regulated professions. Migration authorities further report limited visibility on timelines, with 50% (n = 48) indicating that the additional processing time linked to qualification or skills checks within migration procedures is unknown. Nonetheless, 64.2% of CAs consulted (Q20, n=190) highlighted the existence of pre-arrival assessment, meaning the possibility for TCNs to apply to recognition prior to having obtained visa, residence or work permit.
- Second, surveys highlight **heavy documentary and administrative requirements**. Evidence from the survey targeted at CAs, (Q10 and Q11; n = 134) shows that all responding authorities require more than six documents, often to be submitted in original paper form. Certified translations are widely required either systematically or in specific cases, as confirmed by the CA survey. Migration authorities report limited procedural flexibility, with 64.6% (n = 48) stating that applications cannot proceed when

documentation is missing or incomplete, compared to 29.2% allowing progression on the basis of partial documentation.

- Third, survey results show that **costs associated with recognition have emerged as a significant barrier**. According to the survey targeted at CAs, (Q17; n = 190), applicants face multiple cost components, with application fees ranging from no fees to over €2,000, depending on the Member State and profession. Medical doctors and dentists consistently face the highest costs, frequently exceeding €1,000. The survey targeted at TCNs (Q18, n=152) confirms the existence of a substantial financial burden, with a 21.7% of respondents highlighting costs greater than €2500. While 95.8% of migration authorities (n = 48) report no fees for qualification checks within migration procedures, costs are often incurred at later stages through recognition bodies or professional regulators.
- Finally, surveys reveal **persistent trust deficits towards TCQs**. The survey targeted at CAs, (Q28; n = 134) shows that 57.1% of authorities identify verification of authenticity as a main challenge, while 60.5% report only moderate (51.1%) or low (8.8%) trust in third-country qualification evidence (CA survey, Q15). These findings are corroborated by the ENIC-NARIC survey, (Q26; n = 18), where almost 90% of respondents report significant difficulties in recognising third-country qualifications.

The necessity of EU Action

Survey respondents from the ENIC-NARIC centres largely agree that EU action is necessary to **increase cooperation between EU Member States and third countries** (83.3% of ENIC NARIC Centres (Q.33, n=18) considering EU action necessary to a large (50%) or moderate (33,3%) extent) **and EU-level coordination towards improving information provision and targeted support to TCNs** ((72.2%) to a large (33,3%) or moderate extent (38,9%)). Support for a **common recognition framework** and **for equal treatment between EU citizens and TCNs holding TCQs** is positive overall (55% and 61% respectively), though more evenly distributed. In particular, 22.2% of ENIC-NARIC centres support **equal treatment** to a large extent and 38.9% to a moderate extent, while 27.8% support an **EU common framework to streamline recognition procedures** to a large extent, followed by a further 27.8% to a moderate extent. TCNs also highlighted the need to streamline procedures (Q8, n=252) as the majority of TCNs considers the **lack of uniform and simple way to get their qualifications recognised** as a big (30,8%) or very big (37,9%) problem and **their length, cost and complexity** as a big (27,3%) and a very big (43.1%) problem.

POs

Survey evidence provides a quantitative basis for the three retained POs.

- **PO1 – Building on existing mechanisms to improve recognition and validation**: Responses from CAs indicate a moderate but broad-based expectation that **EU-level action could improve daily recognition activities**. Around 47% of CAs consider that EU intervention would **improve the efficiency of daily tasks to a large or moderate extent,** while 48% expect it to enhance simplification and harmonisation of procedures

(Q39, n=190). Additionally, 70.4% TCNs responding to the survey highlighted the need to simplify procedures and reduce timelines and costs (Q8, n=252). Similarly, 53% of CAs believe that **EU action would improve trust in TCQs** to a large or moderate extent, and 51% consider it would contribute to more predictable recognition outcomes. When asked about specific measures, CAs most frequently identified **tools to verify document authenticity and prevent fraud** (74.7%), followed by **clearer and more consistent assessment criteria across Member States** (49.5%) and **strengthened administrative cooperation between CAs** (44.7%). Guidance and best practices to streamline procedures were selected by 38.4%, while enhanced cooperation with third countries was supported by 38.9%. These results indicate strong support for non-legislative, capacity-building and coordination measures underpinning PO1.

- **PO2 – Common rules to streamline procedures**: Survey results also show substantial support for more **formal procedural alignment**. Among CAs, 27.9% consider that EU intervention would **enhance simplification and harmonisation of procedures** to a large extent, and a further 25.3% to a moderate extent. Predictable outcomes were similarly valued, with 51% of CAs reporting that EU action could improve predictability to a large or moderate extent (Q39, n=190). Similarly, TCNs confirm the need for streamlining procedures (68.7% - Q8, n=252) and enhance predictability (27.9% -Q19, n=253). Support for **procedural streamlining is further confirmed by the selection of common rules on deadlines, documentation, appeals and compensation measures**, identified by 25.3% (Q35, n=190) of CAs as among the most helpful measures. The emphasis on **clearer assessment criteria** across Member States and additional staff or resources for recognition authorities (32.1%) also points to structural constraints that PO2 seeks to address through binding common procedural guarantees.
- **PO3 – Common rules including automatic recognition for selected professions:** Expectations of EU intervention are strongest where systemic trust is concerned. Among ENIC-NARIC centres, 44.4% consider that EU-level action would improve **trust in qualifications and skills acquired in third countries** to a large extent, while a further 16.7% consider it would do so to a moderate extent (Q.35, n=18). Similarly, 61.1% of ENIC-NARIC respondents expect EU action to enhance **simplification and harmonisation of procedures** to a large or moderate extent, and 55.5% expect it to contribute to more predictable outcomes. Migration authorities echo these priorities. The most frequently selected measure to improve qualification and skills checks in labour migration procedures is the use of **trusted lists or tools to verify qualifications** (58.3%, Q25, n=48), followed by **standardised document requirements** (37.5%) and **better coordination between migration and recognition authorities** (29.2%). Support is also expressed for staff training, digital submission and tracking, and pre-arrival checks. Together, these results point to support for system-level trust mechanisms and more automated or standardised approaches in high-volume or high-risk contexts, which underpin PO3.

Annex 2.2.5 Focus groups

A series of focus groups were conducted to complement survey evidence and provide in-depth qualitative insights into the functioning of qualification recognition and skills validation systems for TCNs. In total, seven strands of focus groups were carried out, involving **CAs in the healthcare sector**, **CAs responsible for crane operators and electricians**, **ENIC-NARIC centres and PES**, **QA bodies** involved in discussions on automatic recognition, **labour migration authorities and international organisations**,

and **TCNs**. Together, these focus groups covered a broad range of professions, institutional roles and Member States, enabling a detailed exploration of operational practices, constraints and governance issues that are not fully captured through quantitative evidence.

Across all focus groups, participants consistently emphasised that **procedures for recognition and skills validation are highly fragmented**, both between Member States and within national systems.

Focus groups with CAs in the healthcare sector and in the regulated professions of electricians and crane operators confirmed that **recognition procedures for comparable qualifications vary substantially across Member States**, particularly in terms of **documentation requirements**, **assessment criteria** and the **use of compensation measures**. Authorities stressed that these differences are largely driven by national legal frameworks and governance traditions, leaving limited scope for convergence even where professional profiles and training content are similar. In particularly, in the focus group with CAs responsible for crane operators and electricians, participants described markedly **different recognition logics across Member States**. In these professions, access often depends primarily on occupational licences, verified work experience or safety certifications rather than academic qualifications, resulting in procedures that differ not only across borders but also sharply from those applied to academic professions.

Focus groups with ENIC-NARIC centres and PES highlighted fragmentation within Member States, where **multiple actors are involved in recognition-related processes without clear sequencing or coordination**. Participants reported overlapping responsibilities between sectoral regulators, education authorities, ENIC-NARIC centres, migration authorities and PES, often leading to parallel procedures and duplication of checks. PES participants underlined that such fragmentation complicates labour-market integration, as recognition outcomes are difficult to anticipate and are not systematically aligned with employment support services.

The focus group on labour migration with migration authorities and IOs further confirmed that **recognition and migration procedures often operate in institutional silos**. Participants noted that qualification checks embedded in migration pathways are not consistently aligned with recognition processes carried out by education or professional authorities, contributing to inconsistent outcomes and uncertainty for both applicants and employers.

Across focus groups, including those with ENIC-NARIC centres, PES, HR departments and migration authorities, participants also stressed the **lack of clear and accessible information for TCNs and employer**s. Information on recognition procedures was described as fragmented, highly technical and dispersed across multiple institutional channels, with particular difficulties in decentralised systems where responsibilities vary across regions.

Focus group discussions provided rich qualitative evidence on **the complexity and burden of recognition procedures**, notably regarding **timelines**, **documentation** and **costs**.

In the focus group with healthcare CAs, participants consistently described recognition procedures as lengthy and characterised by uncertain timelines, largely due to detailed curriculum comparisons, public interest safeguards and the imposition of compensation measures. Authorities explained that processing times are difficult to shorten without compromising regulatory obligations, and that misalignment with migration timelines further exacerbates delays.

Participants in the focus group with migration authorities and IOs confirmed that TCNs often face **difficulties navigating prolonged and poorly synchronised procedures**, particularly where recognition cannot be initiated or completed from abroad. These delays were highlighted as a practical barrier to labour-market access, even where labour shortages are acute.

Burdensome documentation and translation requirements emerged as a major bottleneck across focus groups. CAs, ENIC-NARIC centres and PES all reported that recognition procedures typically require extensive original documentation and certified translations. The focus group with TCNs provided direct user perspectives on these challenges, with participants describing difficulties in retrieving documents from countries of origin, particularly in contexts of conflict, displacement or weak administrative systems. TCNs reported that missing or incomplete documentation often prevents applications from progressing, regardless of their actual skills or experience. In addition, Talent Partnerships stakeholders highlight several **key challenges related to recognition**, described as a **"central unresolved issue"**, which often leads employers to bypass formal recognition and rely on their own skills assessments. They report persistent administrative burdens, complex procedures, and difficulties in aligning training systems with EU labour market requirements. They also underline the need for stronger governance, better coordination across institutions, and continuous updating of training standards to match EU needs.

Cost-related burdens were also raised across focus groups. Healthcare CAs, QA bodies and PES highlighted that applicants frequently face significant direct and indirect costs linked to application fees, translations, examinations, adaptation periods and additional training. Participants stressed that these **costs are often unclear** at the outset of the process. The TCN focus group confirmed that uncertainty around total costs can discourage applicants from pursuing recognition or lead to disengagement during procedures, while PES participants noted that costs can deter employers from supporting recognition processes.

Issues related to trust, information gaps and quality assurance featured prominently across focus groups and were identified as key drivers of restrictive recognition practices.

Focus groups with CAs of regulated professions of electricians and crane operators as well as in the healthcare sector, and ENIC-NARIC centres consistently highlighted concerns over the **authenticity of documents** issued in third countries. Participants described **verification processes as largely manual and resource-intensive**, often relying on direct contact with institutions, ad-hoc curriculum reviews or accumulated institutional knowledge. These challenges were reported to be particularly pronounced for qualifications from countries affected by conflict or with limited administrative cooperation.

Insufficient knowledge of third-country education and training structures, curricula and standards were also repeatedly cited. ENIC-NARIC centres noted that available information is often fragmented or insufficiently operational to support streamlined assessments, reinforcing cautious and case-by-case decision-making. PES participants added that these knowledge gaps contribute to employers' reluctance to rely on foreign qualifications.

The focus groups on automatic recognition with QA bodies provided deeper insight into **structural trust deficits**. QA bodies emphasised that the existence of quality-assurance systems or qualifications frameworks in third countries is not sufficient, in itself, to enable trust or facilitate more automatic forms of recognition. Participants underlined the **lack of comparable, verifiable and practice-oriented information on how QA systems operate in reality**, including supervision and enforcement mechanisms. As a result, assessments remain isolated and repetitive, with limited learning effects across cases or Member States. Concerns about public-interest safeguards, particularly in regulated professions such as healthcare, were repeatedly cited as a rationale for maintaining conservative and resource-intensive approaches.

In terms of solutions supported by stakeholders involved in focus groups, and particularly TCNs, consistent support was embraced regarding the need for simplification of procedures. **In fact,** TCN participants express **strong and consistent support for simplification**, with four participants clearly indicating that faster and clearer procedures would significantly improve their career outcomes, and three identifying complexity and lack of clarity as the main barriers. This is reinforced by multiple participants highlighting fragmentation across Member States and the need to repeat procedures when moving across countries. However, **explicit support for automatic recognition is limited**: only one participant directly called for EU-wide recognition of qualifications, although several implicitly support greater portability and reduced duplication. Overall, TCNs strongly favour the simplification objectives of PO3, while their position on automatic recognition remains indirect and conditioned by a need for flexibility, support, and recognition of diverse individual situations. Evidence from stakeholders directly involved in Talent Partnerships shows **clear support for the underlying logic of PO3**, although not for automatic recognition as a standalone measure. Their contributions emphasise the need for **alignment of training systems in third countries with EU standards (e.g. EQF/ESCO), pre-departure preparation, and stronger cooperation with education and training institutions**, which are seen as essential conditions to enable more predictable and trusted recognition outcomes. Talent partnership participants also emphasised that automatic recognition would be **particularly useful in shortage sectors** (e.g. healthcare, drivers) but should be **accompanied by quality controls** such as adaptation measures, benchmarking of training standards, or verification mechanisms. In this sense, their position is fully consistent with the PO3 approach of **ex ante verification and trust in approved learning programmes**.

Overall, the focus groups demonstrated that the challenges faced by TCNs in recognition and skills validation processes are driven by fragmentation of governance, procedural

complexity and persistent trust deficits, which interact and reinforce one another across Member States and professions. By capturing the perspectives of recognition authorities, migration authorities, QA bodies, PES and TCNs, the focus groups provided a comprehensive qualitative understanding of how these drivers operate in practice and why barriers persist despite existing policy initiatives.

Annex 3. Who is affected and how

This annex identifies the stakeholder groups directly and indirectly affected by the recognition and validation of qualifications and skills of third-country nationals across the European Union, sets out the obligations and practical implications of each policy option for these groups, presents a structured summary of the benefits and costs associated with the preferred option, and identifies the contribution of the initiative to the United Nations Sustainable Development Goals. The analysis builds on the cost and welfare estimates in Section 7.2 and on the methodological framework set out in **Error! Reference source not found.**

Annex 3.1 Practical implications of the initiatives

The practical implications of the three policy options analysed in this report are set out in the table below, structured by stakeholder category. Five groups are directly affected: (1) third-country nationals seeking recognition or validation of their qualifications and skills; (2) competent authorities responsible for recognition of qualifications in regulated professions; (3) ENIC-NARIC centres performing academic assessment of foreign qualifications; (4) migration authorities managing residence permits and labour-market admissions; and (5) employers — including SMEs — recruiting TCNs . The associated cost and benefit implications are presented in Annex 3.1.

Table 14 - Practical implications of the policy options by stakeholder

Action / measure	TCNs	Competent authorities	ENIC-NARIC centres	Migration Authorities	Employers (incl. SMEs)
			Policy Option 1 — Building on existing mechanisms to improve recognition and validation		
Mutual-learning programmes and comparative studies on national recognition and validation practices (B1)	Indirect benefit through gradual convergence of administrative practice across Member States; no direct obligation.	Voluntary participation in EU-funded peer learning; no binding operational obligation; possible adjustment of internal practice where good practice is taken up.	Voluntary participation in mutual-learning activities; no binding change to the academic comparability assessment.	Voluntary participation in EU-funded peer learning where migration authorities interact with recognition systems; no binding operational obligation.	Marginal benefit through gradual reduction in inter-Member State variability of recognition outcomes, supporting predictability of cross-border recruitment of third-country nationals.
EU guidelines and standardised information materials on procedures, documentation and timelines (B6, B9)	Improved access to standardised information on recognition requirements; reduction in pre-application uncertainty.	Voluntary alignment of website content and information materials with EU guidance; no enforcement mechanism.	Voluntary update of guidance materials addressed to applicants and host institutions.	Indirect benefit through clearer information on recognition procedures, supporting alignment between admission decisions and recognition outcomes.	Indicative reduction in employer-borne administrative cost of approximately 5–10 per cent under the soft-coordination scenario, driven by improved access to standardised information on recognition outcomes.
Capacity-building and training of competent-authority staff on third-country qualification systems (B11, B12, B13)	Indirect benefit through more informed CA decisions and potentially shorter verification times.	Voluntary participation in EU-funded training; improvement in handling of complex third-country dossiers; no binding obligation.	Voluntary participation; potential improvement in comparability assessment of third-country qualifications.	Voluntary participation in joint training on third-country qualification systems; potential improvement in qualification checks within admission procedures.	Marginal indirect impact through more reliable recognition outcomes.
Pre-departure orientation and support for skills validation (B14, B15)	Better preparation prior to entry; reduced risk of incomplete applications; lower waiting-period opportunity cost where validation pathways are accessible earlier.	Marginal effect on per-procedure caseload through better-prepared applications.	Marginal effect through better-prepared dossiers received.	Marginal effect through better-prepared dossiers presented at admission, reducing duplication of documentary checks.	Indirect benefit through earlier availability of recognised or validated competences among recently arrived third-country nationals.
			Policy Option 2 — Common rules to streamline procedures		

Action / measure	TCNs	Competent authorities	ENIC-NARIC centres	Migration Authorities	Employers (incl. SMEs)
Common procedural rules for the assessment of skills and qualifications of third-country nationals (A1)	More predictable procedural framework; uniform procedural rights across Member States; reduction in pre-application uncertainty.	Binding obligation to apply common procedural rules; procedural adaptation required where current national practice diverges.	Procedural alignment with the common rules where ENIC-NARIC centres are involved in the assessment; minor operational adaptation.	Procedural alignment where migration authorities perform qualification checks within admission decisions; minor operational adaptation.	More predictable procedural conditions facilitating cross-border recruitment of third-country nationals; reduction in case-by-case complexity. Indicative employer-borne cost reduction of approximately 20–30 per cent under the binding-coordination scenario.
Coordination of national systems for recognition, validation and labour migration to prevent duplication (A2)	Reduction in the duplication of documentation and verification steps across parallel procedures; lower aggregate burden.	Binding obligation to coordinate with migration authorities and skills-validation bodies; partial review of internal workflows required.	Possible coordination obligations with national skills-recognition and migration authorities, depending on Member State configuration.	Binding coordination obligation with competent authorities; substantial reduction in duplication of documentary and verification steps between recognition and admission procedures.	Reduction in employer-borne information costs and dual-track coordination effort where recognition and migration procedures are articulated, consistent with the indicative cost reduction documented in Section 7.2.
Minimum mandatory information requirements at national level — applicable regime, documentation, timelines, fees, appeal rights (A3)	Binding right to clear, standardised, accessible information on the procedure, costs and rights; substantial reduction in information asymmetry.	Binding obligation to publish standardised information on national procedures; one-off update of information channels.	Binding obligation to publish standardised information for the academic comparability route.	Binding obligation to publish standardised information on admission procedures interfacing with recognition; one-off update of information channels.	Reliable, standardised information on national requirements; lower information costs in cross-border recruitment of third-country nationals.
Procedural guarantees: deadlines, substantiated decisions, right of appeal (A4)	Binding deadlines for acknowledgement of applications and substantiated decisions; right of appeal; substantial reduction in procedural uncertainty.	Binding obligation to comply with deadline rules and decision-justification standards; potential need for additional staff capacity to meet timeline obligations.	Binding obligation to comply with deadlines for the academic comparability assessment, where applicable.	Indirect effect through more predictable recognition timelines that feed into admission decisions; improved alignment of admission and recognition deadlines.	More predictable timelines facilitate workforce planning and reduce vacancy duration in regulated sectors, with proportionally larger benefits for SMEs operating under tighter workforce-planning constraints.
Common documentation rules and maximum number of documents (A5); obligation to accept documents in widely used migrant languages (A6)	Substantial reduction in document preparation, translation and legalisation costs; reduction in repeated requests for additional evidence.	Binding limitation on documentary requests; partial procedural reorganisation required; multilingual handling capacity required.	Binding limitation on documentary requirements for the comparability assessment; multilingual handling required.	Binding limitation on documentary requests applicable also where migration authorities verify qualifications within admission procedures; multilingual handling required.	Reduction in employer-supported documentation effort and associated time costs in cross-border recruitment.

Action / measure	TCNs	Competent authorities	ENIC-NARIC centres	Migration Authorities	Employers (incl. SMEs)
Common rules on fees, capped to the cost of the service (A7)	Predictable, proportionate fees; elimination of disproportionate charges; substantial reduction in unrecoverable upfront costs.	Binding fee structure aligned with cost of service; mandatory transparency on fee components.	Binding fee structure rules where ENIC-NARIC centres charge applicants directly.	Indirect effect: fee transparency in recognition reduces accumulated upfront costs faced by applicants seeking admission via labour-migration routes.	Predictable cost structure for HR departments managing cross-border recognition support of third-country nationals.
EU-level service for authenticity checks of qualifications issued in third countries (A8)	Faster verification of authenticity; lower probability of dossier rejection on documentary-authenticity grounds; reduction in case-by-case interaction with third-country authorities.	Reduced need for direct interaction with third country issuing institutions; binding cooperation with the EU-level service.	Reduced need for direct interaction with third country issuing institutions for the comparability assessment.	Reduced need for direct interaction with third country issuing institutions for qualification checks within admission procedures; access to the EU-level authenticity service.	Reduction in the residual risk associated with unverifiable foreign qualifications in recruitment decisions.
Interoperable national databases on the comparability of third-country qualifications (A9)	More consistent recognition outcomes for the same qualification across Member States; partial reduction in re-assessment costs for applicants moving between Member States.	Binding obligation to participate in the interoperable database; one-off setup costs and recurring maintenance.	Binding obligation to feed the interoperable database with comparability assessments and to align practice across Member States.	Access to consistent comparability information across Member States, reducing reassessment of third-country qualifications already evaluated in another Member State.	More consistent recognition outcomes facilitate intra-EU mobility of recognised third-country professionals and reduce employer-side residual risk.
Compensation measures where there are justified doubts on the quality of the third-country qualification system (A10)	More predictable framework on the conditions and scope of compensation measures; reduction in arbitrary variability.	Binding rules on the activation of compensation measures; structured assessment criteria.	Binding rules on the activation of compensation measures where ENIC-NARIC centres are involved.	Indirect effect: more predictable application of compensation measures supports clearer pathways between recognition and admission.	More predictable timing where compensation measures are required.
			Policy Option 3 — Common rules including automatic recognition for selected professions		
Common procedural rules including the foundation laid by Policy Option 2 (A1–A10)	Same effects as under Policy Option 2: predictable procedural framework, document and fee discipline, procedural guarantees, more consistent recognition outcomes.	Same obligations as under Policy Option 2.	Same obligations as under Policy Option 2.	Same effects as under Policy Option 2.	Same effects as under Policy Option 2.

Action / measure	TCNs	Competent authorities	ENIC-NARIC centres	Migration Authorities	Employers (incl. SMEs)
EU framework for the automatic recognition of selected third-country qualifications in regulated professions, based on prior verification of learning programmes against EU standards (A11)	Substantial reduction in procedure duration for sectoral professions covered by automatic recognition (typical procedure compressed to a verification of identity and credentials); elimination of compensation measures within the automatic-recognition route; substantial reduction in opportunity cost during waiting time.	Substantial simplification of the recognition procedure for the professions covered, where the case-by-case substantive assessment is replaced by a verification of credentials against the approved programme registry; one-off transition costs and process redesign.	Substantial reduction in caseload for the professions covered, where the academic comparability assessment is no longer required; partial repositioning of activities towards the unregulated and partially regulated remit.	Substantial simplification of qualification checks within admission decisions for the sectoral professions covered; reliance on the automatic-recognition outcome.	Materially faster availability of qualified third-country nationals in sectoral professions; substantial reduction in vacancy duration in healthcare and other shortage occupations covered by automatic recognition. Indicative employer-borne cost reduction of approximately 35–50 per cent for recruitments involving the seven sectoral professions.
Public EU register of approved third-country learning programmes eligible for automatic recognition (B15)	Transparent, ex-ante information on which qualifications follow the automatic-recognition route; reduction in pre-application uncertainty.	Authoritative reference for the verification step; reduction in case-by-case research effort.	Authoritative reference for the comparability assessment outside the automatic-recognition perimeter.	Authoritative reference for qualification checks within admission decisions, reducing case-by-case research effort.	Authoritative information on which qualifications enable predictable recruitment in regulated sectors.
Issuance of qualifications as verifiable digital credentials for automatic recognition (A12)	Verifiable digital format reduces document fraud risk; faster end-to-end procedure; lower translation and legalisation needs.	Authentication via digital credentials reduces verification effort; integration with national digital infrastructure required.	Authentication via digital credentials reduces verification effort for the comparability assessment.	Authentication via digital credentials reduces verification effort for qualification checks within admission procedures; integration with national migration IT systems required.	Verifiable credentials reduce employer-side residual risk in cross-border recruitment, with proportionally larger benefits for firms without dedicated HR capacity.
Common requirements on quality assurance and compensation measures within the automatic-recognition perimeter (A11 + A10)	Predictable conditions for the activation of compensation measures within the automatic-recognition route; more uniform application across Member States.	Binding rules ensuring uniform standards within the automatic-recognition perimeter; structured cooperation with the verification authority.	Indirect alignment with EU-level quality-assurance standards.	Predictable conditions for the activation of compensation measures within the automatic-recognition perimeter when interfacing with admission decisions.	Higher quality assurance supports employer trust in qualifications recognised through the automatic route.

Source: Authors' elaboration

Annex 3.2 Summary of benefits and costs

The tables below summarise the benefits and costs associated with the preferred policy option (Policy Option 3 — Common rules including automatic recognition for selected professions), drawing on the cost and welfare estimates presented in Section 7.2 and on the methodological framework set out in Annex 4.5. Benefits are expressed in monetary terms where the nature of the underlying effect and the available evidence support monetisation, consistent with the multi-layered quantification framework adopted for Action 3 (Annex 4.5). Where monetisation is not feasible, a qualitative direction-of-impact statement is provided. Aggregate monetary estimates are presented on a single baseline of approximately 62,500 procedures per year, the volume of recognition and validation procedures involving third-country nationals taking place in the absence of EU action. The baseline of approximately 62,500 procedures per year is the central value of a 40,000–85,000 convergence interval triangulated from five independent channels — the Action 3 Competent Authorities Survey, the EMN Ad-Hoc Query 2024.16 administrative data on medical-doctor recognition (approximately 46,365 applications across 10 reporting Member States in 2023), the BIBB official statistics on the recognition caseload of third-country nationals in Germany, the Eurostat first-permits-by-remunerated-activity dataset (migr_resocc) and the focus-group data forms.

Policy Option 3 is identified as the preferred option on the basis of the comparative analysis of the three options, which combines the quantitative estimates in Section 7.2 with the multi-criteria assessment in Section 8. Under Policy Option 3, per-procedure savings on the recognition-procedure dimension are in the order of EUR 420–600 (central estimate approximately EUR 510), corresponding to aggregate annual administrative savings of approximately EUR 16.8–24.3 million per year on the baseline of approximately 62,500 procedures per year. Expressed as a present value over an assessment period 2029 – 2040 discounted at 3 per cent (Tool #64), this corresponds to approximately EUR 192.3 million. The associated welfare gain from reduced waiting time is in the order of magnitude of EUR 300 million per year. The employer-borne administrative cost reduction in cross-border recruitment of third-country nationals is in the order of magnitude of EUR 14–30 million per year. The aggregate impact estimate on the recognition-procedure dimension, which combines administrative savings and welfare gain net of EU-level annualised implementation costs, is in the order of magnitude of EUR 318 million per year; the employer-borne component is presented separately as a complementary indicative estimate.

Policy Option 3 is assessed on a four-month sectoral processing time and an 85 per cent realisation factor. The quantified results are: per-procedure saving approximately EUR 420–600 (central approximately EUR 510); aggregate annual administrative saving approximately EUR 16.8–24.3 million (central approximately EUR 20.5 million), corresponding to a 2029-2024 present value of approximately EUR 192.3 million discounted at 3 per cent (Tool #64); welfare gain in the order of magnitude of EUR 300 million per year; aggregate impact estimate in the order of magnitude of–EUR 318 million per year. The employer-borne component (approximately EUR 14–30 million per year) is presented separately. Policy Option 3 is the preferred option. The full derivation and source traceability are documented in Section 7.2 and Annex 4.5 (cost framework) and Annex 4.6 (volume framework).

Table 15- Overview of benefits — Preferred Option: Policy Option 3

Description	Amount	Comments
Direct benefits		
Per-procedure administrative cost reduction for applicants and competent authorities (Level 1 — direct administrative effects)	Approx. EUR 420–600 per procedure (central: EUR 510)	Net saving per procedure post-realisation factor (85% under Policy Option 3). Components include the reduction in document preparation, translation and legalisation effort, the reduction in CA-side variable staff time, and the elimination of repeat requests for additional evidence[193]. See Section 7.2 (Policy Option 3) and Annex 4.5.
Aggregate annual administrative saving at system level (Level 1)	Approx. EUR 16.8–24.3 million per year (central: EUR 20.5 million)	Estimated on the baseline of approximately 62,500 procedures per year. Recipients: third-country nationals and competent authorities. See Section 7.2 and Annex 4.5; volume baseline rationale in Annex 4.6.
Welfare gain from reduced opportunity cost during the recognition waiting period (Level 3 — welfare-side estimation)	In the order of magnitude of EUR 300 million per year	Forgone earnings during the recognition waiting period, calibrated on the share of applicants either not working or working below their qualification level during the procedure (consultation evidence) and on the wage proxy from the Eurostat Structure of Earnings.[194] The estimate is reported as an order of magnitude consistent with its scenario-based and modelled nature. Excluded from the Level 1 aggregate to avoid double-counting. Recipients: third-country nationals; broader economy. See Section 7.2 (Level 3) and Annex 4.5.

[193] Survey targeted at TCNs (n=253); Survey targeted CAs (n=190), Survey targeted at ENIC NARIC services (n=18); Focus Group with CAs in the healthcare sector (n=31); Focus Group on access to regulated professions with CAs of electricians and crane operators (n=20); Eurostat earn_ses22_28.
[194] Survey 2022 (earn_ses22_28)

Description	Amount	Comments
Reduction in employer-borne administrative cost in cross-border recruitment of third-country nationals	Indicative aggregate saving in the order of magnitude of EUR 14–30 million per year (Policy Option 3); per-recruitment cost reduction of approximately 35–50 per cent for sectoral professions covered by automatic recognition	Baseline employer-borne administrative cost estimated at approximately EUR 800–1,200 per recruitment of a recognised third-country national, drawing on the SME Panel Survey (n=159, 2026), the focus group with employers (FG5 polls, n=19–26) and the public consultation employer/business sub-sample (n=118). Position papers from Business Europe (2026) and SME United (2026) corroborate the relevance of the dimension and the qualitative pattern. Aggregate estimate computed on an indicative volume of 62,500 recognition procedures per year of recognised third-country nationals, calibrated as a sub-set of the approximately 1.1 million first employment-related residence permits issued in the EU-27 in 2024 (Eurostat migr_resfirst). Robustness moderate-to-low; presented as a complementary indicative estimate, not added to the aggregate impact estimate. Recipients: employers, particularly SMEs. See Section 7.2 (employer-borne administrative costs) and Annex 6 (SME check).
Reduction in waiting time for sectoral professions covered by automatic recognition	Approx. 10.2 months reduction (from approx. 14.2 months baseline to approx. 4 months under automatic recognition)	Time gain calibrated on the actual processing-time evidence pooled from the dedicated TCN survey and the public consultation, and on the policy-design parameters of the automatic-recognition route. Particularly relevant for the seven sectoral professions covered by harmonised minimum training requirements under Directive 2005/36/EC (doctors, nurses, dentists, pharmacists, midwives, veterinary surgeons, architects). Recipients: third-country nationals in sectoral professions; healthcare and other shortage sectors. See Section 7.2 and Annex 4.5.

Description	Amount	Comments
Reduction in deterrence and increase in volume of recognition procedures	Indicative; not separately monetised	Removal of procedural barriers is expected to lead a share of currently deterred third-country nationals to come forward as active applicants. The dissuasion effect is documented in the public consultation and dedicated TCN survey, where a substantial share of respondents reported having postponed or abandoned recognition or mobility plans in the face of procedural complexity, cost and unpredictability. Each additional recognised third-country national represents a welfare gain for the individual (avoided forgone earnings and brain waste) and for host-country labour markets (reduced vacancy duration in shortage sectors). Recipients: third-country nationals; host-country labour markets. See Section 7.2 and Annex 4.5.
Indirect benefits		
Improved labour-market matching in shortage professions	Not directly monetised; significant positive direction	Faster, more predictable and more reliable recognition outcomes are expected to improve the availability of qualified third-country professionals in regulated sectors facing acute shortages, particularly in healthcare and the other sectoral professions. The European Labour Authority (2024) documents shortages of specialist medical practitioners in 75% of EU countries, generalist practitioners in 64%, and nurses in 78%. Recipients: general public, employers, service users in shortage sectors. See Section 7.1 and Section 7.2.
Reduction in brain waste	Not directly monetised within the SCM perimeter; reflected qualitatively in the welfare-side estimate (Level 3) and in the multi-criteria assessment	Faster recognition reduces the duration of overqualification and inactivity that affects third-country nationals during the waiting period, thereby releasing productive capacity into qualification-matched employment. The phenomenon is documented in the OECD Indicators of Immigrant Integration (Settling In) series, in the EMN-OECD 2025 study on labour-market integration of third-country nationals, and in the consultation evidence underpinning Section 7.2 (Level 3). Recipients: third-country nationals; broader economy.

Description	Amount	Comments
Enhanced EU attractiveness for global talent	Not directly monetised; positive direction reflected in the multi-criteria assessment	More predictable, simpler and faster recognition reduces a structural deterrent for skilled third-country nationals considering the EU as a labour-market destination, in line with the strategic objectives of the Union of Skills (COM(2025) 90 final) and with the recommendations of the EMN-OECD Inform 2025 on attracting foreign talent. Recipients: EU economy; sectors facing structural skills shortages.
Protection of fundamental rights	Positive; not quantified	The initiative supports the freedom to choose an occupation and engage in work (Article 15 of the Charter of Fundamental Rights of the European Union) by reducing arbitrary or inconsistent application of recognition requirements affecting third-country nationals. Standardised and enforceable procedures under Policy Option 3 reduce the scope for inconsistent or discriminatory application of recognition rules. Recipients: third-country nationals seeking recognition or validation across Member States.

Note: Quantitative estimates drawn from Section 7.2 and Annex 4.5; consultation evidence from the dedicated TCN survey, CA survey, NARIC survey, MA survey, public consultation, focus group DataForms, SME Panel Survey (2026, n=159) and the position papers of Business Europe (2026) and SME United (2026). Aggregate estimates based on a single baseline of approximately 62,500 procedures per year for the recognition-procedure dimension, as described in Annex 4.6, and on an indicative volume of 62.500 recognition procedures per year for the employer-borne dimension, as described in Section 7.2. (1) Estimates are relative to the baseline scenario for the preferred option. (2) For each item, the comments column specifies the main recipient stakeholder group. (3) Welfare-side and indirect benefits are presented as orders of magnitude or qualitative directions of impact, consistent with the multi-layered quantification framework set out in Annex 4.5. (4) The employer-borne administrative cost reduction is presented as a complementary indicative estimate and is not added to the aggregate impact estimate.

Source: Authors' elaboration.

Table 16- Overview of costs — Preferred Option: Policy Option 3

	Citizens / Third-country nationals	Businesses (incl. SMEs)	Public administrations
	One-off / Recurrent	***One-off / Recurrent***	***One-off / Recurrent***
Direct adjustment costs	One-off: nil — no new compliance obligation on third-country applicants. Recurrent: nil; per-procedure costs are reduced relative to the baseline.	One-off: marginal HR adaptation costs for employers operating in regulated sectors with active cross-border recruitment of third-country nationals (familiarisation with the new recognition framework, including the automatic-recognition route for sectoral professions). Recurrent: nil; per-recruitment costs are reduced relative to the baseline by approximately 35–50 per cent for sectoral professions (see Section 7.2).	One-off: substantial Member State-level adaptation costs for the implementation of the automatic-recognition framework, the verifiable digital credentials infrastructure and the interoperable database on the comparability of third-country qualifications. Recurrent: ongoing maintenance of national systems and participation in EU-level coordination structures.
Direct administrative costs	One-off: nil. Recurrent: net reduction. The applicant-borne component of the administrative cost reduction is integral to the per-procedure saving of approximately EUR 510 (central estimate) under Policy Option 3, encompassing reduced documentation, translation, legalisation and fee components. See Section 7.2 and Annex 4.5.	One-off: nil. Recurrent: net reduction in employer-supported administrative time during cross-border recruitment of third-country nationals. Indicative aggregate saving in the order of magnitude of EUR 14–30 million per year on the volume baseline of approximately 62,500 recognition procedures per year of recognised third-country nationals; per-recruitment baseline cost approximately EUR 800–1,200, reduced by approximately 35–50 per cent for the sectoral professions covered by automatic recognition. See Section 7.2 (employer-borne administrative costs) and Annex 6 (SME check).	One-off: nil new recurrent administrative cost. Recurrent: net reduction in CA-side variable staff time per procedure, integral to the per-procedure saving of approximately EUR 510. At system level, on the baseline of approximately 62,500 procedures per year, the aggregate administrative saving is approximately EUR 16.8–24.3 million per year (central estimate approximately EUR 20.5 million). See Section 7.2 and Annex 4.5.

	Citizens / Third-country nationals	Businesses (incl. SMEs)	Public administrations
Implementation costs (one-off)	Nil.	Marginal one-off familiarisation costs for HR functions in firms recruiting third-country nationals; not separately quantified.	EU-level one-off implementation cost: approximately EUR 15–25 million (central estimate approximately EUR 33.5 million), covering the development of the EU framework for the automatic recognition of selected qualifications, the EU-level service for authenticity checks, the public register of approved third-country learning programmes and the supporting digital infrastructure. Member State-level one-off implementation cost: in the order of EUR 200,000–500,000 per Member State, depending on the maturity of national digital infrastructure and on the integration effort required by the interoperable database on the comparability of third-country qualifications. Annualised over a 2029-2040 horizon, the EU-level component corresponds to approximately EUR 2 million per year.

Source: Authors' elaboration based on Section 7.2 and Annex 4.5; consultation evidence from the dedicated TCN survey, CA survey, NARIC survey, MA survey, public consultation, focus group DataForms, SME Panel Survey (2026, n=159), Business Europe (2026) and SME United (2026). (1) Administrative cost reduction estimates derived from the analytical framework set out in Annex 4.5, applied to the volume baseline documented in Annex 4.6 and in Section 7.2. (2) The applicant-borne and CA-borne components of the per-procedure saving are not separately allocated in the table, consistent with the integrated per-procedure unit applied throughout Section 7.2. (3) The employer-borne component is presented as a complementary indicative estimate. (4) Member State-level implementation costs are presented separately and are not deducted from the aggregate impact estimate, given the substantial heterogeneity of national starting conditions, system maturity and integration pathways across Member State

Annex 3.3 Relevant sustainable development goals

The initiative is relevant to four of the United Nations Sustainable Development Goals, as summarised in the table below. The most directly relevant goals are SDG 8 (Decent Work and Economic Growth) and SDG 10 (Reduced Inequalities), which represent the primary impact channels of the initiative and reflect its core objective of removing structural barriers to the labour-market participation of qualified third-country nationals. SDG 4 (Quality Education) and SDG 17 (Partnerships for the Goals) are indirectly relevant through the initiative's effects on the recognition of third-country qualifications acquired through formal education and on cross-border institutional cooperation between Member States and third countries on qualification matters.

Table 17- Overview of relevant Sustainable Development Goals — Preferred Option: Policy Option 3

Relevant SDG	Expected progress towards the Goal	Comments
SDG 4 — Quality Education	Expected strengthening of the recognition of qualifications acquired through formal education and vocational training in third countries, supporting the link between educational attainment in countries of origin and effective labour-market access in the European Union.	Targets 4.3 (equal access to technical, vocational and tertiary education) and 4.4 (relevant skills for employment) are addressed through the initiative's contribution to the recognition of qualifications acquired by third-country nationals. Under Policy Option 3, the EU framework for the automatic recognition of selected qualifications (A11), based on prior verification of learning programmes against EU standards, supports the cross-border value of qualifications obtained through formal education and training in third countries that meet EU quality and training standards. The public register of approved third-country learning programmes (B15) reinforces the link between educational attainment and labour-market recognition.
SDG 8 — Decent Work and Economic Growth	Expected reduction in the structural barriers to labour-market participation faced by qualified third-country nationals; an indicative time gain of approximately 10.2 months for sectoral professions covered by automatic recognition; aggregate annual administrative saving of approximately EUR 16.8–24.3 million per year on the baseline; welfare gain from reduced waiting time in the order of magnitude of EUR 300 million per year on the baseline; indicative employer-borne administrative cost saving in the order of magnitude of EUR 14–30 million per year..	Targets 8.5 (full and productive employment and decent work for all, including migrants) and 8.8 (protection of labour rights and promotion of safe and secure working environments for migrant workers) are directly addressed by the initiative. By reducing the duration of forced inactivity and overqualification during the recognition procedure, Policy Option 3 supports access to qualification-matched employment and contributes to the productive use of the human capital of third-country nationals already present in the European Union, in line with the Union of Skills communication (COM(2025) 90 final). The brain-waste phenomenon documented in the OECD Settling In indicators and in the EMN-OECD 2025 study on labour-market integration of third-country nationals is materially reduced.

Relevant SDG	Expected progress towards the Goal	Comments
SDG 10 — Reduced Inequalities	Expected reduction in inequality of access to qualification-matched employment based on national origin; more uniform application of recognition rules across Member States; reduction in the procedural burden that disproportionately affects applicants without dedicated administrative support.	Targets 10.2 (empowerment and inclusion of all, irrespective of origin) and 10.7 (facilitation of orderly, safe, regular and responsible migration and mobility) are central to the initiative. Common procedural rules and the elimination of arbitrary documentary and fee variation reduce the inequality of access to recognition that currently affects third-country nationals. The protection of the freedom to choose an occupation (Article 15 of the Charter) is reinforced by the procedural guarantees, decision-justification standards and right of appeal introduced under Policy Option 3.
SDG 16 — Peace, Justice and Strong Institutions	Expected strengthening of cross-border institutional cooperation between Member States and with third-country authorities, supporting the rule-of-law and accountability dimensions of recognition decisions through the binding procedural guarantees, decision-justification standards and right of appeal introduced under Policy Option 3.	The initiative contributes indirectly but materially to SDG 16, in particular to targets 16.6 (effective, accountable and transparent institutions at all levels) and 16.b (non-discriminatory laws and policies). The contribution operates through three complementary channels introduced under Policy Option 3: common procedural guarantees and minimum decision-justification standards for the recognition of third-country qualifications (measure A4), a verifiable authenticity-check infrastructure based on the EU authenticity-check service (measure A8) and the shared comparability database (measure A9), and a reinforced right of appeal against negative or partial recognition decisions. The combined effect is expected to reduce the incidence of unmotivated or inconsistent decisions across Member States, to enhance procedural fairness for third-country applicants and to improve the institutional accountability of competent authorities. Indirect benefits are also expected on the integrity of recognition systems through the fraud and authenticity checklists and digital verification tools developed under measure B10. The accountability gains accrue primarily to third-country applicants currently exposed to heterogeneous and partly opaque procedures across Member States, as documented in the survey evidence on procedural fragmentation; the magnitude of the contribution is qualitative and complementary to the primary impact channels captured under SDG 8 and SDG 10.

Annex 4. Analytical methods

Annex 4.1 Cost estimation framework and baseline

The recognition procedure for TCQs generates costs and welfare effects that fall along two analytical dimensions, in line with Better Regulation methodology on direct and indirect costs and benefits. **Direct costs** are those incurred per recognition procedure by applicants and competent authorities and entered in the per-procedure unit-cost baseline used throughout the quantification. **Indirect costs** and **welfare effects** are those borne by applicants beyond the procedural perimeter (forgone earnings during the waiting period) and by society as a whole (productivity loss, deterrence, brain waste, attractiveness, fundamental-rights and procedural-fairness dimensions), reported separately to avoid double counting and to preserve transparency between monetised and qualitatively assessed effects.

Table 18 — Unit-cost components of the recognition procedure (direct costs)

Dimension	Explanation
Direct costs to TCN applicants — fees	Application fee at the host competent authority (median EUR 350–500; NARIC survey; route-dependent variation EUR 130–1,390); fee at ENIC-NARIC where applicable.
Direct costs to TCN applicants — non-fee	Certified translation; legalisation / apostille; notarisation; postal, courier and additional documentation costs (TCN survey Q18; CA survey Q17, n=125/190 identifying certified translation as a typical cost component).
Host competent authority — staff and case-handling costs	Staff time and FTE costs for case assessment, verification, decision-making (CA survey Q37, valid n=94–118).
Host competent authority — IT implementation costs	Set-up and maintenance of national IT systems for processing TCN qualification dossiers, interoperability interfaces with EU-level services under PO2/PO3 (comparability database A9, authenticity-check service A8) and, where applicable, digital credentials verification under PO3 (A12). Costs concern the host CA and its interfaces; no separate third-country IT cost is borne under Action 3.
Third-country cooperation costs	Costs of bilateral information exchange with third countries issuing institutions for qualification verification and authenticity checks; reduced under PO2/PO3 through the EU-level authenticity-check service (A8).

Note: Per-procedure baseline EUR 1,300–1,550 (central ≈ EUR 1,400), built as a weighted average across four recognition routes; equivalent in order of magnitude to the pooled mean of applicant-side and CA-side cost components (≈ EUR 1,500), retained as upper-bound check. Fees are not levied in a sub-set of recognition procedures and Member States.

Source: CA survey, NARIC survey, TCN survey, focus group dataforms.

Table 19 - Welfare and societal costs linked to the recognition procedure (indirect costs)

Dimension	Explanation
Welfare cost to TCN applicants — forgone earnings during the waiting period (quantitative)	Forgone earnings of applicants during the recognition waiting period, capturing the labour-market opportunity cost of the unrecognised qualification. Estimated as: number of recognition applications × processing-time reduction × monthly labour-market opportunity-cost proxy (Eurostat earn_ses22_28 ISCO-2, EUR 4,290/month central; range 3,500–5,000; mean annual earnings by occupation, ISCO-2, reference year 2022; applied as an upper-bound reference to the recognition-seeking population, which is predominantly tertiary-educated[195] since recognition concerns formal qualifications) × share of applicants working below their qualification level during the procedure (TCN survey Q15 = 49.3%, n=152). Conservatively framed as order-of-magnitude estimate.
Welfare cost to society — productivity effects (quantitative)	Broader economic value of improved utilisation of qualifications in the labour market: GDP-equivalent gain estimated as a sectoral productivity multiplier on activated procedures (latent demand pool × activation rate). Order of magnitude; presented separately to avoid double counting with applicant-side welfare.
Welfare cost to society — labour-market consequences (qualitative)	Deterrence effect on latent demand for recognition; brain waste (under-utilisation of foreign qualifications); reduced EU attractiveness for skilled third-country workers; constrained intra-EU mobility of recognised professionals.
Welfare cost to society — fundamental-rights and rule-of-law dimensions (qualitative)	Practical exercise of rights linked to access to employment, fair and transparent administrative treatment, equality of opportunity, non-discrimination, right to good administration.

Qualitative dimensions feed the MCDA.

Source: TCN survey (Q13, Q15, Q18); Eurostat earn_ses22_28; EMN-OECD 2025; ECA Special Report 10/2024; consultation evidence; focus group polls. Qualitative dimensions feed the MCDA.

Quantification/monetisation of costs - sources and their robustness

The recognition procedure for TCQs generates four types of cost. The first are the direct, per-procedure costs paid by applicants and met by competent authorities to handle each individual case. The second are the overhead and implementation costs that recognition systems incur at institutional level — staff time, IT systems and cooperation with third countries. The third type covers welfare-side effects: the income that applicants forgo while they wait for a decision, and the wider productivity value of having recognised professionals integrated more rapidly into the labour market. The fourth type captures social effects that cannot reasonably be put in monetary terms — deterrence of latent applicants, brain waste, EU attractiveness for skilled workers, and the fundamental-rights

[195] In the dedicated TCN survey, around 94 per cent of respondents reported a tertiary qualification (Master's 55 per cent, Bachelor's 32 per cent, PhD 8 per cent; n=154). This confirms that the recognition-seeking population differs from the migrant working-age population as a whole, for which the tertiary share is lower; the ISCO-2 earnings level is therefore used as an upper-bound reference proxy for this subgroup.

and procedural-fairness dimensions of recognition. These four categories follow the Better Regulation Toolbox typology: the first two are administrative costs; the third are indirect economic effects on individuals and the wider economy, which become benefits when reduced; the fourth feeds the multi-criteria decision analysis in Section 8. The "Level 1–4" labels are kept throughout the annex only as a convenient way to order the analysis by methodological robustness; they do not depart from the Toolbox terminology, and cost-savings are reported as benefits.

The robustness classification used in the matrix below rests on three criteria: where the parameter comes from (primary survey or focus group evidence versus secondary or benchmark-based sources), whether it can be triangulated across independent sources, and how much it relies on calibration or scenario assumptions. We label a parameter "high" robustness when it is anchored on primary survey evidence and corroborated by at least one independent source. "Medium-to-high" applies to parameters from primary survey evidence with limited triangulation. "Medium-to-low" applies to parameters that still rest on primary evidence but require scenario-based calibration — this is the case of the welfare-side estimation, where the value of time saved is bounded by conservatively framed assumptions rather than mechanically monetised. "Low" applies to parameters derived from benchmark projections or from qualitative evidence translated into quantitative ranges, without triangulation.

Table 20 — Multilayer quantification framework: nature and robustness of the dimensions covered in this annex

Dimension	Source for the quantification	Robustness
Level 1 — Direct per-procedure costs	Observed procedural cost components from dedicated TCN survey, CA survey, NARIC survey and focus group DataForms	Medium-high
Level 2 — CA overhead costs	Qualitatively documented through CA survey Q37; not entering per-procedure SCM calculations	Medium
IT implementation costs	Benchmark-based projections from comparable EU digital infrastructure initiatives, with single point estimate from focus group DataForms	Low
Third-country cooperation costs	Triangulated qualitative-quantitative evidence from NARIC survey, CA survey and MPF Mapping 2024	Low
Level 3 — Welfare-side estimation	Forgone earnings during recognition waiting period, calibrated on inactivity rate and wage proxy	Medium-low
GDP-equivalent measure	Macro proxy through sectoral productivity multipliers: gross value added per person employed, current euro, NACE Rev. 2 (total economy, H–Q services aggregate for the sectorally-weighted variant) (Eurostat nama_10_a64)	Medium - Low
Level 4 — Qualitative dimensions	Deterrence, brain waste, attractiveness; not monetised, reflected in MCDA scoring	Not monetised

Source: Authors' elaboration.

Quantification relies on triangulated evidence — pooled survey data, focus group DataForms and benchmark-based calibration — rather than on a single integrated

procedural dataset. Granular and observable values are reported as approximations, while aggregate or modelled values are reported as orders of magnitude. The robustness classification of each parameter reflects three criteria: the type of source, the availability of independent triangulation, and the extent to which scenario-based calibration is required.

Level 1 — Direct per-procedure costs per third-country national applicant: baseline

The per-procedure cost incurred by third-country national applicants is estimated using a two-part decomposition of the TCN survey data (Q18). This approach separates the extensive margin — the share of applicants who report any positive cost — from the intensive margin — the level of the cost conditional on a positive cost being incurred. Among complex sectoral dossiers (healthcare and legal professions), higher cost levels are typically observed due to extensive translation, notarisation and compensation measures (Directive 2005/36/EC, Title III, Chapter III). The two-part decomposition is well suited to cost data with a substantial share of zero values and a right-skewed positive distribution. The alternative of a single mean over the full sample would conflate procedurally heterogeneous regimes (fee-waived and standard procedures) and would mask the cost level actually borne by paying applicants; the trade-off is the loss of a single headline figure, since the two parts are read jointly. The 15.9 per cent (24 of 151) of TCN respondents reporting zero procedural cost correspond to procedures where the cost is borne by the public administration, fee-waiver regimes or national subsidy schemes — documented in Annex 10 (legal analysis and mapping of national procedures), which records such regimes in a sub-set of Member States and specific procedural pathways.

Question 18 of the dedicated TCN survey asked respondents to indicate the total procedural cost in seven bins: zero; EUR 1–250; EUR 251–500; EUR 501–1,000; EUR 1,001–1,500; EUR 1,501–2,500; and an open-ended bin above EUR 2,500[1]. Of 151 respondents, 15.9 per cent (24 of 151) reported zero procedural costs[2]; the remaining 84.1 per cent (127 of 151) reported positive costs. The 15.9 per cent share is the extensive margin (respondents in the zero-cost regime), and the 127 positive-cost responses form the basis for the intensive margin (cost level conditional on a positive cost being incurred), reported in the subsequent paragraph. Among the **127 cost-incurring applicants (intensive margin)**, 33 of 127 reported total costs above EUR 2,500, pointing to right-skewed cost-distribution. The median of the cost distribution among the 127 cost-incurring applicants is in the EUR 501–EUR 1,000 bin (midpoint EUR 750). The mean is approximately EUR 1,530 (calculated using bin midpoints with a prudential cap of EUR 3,750 on the open-ended top bin, set at 1.5× the lower bound of that bin as a conservative analytical choice).[196]

[196] The pooled (weighted) mean over the full sample (including zero costs) is approximately EUR 1,285

The component-level breakdown (table 17) covers six categories captured in question 18: application fee at the host competent authority, fee at ENIC-NARIC where applicable, certified translation of qualification documents, legalisation or apostille fees, notarisation costs, postal or courier charges, and additional documentation costs. These figures are interpreted as EU-26 central estimates (DK not part of the study perimeter) across heterogeneous procedures, professions and Member States, not as uniform costs applicable to all cases, given that costs vary substantially between sectoral procedures (where the seven professions[197]) and general system procedures, and across Member States with different fee structures and documentation requirements. A single EU central estimate is reported because the survey sample, while heterogeneous, is too small for stable national point estimates; cross-country variation is documented qualitatively in Annex 10, and the range bounds (EUR 1,300–1,550 around the central EUR 1,400) capture the principal source of variation across recognition routes. The central estimate provides a reasonable EU-level proxy because it is anchored on the procedures that account for the bulk of third-country recognition demand — healthcare and the seven sectoral professions — which dominate the observed flow.

Table 21- Breakdown of per-procedure direct costs borne by third-country national applicants.

Cost component (TCN-borne)	Median (positive-cost cases only, EUR)	Mean (positive-cost cases only, EUR)	Share / number reporting zero fees or costs	Source
Application fee at host competent authority	150	256	5.3% [5/94]	CA survey Q17 (n=94 cleaned; 89 fee-charging)
Fee at ENIC-NARIC (when consulted)	130	145	27.8% [5/18]	NARIC survey Q12 (n=18; 14 intensive)
Certified translation of qualification documents	200	300	n/a*	TCN survey Q18
Legalisation / apostille of foreign documents	100	150	n/a*	TCN survey Q18
Notarisation costs	50	80	n/a*	TCN survey Q18
Postal / courier / additional documentation	30	40	n/a*	TCN survey Q18

[197] The seven sectoral professions are doctor of medicine, nurse responsible for general care, dental practitioner, veterinary surgeon, midwife, pharmacist and architect, as set out in Title III, Chapter III of Directive 2005/36/EC.

Cost component (TCN-borne)	Median (positive-cost cases only, EUR)	Mean (positive-cost cases only, EUR)	Share / number reporting zero fees or costs	Source
Total per procedure (TCN-borne, all components)	**EUR 501–1,000 bin (midpoint 750)**	**1,530**	**15.9% [24/151]**	**TCN survey Q18 (n=151), bin-midpoint**

Note: "Positive-cost cases only" refers to respondents reporting a positive cost. The ENIC-NARIC fee applies only when ENIC-NARIC is consulted in addition to the host competent authority. The share of zero-cost cases is not separately captured for translation, legalisation, notarisation and postal components: Q18 records total procedural cost per respondent, not per component. Source: TCN survey Q18 (n=151), CA survey Q17 (n=94 cleaned), Q12 (n=107) and Q13 (n=58); NARIC survey Q12 (n=18); SME Panel Survey 2026 (employer-borne cost components, used as order-of-magnitude consistency check); Source: Authors' elaboration.

Component-level values rely on different primary sources: the application fee (CA Q17) and the ENIC-NARIC fee (NARIC Q12) each rest on a single primary source, without triangulation across multiple primary sources; the other components are derived from TCN-reported total costs (Q18) and supplemented by national mappings and focus group dataforms. The per-procedure baseline range (EUR 1,300–1,550 around the central EUR 1,400) reflects the four recognition routes (regulated profession with prior ENIC-NARIC step; regulated profession with direct competent-authority procedure; non-regulated qualification recognition; qualification check within the migration procedure). The differentiation across applicant scenarios — including TCNs going through a migration-side qualification check without seeking access to a regulated profession — is reflected in the range bounds; migration-authority costs are documented in Annex 3 (Migration Authorities column of the practical implications table). Given the limited NARIC sample (n=18 of approximately 30 ENIC-NARIC centres in the EU and EEA), percentages on the NARIC row should be read alongside the absolute counts, consistent with the Better Regulation Toolbox guidance on caution with samples below 100. The SME Panel Survey 2026 provides employer-borne fee data used as an order-of-magnitude consistency check (recruitment-related cost mean EUR 1,619, bridging/training EUR 526, external consultancy EUR 545, fees for recognition bodies EUR 407, internal administrative time EUR 354).

Two cost components rest on a single primary source and warrant specific methodological comment: the application fee at the host competent authority (CA survey Q17) and the fee at ENIC-NARIC (NARIC survey Q12). They are presented first because their distributions capture the coexistence of fee-waived and fee-charging regimes, which helps interpret the TCN survey responses to Q18 on the total per-procedure cost.

For the application fee, the 108 free-text responses to question 17 of the CA survey were processed through a structured cleaning procedure. Numerical responses (e.g. "150

EUR", "100–200 EUR", "32,00 euro", "around 300 EUR") were extracted; ranges were converted to their internal mean (e.g. "100–200 EUR" → 150); non-Euro responses were converted to EUR at 2026 average rates (SEK, HUF, RON, PLN, AZN); responses signalling absence of a fee ("no application fees", "procedura gratuita", "not applicable", "free") were coded as zero; non-quantifiable text ("depends", "according to BAO", "marca da bollo", "unknown") was excluded. The resulting cleaned distribution comprises 94 valid numerical observations, of which 5 (5.3 per cent) report a fee-waived regime and 89 (94.7 per cent) report a positive application fee.

The distribution reflects the coexistence of two distinct procedural regimes across the EU-26: a regime where competent authorities operate on a fee-waived basis, and a regime where a positive application fee is charged. The fee-waived regime is documented in 5 of 94 cleaned responses (5.3 per cent) and includes responses such as “procedure gratuite” (France), “no application fees” (Malta CPCM), “compliant with legal regulations” (Poland) and “não aplicável” (Portugal).

The fee-charging regime is documented in the remaining 89 of 94 responses (94.7 per cent), with values ranging from EUR 12 (Malta) to EUR 1,971 (Netherlands). Given the structural proportion of zero observations, which reflects a distinct fee-waived regime rather than the lower tail of a unimodal distribution, the application fee component is reported through a two-part summary that decomposes the extensive margin (the share of competent authorities operating under each regime) and the intensive margin (the level of the fee conditional on a fee being charged). On the intensive margin, the fee distribution among the 89 fee-charging competent authorities exhibits a median of EUR 150, a mean of EUR 256 and an inter-quartile range of EUR 50–EUR 260, with the right-skewed distribution driven by a small number of high-end observations corresponding to specific decision fees in the Netherlands (EUR 1,520 for the BIG-register procedure for healthcare professions) and Finland (EUR 1,390–EUR 2,620 for medical doctor recognition). A sensitivity test excluding these two high-end observations brings the intensive-margin mean from EUR 256 to approximately EUR 221, while the median remains at EUR 150 (insensitive to the outliers).On the extensive margin, the 5.3 per cent fee-waived regime is reported separately as a policy-relevant feature of the recognition landscape rather than as a cluster of zero-valued observations within the fee distribution. For the cost framework, the central anchor for the fee component is set at EUR 150 (the median of the fee-charging distribution), with the policy-relevant qualification that approximately 5 per cent of competent authorities operate under a fee-waived regime.

A similar two-part logic applies to the ENIC-NARIC fee distribution (Q12), where 27.8 per cent of centres operate under a fee-waived regime and the remaining 72.2 per cent apply either fixed or variable fees depending on the type of recognition service requested; on the intensive margin (n=14 numerical values), the median fee is approximately EUR 130

and the mean is approximately EUR 145, with the higher-end values (up to EUR 495) corresponding to specific decision fees and full recognition certificates.

For the certified translation component, the median of approximately EUR 200 reflects the typical cost of sworn translation of a multi-page qualification dossier across EU Member States, with the right-skewed distribution driven by complex healthcare and legal profession dossiers requiring full translation of curricular content, internship records and professional licences. The figure is consistent with the range typically reported for sworn translation services across EU Member States and is corroborated by the multi-select responses to question 17 of the CA survey, where 65.8 per cent of competent authorities (n=125 of 190) identified translation as a typical cost component (Q17 wording: "translation costs", without further specification on whether certified; the separate CA Q12 documents that certified translation is required by the majority of competent authorities for foreign-language qualification documents). For the legalisation or apostille fees, the median of approximately EUR 100 reflects the fee level in Member States that have ratified the Hague Apostille Convention (1961), with substantial variability across third countries (apostille is not available for documents issued in non-Convention countries, requiring full diplomatic legalisation at higher cost). The component is identified as a typical cost by 41.1 per cent of competent authorities (n=78 of 190) in question 17 of the CA survey, and is corroborated by the dedicated question 13 of the CA survey on documents typically requiring legalisation, with the share rising to over 60 per cent for procedures involving documents from non-Convention countries.

The variable per-procedure CA-side cost (the variable per-procedure CA-side cost) are based on the focus group DataForms. (FG1+FG2, n=8, of which 5 with numerical values), which report cost per recognition application borne by the institution in the range EUR 130 (Estonia) to EUR 1,390–EUR 2,620 (Finland), with a median of approximately EUR 350–EUR 500 across the countries reporting numerical values. The "central" scenario refers to the median value across the dataforms reporting numerical estimates. The sample is small (n=5 numerical values out of 8 dataforms) and is reported as an indicative order of magnitude, not a robust point estimate; this is the principal reason for the medium-to-low robustness label attached to this cost component. The migration-authority side of the variable cost is documented in Annex 3 (Migration Authorities column of the practical implications table). The differentiation across recognition routes — rather than a single uniform value — is captured by the per-procedure baseline range (EUR 1,300–1,550 around the central EUR 1,400) built across the four routes.

For the framework, the CA-side variable cost per procedure is set at EUR 400 (central scenario, range EUR 130–EUR 700), with the wide range reflecting the heterogeneity of procedural complexity across countries (regulated profession, sectoral vs general system, language regime). The total per-procedure burden, summing the applicant-side direct cost and the CA-side variable cost, is therefore approximately EUR 1,500 (central scenario,

range EUR 630–EUR 2,450), which serves as the baseline reference for the per-procedure cost reduction calculations under each policy option.

The per-procedure baseline is constructed as a weighted average across four recognition routes, rather than as a single pooled sum of all observed fee components. The pooled construction set out above is retained as an upper-bound envelope, but it does not reflect the fact that, for the large majority of applicants, only a sub-set of the fee components applies, depending on the route followed. The four routes are: Route A — competent-authority-only, for regulated professions where the competent authority is the sole decision-making body (applicants pay the competent-authority fee and not an ENIC-NARIC fee); Route B — ENIC-NARIC only, for academic comparability and access to unregulated activities (applicants pay the ENIC-NARIC fee and not a competent-authority fee, and typically submit a lighter documentary dossier — diploma and transcript — so that certified-translation needs are lower); Route C — sequential, where an ENIC-NARIC preparatory statement precedes a competent-authority decision (a sub-set of regulated-profession cases in which both fees, and in some cases duplicated translations, are incurred); and Route D — the migration–recognition interface, capturing third-party fees, the cost of an ENIC-NARIC statement required by a migration authority, and duplicated translation where the qualifications evidence collected for the migration procedure is not transferable to the subsequent recognition procedure.

The competent-authority fee and the ENIC-NARIC fee are therefore treated as route-dependent and, for the majority of applicants, mutually alternative rather than additive: under Route A only the competent-authority fee is paid; under Route B only the ENIC-NARIC fee; both are incurred only under Route C and, in the form of an accompanying statement, under Route D. On the question of migration-procedure fees, the Migration Authorities survey (Q17) records no fee specifically linked to a skills- or qualifications-check in the dominant case (14 of 14 reporting Member States); where indirect fees exist, they are charged by third parties (other public bodies in AT, LT, NL, PL, PT; professional regulators in NL and PL, of the order of EUR 115–150). Duplication of qualification checks between the migration procedure and a subsequent competent-authority procedure is structurally documented where formal recognition must precede the EU Blue Card decision (CZ, NL, SK) and, more broadly, in the Member States operating in sequential mode (Migration Authorities survey Q15: BE, CZ, FR, HU, LT, PL, PT, SK, SE). Documentary costs (certified translation, apostille/legalisation, notarisation) are accordingly reported as route-specific ranges rather than as uniform pooled values: lighter for Route B (diploma and transcript only), heavier for Route A (full curricular dossier), and highest for Routes C and D, where translations may be required separately by two institutions for the same qualification.

The route weights are an indicative calibration, not an empirically observed distribution: they are informed by the CA survey (Q17, n=94 cleaned), the NARIC survey (Q12, n=18;

n=14 numerical values) and the mapping of recognition procedures (Annex 8, which documents seven Member States where both bodies are involved in regulated-profession recognition, supporting Route C), but the surveys do not yield an observed split of the applicant population across the four routes. The weights Route A 50 per cent, Route B 25 per cent, Route C 15 per cent and Route D 10 per cent are therefore presented expressly as a working calibration and tested in the sensitivity analysis, not as a measured share. On the competent-authority-side cost, the figure is cross-checked across two independent channels rather than relying on a single anchor: the focus-group DataForms (FG1+FG2, n=8, of which 5 numerical, EUR 130 in Estonia to EUR 1,390–2,620 in Finland, median approximately EUR 350–500), and — as a corroborating cross-check, not a direct estimate — "an extrapolation from the administrative-budget data for establishment procedures under the Professional Qualifications Directive (sourced from the parallel Action 2 work), scaled upward by an indicative 30–50 per cent to reflect the documented additional third-country complexity (more frequent compensation measures — CA survey Q28; full diplomatic legalisation for non-Convention countries in approximately 60 per cent of cases — CA survey Q17/Q28; language barriers — CA survey Q28, 53.7 per cent). The extrapolation is explicitly an order-of-magnitude cross-check that converges with, and does not replace, the focus-group anchor; the resulting CA-side cost is reported as a range, not a point estimate. Question 9 of the Action 3 CA survey was an open-ended free-text field and is not amenable to monetary aggregation, which is why the competent-authority-side cost is not estimated directly from a single survey item. Under the multi-route construction, the system-level per-procedure baseline remains in the broad order of EUR 1,300–1,550 (central approximately EUR 1,400): the level of the baseline is essentially unchanged, but it is now built route by route, the savings percentages become differentiable by route, and the comparative ranking of the three policy options is unchanged.

Question 17 of the dedicated TCN survey records the income level of respondents during or immediately after the recognition procedure: the bin-midpoint analysis on the n=115 respondents declaring an income (excluding 15.2 per cent “not working” and 7.9 per cent “prefer not to say”) yields a mean monthly income of approximately EUR 2,220, equivalent to approximately EUR 26,640 per year. This figure is lower than the wage proxy of approximately EUR 51,000 per year (ISCO-08 group 2 Professionals, EU-27, Eurostat earn_ses22_28) used in the opportunity cost calculation at Level 3, and the gap between the two values is consistent with the under-qualification of the working sub-group during the recognition waiting period — in line with the empirical Q15 finding of 49.3 per cent of respondents working below their qualification level during the procedure. The opportunity cost dimension is treated quantitatively at Level 3 and qualitatively at Level 4; these components are excluded from the SCM baseline to avoid double-counting.

Table 16b. Baseline per-procedure cost components

Component	Central (EUR)	Range (EUR)	Source
Application fee at host CA	150	130–350	CA survey Q17 (n=94)
ENIC-NARIC fee (when consulted)	145	50–250	NARIC survey Q12 (n=14)
Certified translation	200	—	TCN survey Q18; CA Q17 (125/190)
Legalisation / apostille	100	—	TCN survey Q18; CA Q13
Notarisation	80	—	TCN survey Q18
Postal / courier	40	—	TCN survey Q18
Applicant-side subtotal	**~1,100**	**500–1,750**	TCN survey Q18 (n=151)
CA-side variable cost	400	130–700	FG DataForms FG1+FG2
Total per-procedure baseline	**~1,500**	**630–2,450**	Authors' elaboration

Cost model for migration-related qualification checks in non-regulated professions

Scope and population

The cost framework above concerns recognition procedures for regulated professions. This sub-section sets out the parallel cost model for the qualification-related checks carried out within migration procedures for access to non-regulated professions, developed to disaggregate the annual volume of first residence permits involving an element of qualification assessment and to estimate the cost of the non-regulated component separately. The model sits alongside the regulated-profession model and does not replace it; the two populations are additive and are reported separately throughout.

The population is derived as a residual within the qualification-assessment pool. This pool comprises the approximately 125,000 first residence permits issued each year under the EU Blue Card, the researchers' visa and the national highly skilled migration pathways, all of which require proof of a verified education degree or equivalent upper-level vocational training. Of these, approximately 62,500 relate to regulated professions, corresponding to the central value of the 40,000–85,000 convergence interval established in Annex 4.6. The remaining share, of the order of 62,000 to 63,000 checks per year, is the non-regulated component. It is reported as a range rather than as a single figure because it inherits the uncertainty surrounding the regulated-profession share: it is derived

as the difference between two estimates drawn from the same qualification-assessment pool rather than from an independently observed population.

Heterogeneity of the population

The non-regulated component is not a homogeneous population. The mapping of migration procedures (Annex 9.3) shows that only two Member States require the full set of document types, that a further group requires an intermediate subset, and that in a substantial number of Member States no systematic assessment of qualifications is carried out, admission resting instead on proxies such as salary thresholds, labour-market tests, occupation lists, quotas or employer sponsorship. The population therefore spans a documentary-intensive segment, in which diplomas, transcripts, evidence of professional experience, legalisations and certified translations are all required, and a light-verification segment, in which only a limited confirmation of educational attainment is involved. These segments cannot be distinguished quantitatively from the available evidence. The per-procedure figure is therefore presented as an indicative average burden across a diverse set of procedures and should be interpreted as an approximation rather than a precise estimate for any single procedural pathway.

Cost drivers and per-procedure burden

The per-procedure burden is built up from its documentary components, drawing on the cost values already established in the framework and on how frequently each component is required across Member States, as recorded in the migration mapping. The documentary drivers identified are diplomas and transcripts (16 Member States), evidence of work experience (11 Member States), legalisation and apostilles (11 Member States) and a curriculum vitae or portfolio (9 Member States). Certified translation is treated as a supporting cost driver, corroborated by the broader evidence base, which records it as widely required across Member States; since its incidence cannot be read directly from the document-type mapping, it is tested in the sensitivity analysis below. An accompanying recognition statement applies only where a migration authority requires a prior statement from a third party such as an ENIC-NARIC centre, and indirect third-party fees apply only in the small number of Member States where they are charged by bodies other than the migration authority, in the order of EUR 115–150.

Weighting each component by its incidence across Member States yields an indicative average burden of the order of EUR 300 per procedure, reflecting the distribution of documentary requirements observed in the migration procedures mapping. This is substantially below the per-procedure baseline estimated for regulated professions (approximately EUR 1,400 to EUR 1,500), consistent with the lighter documentation requirements and the absence of a substantive assessment of the curriculum. The indicative range runs from approximately EUR 200 to EUR 700, the lower bound

corresponding to a light verification of educational attainment and the upper bound to the full documentary package, including certified translation, legalisation and an accompanying recognition statement.

The estimate is most sensitive to the certified-translation component, the one driver whose incidence is inferred rather than observed directly in the document-type mapping. It is nonetheless robust to this assumption: it remains within the same order of magnitude under alternative scenarios, standing at approximately EUR 245 per procedure where translations are assumed to be required no more frequently than diplomas, and approximately EUR 326 per procedure where they are assumed to be required in all Member States. The estimate of around EUR 300 therefore does not depend on a single assumption.

Processing time

No time-related effects are quantified for this component. The mapping records that statutory processing times for work-related residence permits generally fall within a range of six to twelve weeks, and that half of the migration authorities consulted reported the additional time attributable to qualification checks to be unknown. The time-saving assumptions applied to regulated professions are not extended here, since the link between a shorter procedure and earlier labour-market entry cannot be established for these checks; accordingly, no welfare, labour-market entry or opportunity-cost effects are attributed to this component.

Cost savings

The benefits attributed to this component are confined to administrative and documentary cost savings. The initiative reduces these costs by lowering the number of documents required, standardising the documents accepted and limiting the duplication of qualification evidence between the migration procedure and any subsequent recognition procedure — the last of these corresponding to the transferability gap documented at the migration–recognition interface. The savings are estimated by applying reduction rates to the compressible documentary and duplication component of the per-procedure burden. The rates applied are lower than those used for the regulated professions (4–8, 15–22 and 33–47 per cent for Policy Options 1, 2 and 3 respectively), reflecting the fact that the initiative acts here only on documentary and duplication costs, and not on a substantive assessment that could be simplified.

On this basis, the indicative annual administrative and documentary cost saving is of the order of EUR 0.5 million under Policy Option 1, EUR 1.8 million under Policy Option 2, and EUR 1.8 million under Policy Option 3.These figures are summarised in Table 8c in the main text. The savings are reported as ranges, without a central point value, in keeping with the indicative nature of the estimate and the heterogeneity of the underlying

population. They are reported separately from, and are substantially smaller than, the administrative savings estimated for regulated professions, and should be interpreted as a complementary component of the overall administrative burden analysis

Limitations

The model is subject to three limitations, stated explicitly. First, the volume is the difference between two estimates within the qualification-assessment pool and is reported as a range rather than as a measured quantity. Second, the residual population includes procedures that differ in the depth of qualification scrutiny, ranging from more documentary-intensive assessments to cases where admission relies primarily on labour-market or migration criteria; since these segments cannot be isolated quantitatively, the average burden is applied to the population as a whole, and the resulting figure should be read as an indicative approximation rather than as a precise measure of the burden specific to qualification-related checks. Third, the incidence of certified translations is inferred rather than observed directly in the document-type mapping, although the sensitivity analysis shows the estimate to be robust to this assumption. For these reasons the estimate is presented throughout as indicative and complementary, is reported separately from the regulated-profession results, and should not be read as directly comparable to the welfare-based estimates developed for regulated professions.

Table 16c – Main assumptions underlying the indicative burden estimate for migration-related qualification checks in non-regulated professions

Element	Treatment in the model
Population	Residual estimate of approximately 62,000–63,000 checks per year
Procedural scope	Migration-related qualification checks for non-regulated professions
Average burden per procedure	Approximately EUR 300
Uncertainty range	Approximately EUR 200–700 per procedure
Time-related effects	Not quantified
Welfare effects	Not quantified
Labour-market entry effects	Not quantified
Benefits quantified	Administrative and documentary cost savings only

Source: authors' elaboration based on the migration procedures mapping (Annex 9.3), the TCN and CA surveys and Eurostat migr_resocc.

Level 2 — Competent authority overhead costs

Beyond the variable costs at Level 1, competent authorities for the recognition of professional qualifications of third-country nationals incur fixed and semi-fixed annual costs (IT systems maintenance, legal and compliance staff time, recognition-related training, management overhead). These cost components are qualitatively captured in the CA survey through question 37 (effect of EU action on different cost categories), where no respondent selected "no change" on any of the four cost items (valid n=94–118); the modal expectation was a small decrease in full-time equivalents devoted to recognition procedures and a small increase in third-country cooperation and information exchange. The pattern is consistent with a policy option introducing standardisation that reduces variable per-case staff workload while increasing one-off implementation and ongoing cooperation costs.

These cost components do not enter per-procedure SCM calculations since they do not scale directly with procedure volumes, but are expected to be partially reduced under Policy Options 2 and 3 through economies of scale and shared infrastructure: the EU comparability database (A9) and harmonised documentation requirements (A5) reducing per-case verification effort, common procedural rules (A1), binding deadlines (A4) and fee structure rules (A7) reducing the case-by-case legal review effort, and the shared comparability database under measures A8 and A9 reducing the per-case verification effort. These savings are reflected in the multi-criteria decision analysis in Section 7.3 and, where estimable, as additional cost avoidance items under Policy Options 2 and 3.

The NARIC survey complements this picture for the ENIC-NARIC centres specifically. Question 37 of the NARIC survey records that overhead costs are concentrated on website maintenance and online guidance (88.9 per cent of respondents, n=16 of 18), assessment or verification activities (61.1 per cent, n=11) and workshop and information sessions (50.0 per cent, n=9), with smaller shares for printed materials, translation and interpretation. Both information provision and verification activities would be partially reduced under Policy Option 3 through the verifiable digital credentials criterion for third-country institutions (measure A12) and the EU-wide automatic recognition channel for the seven sectoral professions (measure A11).

IT implementation costs across policy options. IT implementation costs are analysed using a two-layer approach, distinguishing between costs incurred at EU level for the development of common digital infrastructure and costs incurred by Member States for the adaptation, integration and operation of national systems. The relative distribution of costs across the three policy options reflects the degree of centralisation and the binding nature of the implementation arrangements envisaged. The cost categories considered, summarised in the matrix below, are derived from the analytical framework adopted for the present study, adapted to the specificities of the third-country national recognition channel.

Table 22 - Implementation cost categories across policy options (EU-level and Member State-level).

Cost category	Baseline	Policy Option 1	Policy Option 2	Policy Option 3
EU-level costs				
EU comparability database (information exchange on third-country qualifications)	—	Information dissemination on existing tools (capacity building, peer learning)	Development of interoperable EU-level database supporting national CAs in information exchange on third-country recognition decisions (measure A9)	Same as PO2
EU authenticity check service for third-country qualifications	—	Voluntary assistance from EU-level network of focal points	EU-level service open to national CAs on demand (measure A8)	Same as PO2
Capacity building, training and EU-funded study visits	Existing peer learning programmes	Strengthened capacity building for national CAs (B1–B5)	Same as PO1, with training on measure A4 procedural deadlines	Same as PO2, with additional training on automatic recognition (A11)
Member State-level costs				
National recognition database interoperability with EU-level database	—	Marginal: voluntary participation in EU pilots	Significant: development of interoperability with EU-level database (A9)	Same as PO2
Coordination between recognition and migration authorities	—	Marginal: B-measure on coordination guidance only	Significant: A2 binding coordination requirements	Same as PO2, with additional operational coordination with sectoral automatic-recognition channel
Participation in EU governance and subgroups	—	Voluntary participation in subgroup on TCN recognition	Participation in subgroup (binding for transposition coordination)	Same as PO2

Source: authors' elaboration based on the analytical framework.

At EU level, development costs would be expected to be present under Policy Options 2 and 3, where the EU comparability database becomes a structural element of the recognition system. Based on benchmarking with comparable EU digital infrastructure initiatives — notably the Single Digital Gateway (Regulation 2018/1724) — these costs would be expected to fall within an indicative range of several million EUR to low tens of million EUR over the implementation period, with one-off investment concentrated in the first years and reduced recurring operational costs thereafter. Under Policy Option 3, the verifiable digital credentials criterion applies to third-country institutions seeking accreditation under the automatic-recognition route, not as an EU-level mandatory infrastructure investment; the incremental EU-level cost under PO3 relative to PO2 is therefore limited. The single available point estimate from the focus group DataForms is the EUR 250,000 reported by the Slovenian ENIC-NARIC centre as the indicative

investment needed to digitalise national processes and connect to EU-level recognition tools or platforms; the Belgian ENIC-NARIC centre (Flanders) explicitly stated that "it is currently not possible to estimate the exact capacity or resources required to technically integrate EU-level recognition tools

At Member State level, costs would be expected to remain limited under Policy Option 1, where participation in EU-level voluntary tools and capacity building entails marginal additional effort. Under Policy Option 2, costs would be expected to increase significantly, as each Member State would need to develop or upgrade its national recognition system to interoperate with the EU-level comparability database and to comply with the binding coordination requirements with migration authorities (measure A2). Under Policy Option 3, the incremental cost relative to Policy Option 2 would be limited to the operational coordination with the sectoral automatic-recognition channel; the centralisation of part of the infrastructure at EU level (notably the EU comparability database) would partially offset this incremental cost... Indicative ranges suggest costs in the order of EUR 200,000–EUR 500,000 per Member State, depending on the maturity of existing national systems and the integration requirements of each implementation pathway, in line with the benchmark-based IT cost matrix elaborated in the parallel Action 2 work

These estimates are indicative and based on benchmarking of comparable EU digital systems. They provide an order-of-magnitude assessment rather than precise cost projections and should be interpreted with caution given differences in implementation design and national starting conditions, the limited primary evidence available on the Member State side (only one of nine FG4 DataForms provided a numerical estimate) and the structural heterogeneity of national recognition systems mapped in the MPF Mapping 2024 horizontal report. The robustness level of the IT implementation cost estimate is therefore low.

Third-country cooperation costs across policy options. A cost dimension specific to the recognition of third-country qualifications, with no direct analogue in the recognition of qualifications of EU and EEA citizens under the Professional Qualifications Directive, is the cost of cooperation with authorities and educational institutions in third countries. The dimension is supported by primary evidence from the NARIC survey, where 88.9 per cent of respondents (n=16 of 18) identified cooperation with third-country authorities as occasional (50.0 per cent) or regular (38.9 per cent), and only 11.1 per cent (n=2) reported no cooperation. The main challenges identified by ENIC-NARIC centres in cooperating with third countries are lack of reliable information on foreign institutions and programmes (88.9 per cent), document authenticity and fraud concerns (88.9 per cent), long verification times (77.8 per cent), missing or incomplete documentation (66.7 per cent) and limited staff or financial resources (50.0 per cent). The pattern is corroborated by question 31 of the CA survey, where cooperation with awarding institutions in third countries is reported by 18.9 per cent of respondents, with professional regulators in third countries by 23.2 per

cent and with public authorities in third countries by 30.0 per cent — systematically lower than the intra-EU cooperation rates (over 40 per cent on the corresponding intra-EU items).

Under Policy Option 1, third-country cooperation activities are strengthened through the soft-law measures B1 (structured mutual-learning programmes and comparative studies on recognition and validation practices), B13 (information exchange on third-country qualifications with relevant EU groups) and B14 (support for ETF work on the quality assurance of third-country qualifications). The cost impact is concentrated on national competent authorities and ENIC-NARIC centres dedicating staff time to participation in EU-level peer learning activities, with limited incremental cost relative to the baseline. Under Policy Option 2, the EU comparability database (measure A6) and the EU authenticity check service (measure A8) introduce structural cost reductions through the mutualisation of verification activities at EU level, while binding cooperation requirements with third-country authorities under measures A8 (EU authenticity check service) and A9 (EU comparability database) impose a one-off integration cost on national systems. Under Policy Option 3, the introduction of the automatic recognition channel for the seven sectoral professions (measure A11) and the integration with digital credentials (measure A12) further reduce the per-procedure cooperation cost while increasing the one-off integration cost.

The MPF Mapping 2024 (ECDPM, September 2024) provides the qualitative anchor for the third-country cooperation cost dimension. The horizontal report maps existing bilateral agreements between EU Member States and third countries on the mutual recognition of qualifications, with substantial heterogeneity across Member States: Spain reports bilateral agreements with Colombia, Argentina, Chile and China for university degrees; France maintains agreements concluded under the cooperation framework with francophone Africa; Hungary refers to Act C of 2001 and the Lisbon Convention; Ireland does not generally use bilateral qualification-recognition agreements but relies on the multilateral framework. The heterogeneity of the bilateral agreement landscape is one of the main drivers of cross-Member State variability in third-country cooperation costs and supports the calibration of measure A9 (EU comparability database) and measure A8 (EU authenticity check service) under Policy Options 2 and 3 as cost-saving instruments through the mutualisation of verification effort at EU level.

The quantification of the third-country cooperation cost dimension is constrained by the absence of structured numerical estimates in the focus group DataForms and by the heterogeneity of the underlying activities (bilateral agreements, ad hoc verification requests, participation in international networks). The dimension is therefore quantified at order-of-magnitude level: under the central scenario, the per-procedure cost saving on the third-country cooperation component is estimated at EUR 50–EUR 150 per case for the procedures involving authentication or verification of third-country credentials, applied

to approximately 60 per cent of total procedures (the share of procedures requiring third-country document verification, in line with question 13 of the CA survey on legalisation/apostille requirements). The robustness level of the third-country cooperation cost estimate is low given the limited primary evidence.

Level 3 — Social cost and opportunity cost

Unlike the Level 1 SCM-based estimates, Level 3 captures the broader welfare implications associated with delayed labour market utilisation of recognised qualifications. Level 3 introduces a welfare-side estimation of the social and opportunity cost dimension associated with the recognition procedure. The dimension is analytically distinct from the direct administrative savings quantified at Level 1: while Level 1 measures the reduction in observable procedural cost components borne by applicants and competent authorities (fees, translation, notarisation, CA-side variable cost), Level 3 measures the welfare value of the time during which qualified third-country nationals are unable to practise at the qualification-matched level due to the duration of the recognition procedure. The two dimensions capture analytically distinct aspects of the same procedural friction and are therefore reported separately throughout the analysis to preserve interpretive clarity and avoid double-counting in the comparative summary.

The recognition procedure imposes a significant opportunity cost on third-country national applicants who are unable to practise during the period in which their qualifications are under assessment. Survey evidence from the dedicated TCN survey indicates that 49.3 per cent of respondents reported working below their qualification level during the recognition procedure (n=152, question 15, including the “not applicable” category), or 55.1 per cent when the calculation is restricted to the n=136 respondents who had effectively undergone the procedure. A further 16.4 per cent of respondents reported not working at all during the procedure. The combined share of respondents who were either not working or working below their qualification level during the procedure is therefore approximately 65 per cent, consistent with the higher exposure of TCN applicants to procedural barriers compared to EU nationals.

For the welfare-side analysis, the relevant counterfactual is not the median observed procedural duration but the reduction in processing timelines expected from the measures under each policy option. The empirical baseline is the mean processing time of 14.2[198] months recorded by question 13 of the dedicated TCN survey pooled with the Public Consultation TCN sub-sample (n=182, excluding 15.4 per cent “don’t know / don’t remember”, calculated using bin midpoints of 0.5/2/4.5/9/18/30/42 months). The median bin is 6–12 months (midpoint 9 months), and the inter-quartile range spans approximately 3–18 months. Under the package of measures envisaged: Policy Option 1 introduces no

[198] The TCN-reported figure is used in place of the CA self-reported timelines (cited in the problem driver section) because the latter systematically under-state the duration experienced by applicants.

binding deadline but raises the visibility and predictability of timelines through the soft-law measures B7 (best-practice guidelines on procedural timelines) and B6 (information dissemination on existing deadlines), with an indicative time gain of approximately 10 per cent of the actual baseline (≈1.4 months); Policy Option 2 introduces binding deadlines through measure A4 (3–4 months for general system procedures from receipt of complete dossier), reducing the median processing time from 14.2 months to approximately 5 months on the central scenario, with a time gain of approximately 9 months; Policy Option 3 introduces the automatic recognition channel for the seven sectoral professions (measure A11), reducing the processing time for sectoral procedures from 14.2 months to approximately 4 months (range 3–5 months), aligned with the automatic-recognition deadline under the current Directive 2005/36/EC framework and not assuming any mirroring of the digitalisation-driven one-month deadline discussed for the intra-EU Action 2 work, with a time gain of approximately 10.2 months for the sectoral subgroup, while the general system procedures retain the 5-month deadline introduced under Policy Option 2. This approach supports consistency between policy design and impact quantification.

The opportunity cost analysis is segmented accordingly between the two procedural groups. The sectoral group encompasses the seven professions covered by automatic recognition under Title III, Chapter III of Directive 2005/36/EC — Doctor of Medicine, nurse responsible for general care, dental practitioner, midwife, pharmacist, veterinary surgeon and architect. The pooled sectoral concentration of TCN procedures, derived from question 5 of the TCN survey + PC sub-sample (n=250), is 31.6 per cent for the healthcare cluster (28.8 per cent dedicated TCN survey + 2.8 per cent Public Consultation “Health”), with additional sectoral concentration in education or teaching (6.0 per cent), legal profession (3.6 per cent) and engineering or architecture (3.2 per cent). For the framework, the sectoral share is set at 40 per cent of the TCN procedure flow (range 30–50 per cent), reflecting the seven sectoral professions.

The monthly opportunity cost is approximated using occupational wage proxies from the Eurostat Structure of Earnings Survey 2022, EU-27 aggregate (the Eurostat statistic is published at EU-27 level and is used here as a proxy; the study perimeter is EU-26, Denmark being outside the study, and all references to the study perimeter elsewhere should read EU-26), mean annual gross earnings, enterprises with 10 or more employees: EUR 51,477 per year (approximately EUR 4,290 per month) for ISCO-08 occupational group 2 (Professionals), used as the wage proxy for both the sectoral subgroup (nurses and medical doctors fall within ISCO 22 Health professionals, which is part of ISCO group 2) and the non-sectoral subgroup (engineers fall within ISCO 21 Science and engineering professionals, also within ISCO group 2). For the framework, the central monthly wage proxy is set at EUR 4,300 per month for both subgroups, with a sensitivity range of EUR 3,500–EUR 5,000 per month reflecting the gross-of-tax earnings differential across Member States and across specific professions within each ISCO group.

The EU-wide ISCO-08 Professionals wage proxy of approximately EUR 51,000 per year represents the productive value of a qualifications-matched third-country national once recognition has been obtained; it is therefore the appropriate anchor for the forgone-productivity interpretation of the welfare gain, but it is an upper bound and is reported as such. The dedicated TCN survey separately documents an observed annual income of approximately EUR 26,640 during the procedure (Q17), which represents actual earnings during the waiting period; the gap between the two values is consistent with the 49.3 per cent of respondents working below their qualification level during the procedure (Q15). To reflect the typically lower earnings of third-country nationals during the recognition waiting period, a conservative sensitivity scenario is added in which the welfare-gain anchor is the differential between the EU-wide proxy and the observed TCN income (approximately EUR 24,360 per year), representing the lower-bound estimate of forgone earnings strictly attributable to under-qualification. Under this conservative anchor the Level 3 welfare gain is reduced by approximately one third to forty-five per cent across all policy options (for example, the Policy Option 3 empirical estimate moves from the order of magnitude of EUR 300 million to the order of magnitude of EUR 110–130 million per year). The comparative ranking of the three policy options is unchanged under either anchor; the EU-wide proxy is retained as the central case with the explicit caveat that it represents an upper bound.

The welfare gain associated with each policy option is estimated by distinguishing the two groups of applicants who bear an opportunity cost during the procedure, since the nature of that cost differs between them. The two groups are identified from a single survey question asking respondents whether, while going through the recognition process or awaiting its completion, they were working in a job below their qualification level (dedicated TCN survey, question 15, n=152). For the 49.3 per cent who reported working below their qualification level, the relevant loss is the differential between the earnings obtained in under-qualified employment and those that would be commanded once recognised; this differential is captured by applying a calibration factor of 0.186 to the EUR 4,300 monthly wage proxy, yielding an opportunity cost in the order of EUR 800 per month. For the 16.4 per cent who reported not working at all during that period (same question), the relevant loss is the full monthly wage proxy of EUR 4,300, as no earnings are obtained in the interim. Each group is further weighted by the share expected to take up qualification-matched employment following recognition — 0.75 for those already in under-qualified work and 0.50 for those previously not working, reflecting that recognition does not translate immediately or uniformly into employment at the appropriate level — and by a realisation factor reflecting the expected degree of effective implementation under each policy option (60 per cent under Policy Option 1, 75 per cent under Policy Option 2, and 85 per cent for the automatic-recognition subgroup under Policy Option 3, with 95 per cent reported as an upper-bound sensitivity). The two components are estimated separately and summed. For the baseline of 62,500 TCN recognition procedures per year (Annex 4.6), the estimated annual reduction in applicant-side forgone

wages is in the order of magnitude of EUR **34** million per year under Policy Option 1, EUR **280** million per year under Policy Option 2, and EUR **308** million per year under Policy Option 3.

To capture the broader value to the economy as a whole, the analysis is extended to a GDP-equivalent measure by applying sector-specific multipliers derived from EU-27 2022 productivity data (Gross Value Added per worker, Eurostat nama_10_a64 and nama_10_a64_e): multipliers in the order of 1.10–1.25 are applied to the sectoral subgroup, reflecting productivity in the human health and social work sector (NACE Q), and 1.40–1.70 to the non-sectoral subgroup, reflecting the average productivity of professional, scientific and technical activities (NACE M). On this broader measure, which reflects the broader economic value associated with labour productivity, the estimated annual GDP-equivalent gain is in the order of magnitude of EUR 47 million per year under Policy Option 1, EUR 380 million per year under Policy Option 2, and EUR 417 million per year under Policy Option 3.

Two interpretive remarks frame the reading of these estimates. First, the GDP-equivalent estimates should not be interpreted as direct additions to GDP, but rather as indicative proxies of the broader economic value associated with the faster labour market utilisation of recognised qualifications. Their function is to provide a macro-level scaling of the welfare gain through a productivity lens, not to forecast the precise contribution of the recognition reform to national accounts aggregates. Second, the welfare gain Level 3 and the GDP-equivalent measure should not be summed in the comparative summary: the latter is a macro reinterpretation of the same underlying time-saving effect through a productivity multiplier, not an additional benefit accruing on top of the welfare gain. The two measures are therefore reported as alternative scaling of the same underlying welfare effect, and the aggregate impact estimate presented in Section 7.2 incorporates only the welfare gain Level 3, not the GDP-equivalent measure, to avoid the double-amplification effect.

These estimates are indicative in nature and are presented as orders of magnitude. They provide a policy-relevant assessment of welfare gains, directly linked to the expected effects of the policy options and their implementation. They are sensitive to assumptions on procedural segmentation, wage proxies, inactivity rates and realisation factors. The welfare gain Level 3 is not included in the SCM baseline and is presented separately as a welfare effect: it is analytically distinct from the administrative cost savings quantified at Level 1 and is therefore reported separately rather than integrated into the SCM baseline, in order to preserve comparability of the SCM core estimates across policy options and avoid double-counting in the comparative summary.

Level 4 — Qualitative and non-quantifiable dimensions

Several dimensions of material significance for the assessment of the recognition system for third-country national qualifications cannot be quantified within the SCM framework but are substantiated by primary and secondary evidence and are reflected in the multi-criteria decision analysis assessment in Section 7.3.

The deterrence effect — the share of qualified third-country nationals who do not initiate recognition procedures due to perceived complexity, cost or duration of the process — is documented through three converging sources. First, question 12 of the dedicated TCN survey + Public Consultation sub-sample (pooled n=182) records that 11.5 per cent of respondents withdrew their application “because the process was too costly, long or complex”, providing the empirical lower bound of the deterrence parameter. Second, the latent intent rate analysis documented in Annex 4.6 yields a pooled estimate of 39.8 per cent of respondents who did not undertake the recognition procedure but would have considered it under simplified procedural conditions, with a scenario range of 30–56 per cent across the dedicated TCN survey (29.9 per cent) and the retrofitted Public Consultation TCN sub-sample (55.8 per cent). Third, EMN-OECD (2025) and ECA Special Report 10/2024 corroborate the structural relevance of the deterrence dimension across the EU recognition system, with documented evidence of qualified third-country nationals foregoing labour market entry at the qualification-matched level due to procedural barriers.

The brain waste effect — the share of qualified third-country nationals working in roles below their qualification level due to the absence or partial outcome of the recognition procedure — is documented by question 15 of the dedicated TCN survey: 49.3 per cent of respondents (n=152) reported working below their qualification level during the recognition procedure. The share is corroborated by the Eurostat lfsa_eoqgan dataset on over-qualification rates, where the gap between non-EU citizens (39.8 per cent in 2023, rising to 41.4 per cent in 2025) and EU nationals (20.8 per cent in 2023) reaches approximately 19 percentage points in the EU-27 aggregate[199], with substantial heterogeneity across Member States and across sectors. The qualitative evidence from focus group FG6 (individual TCNs) confirms the structural nature of the brain waste dimension, with documented case studies of qualified TCNs working in lower-skilled occupations during and after the recognition procedure (for example, a Kenyan-trained engineer working as an electrician in the Netherlands, documented in the FG6 minutes).

The attractiveness dimension — the potential additional attractiveness of the EU labour market for qualified third-country nationals driven by improved recognition procedures — is documented qualitatively in EMN-OECD (2025) on labour migration in times of labour

[199] Eurostat aggregates are reported as EU-27 in the source; analytical estimates in this study are read as EU-26 (Denmark excluded from the study perimeter, with an opt-out from parts of the preferred policy option).

shortages, in the Mobility Partnership Facility country reports (notably the horizontal report and the country reports on Germany, France, Italy, Spain, Netherlands and Sweden) and in the public consultation responses from the employer/business/CSO/PA sub-sample (n=118), where 70 per cent of respondents identified faster and more transparent recognition procedures as a structural factor in the attraction of qualified third-country professionals. The attractiveness dimension is not quantified within the SCM framework but is reflected in the qualitative assessment of Policy Options 2 and 3.

These dimensions are not amenable to monetisation within the SCM framework but are incorporated in the multi-criteria decision analysis scoring (Section 7.3) to ensure that non-monetisable impacts are systematically reflected in the comparative assessment of policy options. The qualitative evidence is consistently anchored on the primary sources documented in this annex and on the secondary literature reviewed in the Mapping report and in the EMN documents accompanying the present study.

Per-procedure cost reductions: mechanism and calibration

The savings achievable under each policy option are estimated as percentage reductions in the baseline per-procedure burden of EUR 1,500 (central scenario, range EUR 630–EUR 2,450), applied to the single baseline population of approximately 62,500 procedures per year — the procedures taking place in the absence of EU action (Annex 4.6) — and discounted by a realisation factor reflecting expected implementation effectiveness. The savings ranges are calibrated on the basis of: specific administrative bottlenecks documented in question 28 of the CA survey — in particular, document authenticity verification (60.0 per cent of respondents), incomplete or non-transparent documents (63.7 per cent), language barriers (53.7 per cent) and lack of information about awarding bodies in third countries (60.5 per cent) — and the extent to which each policy option directly addresses them; question 24 of the MA survey on the stages where challenges most occur in the migration-recognition coordination, with document completeness and authenticity at 77.1 per cent of respondents (n=37 of 48); the focus group polls (FG1, FG2, FG3, FG4, FG5) on the expected effects of each policy measure on the per-procedure burden; and the secondary literature on cost reduction potential through digital credentials (Scholz and Rohr, on EU mobility costs) and harmonised documentation requirements (EMN AHQ 2024.50 on fees for residence permits).

The savings ranges are triangulated across survey evidence, focus group polls, stakeholder consultations and documented administrative bottlenecks, and should be interpreted as informed and calibrated estimates grounded in the full body of primary and secondary evidence assembled for this study. The gross savings ranges adopted in the framework are 4–8 per cent of the per-procedure baseline under Policy Option 1, 15–22 per cent under Policy Option 2 and 33–47 per cent under Policy Option 3, with the difference between the three reflecting the difference in the type and intensity of

measures: Policy Option 1 relies on soft-law measures whose effects are constrained by national transposition discretion; Policy Option 2 introduces binding common rules on procedural simplification, fee structure, deadlines, and coordination with migration authorities, with the expected savings concentrated on the procedural and documentation components; Policy Option 3 adds the automatic recognition channel for the seven sectoral professions and the digital credentials infrastructure, with the additional savings concentrated on the verification and translation components for the sectoral subgroup.

Realisation factors reflect the expected degree of implementation effectiveness under each policy option. Under Policy Option 1, a realisation factor of 60 per cent is applied (40 per cent discount), reflecting the soft-law character of the measures and the empirical evidence on the partial uptake of voluntary EU instruments in the recognition area, in line with the Better Regulation methodology. Under Policy Option 2, a realisation factor of 75 per cent is applied (25 per cent discount), reflecting the binding but transposition-discretionary character of the measures, consistent with EU impact assessment precedents for partial harmonisation directives and with the Better Regulation Guidelines on the assessment of binding instruments. Under Policy Option 3, a realisation factor of 85 per cent is applied (15 per cent discount). Policy Option 3 is identical to Policy Option 2 except for the automatic-recognition component, which applies only to the sectoral subgroup and only progressively and selectively; the ten-percentage-point differential over Policy Option 2 reflects exclusively that incremental, self-executing component and not a higher compliance assumption on the shared components or an assumption that statutory deadlines are easier to meet under Policy Option 3. The 95 per cent value is retained as an upper-bound sensitivity only. These rates are informed calibration assumptions rather than empirically observed implementation coefficients, and they are subjected to sensitivity testing in the relevant section of this report.

The calibration is methodologically distinct from the activation rate dimension, which is documented in Annex 4.6: the realisation factor applies to the share of existing procedures where the per-procedure cost saving materialises, while the activation rate applies to the share of the latent demand pool that initiates an additional procedure under each policy option, generating additional volumes that may produce additional welfare gains and fiscal effects, but not per-procedure cost savings on existing procedures. The two parameters are therefore complementary and not double-counted: the per-procedure cost reductions are calculated on the existing procedure population (approximately 62,500 procedures per year, central value of a 40,000–85,000 interval) discounted by the realisation factor, while the welfare gain and the tax revenue from additional procedures are calculated on the incremental volumes generated by the activation of the latent demand pool.

Central estimates throughout this section are derived as midpoints of the reported scenario ranges — that is, (minimum + maximum) / 2 — and used consistently for aggregation across all three policy options. The aggregate annual administrative savings

on the per-procedure dimension are therefore in the order of magnitude of EUR 2.2–EUR 4.5 million per year under Policy Option 1, EUR 10.6–EUR 15.4 million per year under Policy Option 2 and EUR 16.8–EUR 24.3 million per year under Policy Option 3, on the baseline of approximately 62,500 procedures per year. The sensitivity of these figures to a prudential lower-bound reading of the procedure population is reported in the sensitivity analysis.

The figures above are annual steady-state values. To express the full stream of impacts, the annual administrative savings are also reported as a present value over an assessment period 2029-2040, discounted at 3 per cent in line with the Better Regulation methodology (Tool #64). On the baseline of approximately 62,500 procedures per year, the present value of the administrative savings is in the order of EUR 29 million under Policy Option 1, EUR 122 million under Policy Option 2 and EUR 192.3 million under Policy Option 3 (cumulative discount factor 9.38). The assessment period runs from the expected entry into application of the measures. For Policy Option 3, the realised annual value over the assessment period is expected to be below the steady-state value because of the progressive accreditation of third-country institutions under the automatic-recognition route; the steady-state values are reported as the reference.

Annex 4.2 Methodology for the estimation and projection of the volume of TCN recognition applications in the EU

This annex documents the methodology applied to estimate the current annual volume of recognition applications submitted by third-country nationals (TCNs) in the EU and to project its evolution under the baseline scenario and the three policy options. The methodology is anchored on the empirical evidence collected during the present study (a survey of competent authorities, a survey of migration authorities, a survey of ENIC-NARIC centres, a Public Consultation, a dedicated TCN survey, and seven focus groups), on the macro statistics published by Eurostat and by the EU Regulated Professions Database (RegProf), and on the EMN Ad-Hoc Queries directly relevant to the analysis. Each parameter used in the framework is anchored on a specific source.

The annex is organised in six sections. Section 1 presents the estimation of the current annual volume. Section 2 discusses the relationship with the RegProf benchmark for establishment procedures. Section 3 documents the baseline assumption. Section 4 documents the projection methodology under the three policy options. Section 5 reports caveats and sensitivity dimensions. Section 6 provides the source-by-source traceability of each parameter.

Estimation of the current annual volume

The baseline caseload to which the initiative applies is estimated in two steps. To determine the annual volume of first residence permits that involve an element of qualification assessment, the most recent available Eurostat data was used. The total volume was calculated by summing the number of first residence permits for employment reasons under the Blue Card regime, the national highly skilled migration pathways and the researchers' visa.[200] This yields a total of approximately 125,000 first residence permits issued per year for skilled workers which imply some element of qualification assessment. This is a conservative estimate of the actual application workload as it represents issued permits, not counting visa applications that are rejected during the vetting process.

Since migration databases do not record the regulatory status of the job the first residence permit applies to, the share of first residence permit applications pertaining to regulated professions was estimated triangulating five independent pieces of evidence: i) a bottom-up estimate from the survey of competent authorities[201]; ii) two top-down anchors in the form of a) a 2024 EMN Ad Hoc Query providing administrative data on medical doctor recognition[202] and b) a study German Federal Institute for Vocational Education and Training reporting statistical data on the case load of recognition procedures initiated by third-country nationals[203]; iii) a small-scale study by the IOM on the conditions of entry and

[200] Eurostat dataset: [migr_resocc] First permits issued for remunerated activities by reason, length of validity and citizenship. In 2024, 36,000 third-country nationals obtained an EU Blue Card, approximately 70,000 were granted a permit as highly skilled workers under specific national migration pathways and another 23,000 as researchers. The remaining 986,000 were issued a permit for other employment-related reasons (incl. seasonal workers).

[201] The competent-authorities survey yields a bottom-up estimate of approximately 74,000 applications per year (central value; range approximately 55,000–111,000). Sitting in the upper part of the convergence interval, it is balanced against the more conservative anchors, supporting the prudence of the 62,500 central estimate.

[202] EMN Ad-Hoc Query 2024.16, *"Recognition of third-country qualifications for the profession of doctor with basic medical training"*. The query responses reflect the variety of applicable recognition systems in the MS and the data limitations of the national systems. Some MS did not provide any quantified estimates; in other cases, precise numbers for recognition applications for medical doctors were provided whereas still others provided broader estimates of the number of applications covering all regulated professions. Based on the reported data for 10 MS provided precise numbers (BE, BG, CY, CZ, DE, EE, ES, FR, NL, SI), the amount of TCNs applying for recognition to become a medical doctor in 2023 equalled 46,365. This figure provides an empirical anchor for the upper bounds of the model. Given that it represents the case load in a single MS, it validates that the overall volume of applications for regulated professions across all 27 Member States sits comfortably above this floor, supporting the credibility of the central estimate of 62,500 annual applications.

[203] Böse, C., Schmitz, N., & Zorner, J. (2025), "Auswertung der amtlichen Statistik zum Anerkennungsgesetz des Bundes für 2024", Bundesinstitut für Berufsbildung (BIBB). Official federal tracking data indicates that Germany experienced a historic high caseload of approximately 71,000 new recognition applications in

residence of third-country high-skilled workers in AT[204] and iv) a focus group cross-check based on the data forms returned by the Member State authorities.[205] The five sources yield a **convergence interval of between 40,000 to 85,000 applications for regulated professions per year, with a central estimate of 62,500 applications annually**.

The volume of recognition procedures taking place in the absence of EU action — the baseline — is estimated at approximately 62,500 per year, the central value of a 40,000–85,000 interval triangulated from five independent channels (competent-authorities survey, EMN Ad-Hoc Query 2024.16, BIBB official statistics, Eurostat migr_resocc, focus-group data forms). This single figure is the baseline used for the administrative cost-savings quantification and for the baseline welfare estimates. It is the only baseline used for the calculation of administrative cost savings.

Alongside the baseline, the analysis reports a deterrence-adjusted reading of approximately 35,000 procedures per year (interval 20,000–50,000, bounded above by the long-term RegProf benchmark of 52,929 establishment procedures per year, mean 2020–2024). This figure is not a second baseline and is not used for the calculation of administrative cost savings: it represents the share of demand currently activated once the structural deterrence effects are taken into account (regulatory asymmetry between the Professional Qualifications Directive and the heterogeneous national rules applicable to third-country nationals; the self-declared deterrence acknowledged in Commission Recommendation (EU) 2023/2611; the over-qualification gap of approximately 19 percentage points recorded by Eurostat lfsa_eoqgan). Its analytical role is to provide an

2024 (representing a 14% year-on-year increase). The data indicates that TCNs drive the overwhelming volume of this workload, accounting for 88% of all recorded qualification assessments (approximately 48,500 applications) compared to just 12% stemming from EU/EEA/Swiss qualifications. This figure provides a second empirical anchor for the upper bounds of the model. Given that this total represents a single profession (medical doctors) across only ten responding Member States, it validates that the overall volume of applications for regulated professions across all 27 Member States sits comfortably above this floor, supporting the credibility of the central estimate of 62,500 annual applications.

[204] European Migration Network (EMN) / International Organization for Migration (IOM), Small-Scale Study III: *"Conditions of Entry and Residence of Third Country Highly-Skilled Workers"* - National Reports for Austria. This report allows for the cross-tabulation of national occupational data into structural professional groups. For the purpose of this exercise, it is assumed that professions such as physicians, nurses, pharmacists, teaching professionals, architects, civil/structural engineers, and legal professions are regulated, whereas IT professionals, business/marketing specialists, artists, and writers are not. Based on the underlying data profiles, it is estimated that the share of high-skilled third-country nationals working in a regulated profession is approximately 32% in AT. If this regional distribution serves as a proportional proxy for newly incoming TCNs for the EU as a whole, it yields an estimated lower-bound tier of 40,000 first permit issuances (125,000 x 32%) which pertain directly to a regulated profession. This 40,000 baseline is utilized here as the conservative lower floor.

[205] The focus-group data forms returned by Member State authorities provide a qualitative cross-check on the order of magnitude of the estimate, broadly consistent with the central value of approximately 62,500 annual applications derived from the other channels.

anchor for the potential activation of currently dissuaded third-country nationals once procedural barriers are reduced — a benefit-side effect, not a cost-saving — reported as such in Annex 4.5 and Section 7.2.

Relationship with the RegProf benchmark

The empirical estimate of approximately 62,500 TCN recognition applications for regulated professions per year exceeds the long-term average of approximately 53,000 establishment procedures per year recorded under the Professional Qualifications Directive for EU citizens (RegProf, mean 2020–2024 equal to 52,929). The relationship is methodologically coherent on the basis of three considerations integrated into the architecture of the present framework.

First, the two flows refer to structurally distinct populations and operate under different regulatory regimes. The Action 2 flow records establishment procedures submitted by EU citizens exercising the freedom of establishment under the Professional Qualifications Directive on the basis of qualifications obtained in another EU Member State. The Action 3 estimate records recognition applications submitted by TCNs holding qualifications obtained outside the EU under heterogeneous national rules. The two populations do not overlap, and the two flows are additive, not competing measures of the same phenomenon.

Second, the underlying populations differ markedly in size. The Action 3 estimate draws from a population of TCNs entering the EU for employment-related reasons that Eurostat (migr_resfirst) records at 1,115,986 first residence permits in 2024 alone, substantially larger than the EU intra-professional mobility population from which the Action 2 flow draws. Therefore, the absolute volume of TCN recognition applications for regulated professions can plausibly equal or exceed the absolute volume of EU citizen applications under the Professional Qualifications Directive.

Third, the TCN flow is strongly concentrated in healthcare and shortage occupations. The EMN Ad-Hoc Query 2024.16 records 46,365 medical doctor recognition applications in 2023 across 10 responding Member States, a single-profession value of the same order of magnitude as the entire annual intra-EU establishment flow recorded under the Professional Qualifications Directive across all regulated professions (RegProf benchmark, mean 2020–2024). The dedicated TCN survey (n=154) confirms this pattern, with 46.8 per cent of respondents declaring a regulated profession in healthcare. The high concentration is itself an empirical pattern that supports the order of magnitude of the empirical estimate.

The deterrence-adjusted reading of approximately 35,000 applications per year, bounded above by the RegProf benchmark by construction, provides a complementary perspective that respects the policy rationale of the initiative without imposing a constraint on the

empirical evidence. It is not used as a baseline for the administrative cost-savings quantification.

Projection under the baseline scenario

Under the baseline scenario, the volume is held constant at the central value of approximately 62,500 procedures per year. The constant baseline assumption is applied throughout the quantification.

Two qualifications apply. First, the survey of competent authorities (Q29, n=181 valid responses) records that 56.9 per cent of competent authorities expect the challenges associated with TCN qualification recognition to grow over the next 5–10 years. Second, the macro drivers (EU working-age decline of approximately 27 million projected over three decades, 85 per cent of EU occupations affected by labour shortages in 2023) point to structural pressure for growth. These elements are documented as a sensitivity dimension on the upper bound (Section 6), not adopted in the central case. The behavioural withdrawal rate of 10.5 per cent recorded in the dedicated TCN survey (16 of 152 respondents who reported an outcome) provides an empirical anchor for the level of deterrence under the baseline.

Projection under the three policy options

Architecture. The projection is constructed around two convergent reasonings. The first is the latent demand pool approach: the empirical evidence on the share of TCN respondents declaring an intention to apply for recognition without having yet done so defines a potential pool of activations under improved procedural conditions. The pool is documented at 29.9 per cent in the dedicated TCN survey (n=154), at 55.8 per cent in the corresponding Public Consultation sub-sample (n=95), and at 39.8 per cent in the pooled dataset (n=249); the central reference is the pooled value, with a scenario range of 30 to 56 per cent. The second is the sectoral concentration approach: 40 to 47 per cent of TCNs seeking recognition is concentrated in the seven sectoral professions covered by Directive 2005/36/EC (medical doctors, nurses, dentists, pharmacists, midwives, veterinary surgeons, architects) where Policy Option 3 introduces a structural change. The two reasonings are applied jointly to define the activation rates.

The latent intent rate reflects what respondents say they intend to do, not what they actually do. Since people's stated intentions tend to over-state their actual behaviour, the framework prudently sets activation rates well below 100 per cent of the latent pool, increasing across the three policy options in line with their growing legal stringency.

Activation rates and volume increments

Policy option	Activation rate of the latent pool	Anchor
PO1 — Soft-law	5–10 per cent	Voluntary measures, information-only effect; calibrated against the intention-behaviour gap
PO2 — Common rules	15–25 per cent	Binding rules with transposition discretion; FG4 records 88 per cent of respondents (n=11) expecting very positive impact from binding common framework
PO3 — + Automatic recognition	30–50 per cent	Mandatory and self-executing for the seven sectoral professions; FG7 records 69 per cent of respondents (n=16) expecting positive impact; PO2 rate retained for non-sectoral

The volume increments resulting from the calibration are reported below as orders of magnitude:

Policy option	Increment vs baseline (62,500)
PO1	+1,000 to +3,000 / year
PO2	+3,000 to +7,000 / year
PO3	+8,000 to +13,000 / year

The order of the increments is consistent with the qualitative rating adopted in the assessment of the policy options (rate +1 for PO1, +2 for PO2, +3 for PO3). The upper bounds are bounded by the qualitative ceiling represented by the absorptive capacity of national recognition systems (documented in the focus group on quality assurance and in the EMN Ad-Hoc Query 2024.16 data on the Spanish backlog of 12,779 pending medical doctor applications), reported as a caveat in Section 6 rather than as a quantified ceiling.

Caveats and sensitivity dimensions

The constant baseline is adopted in line with the Better Regulation methodology. Under a 3 to 4 per cent annual growth rate (consistent with the survey expectations and with the macro drivers), the baseline would reach 75,000 to 80,000 by 2030. These growth scenarios are documented as sensitivity and not adopted in the central case.

The dedicated TCN survey over-represents respondents from Ukraine (35.7 per cent), healthcare professions (46.8 per cent) and three Member States of recognition (Ireland,

Netherlands and France, jointly 60 per cent). The pooling with the Public Consultation sub-sample assumes negligible double counting between the two surveys, plausible on temporal and channel grounds (Public Consultation: 5 December 2025–27 February 2026; dedicated TCN survey: March–April 2026) but not directly verified. The latent intent rate is therefore treated as a scenario range rather than a point estimate.

Two parameters are not directly observed and are retained as qualitative directional indications only: the elasticity of TCN application volume to changes in procedural costs (no causal estimation available) and the absorptive capacity of national systems under increased volumes. Both are reported as caveats on the upper bounds.

Source traceability

Parameter / claim	Source	Detail
Empirical baseline: 62,500	Triangulation of five channels	Convergence interval 40,000–85,000
Deterrence-adjusted reading: 35,000	Triangulation adjusted for deterrence	Range 20,000–50,000; bounded by RegProf
RegProf benchmark: 52,929/year	RegProf, Statistics on Establishment	Mean 2020–2024
Constant baseline assumption	Better Regulation methodology	Constant-flow assumption applied throughout
Latent intent rate: 29.9 per cent	Dedicated TCN survey (n=154)	100 done + 46 plan + 8 no plan
Latent intent rate: 55.8 per cent	Public Consultation TCN sub-sample (n=95)	31 done + 53 plan + 11 no plan
Latent intent rate: 39.8 per cent (pooled)	Pooled dataset (n=249)	Scenario range 30–56
Behavioural withdrawal rate: 10.5 per cent	Dedicated TCN survey (n=152 with outcome)	16 of 152 withdrew due to cost/length/complexity
Inactivity during waiting: 49.3 per cent	Dedicated TCN survey (n=152)	75 of 152 working below qualification (Q15)
Sectoral concentration: 40–47 per cent	EMN AHQ 2024.16; dedicated TCN survey	46,365 medical doctors in 10 MS; 46.8 per cent healthcare in TCN survey
Spanish backlog: 12,779 pending	EMN AHQ 2024.16	Of 21,603 medical doctor applications received in 2023

Parameter / claim	Source	Detail
Activation rate PO1: 5–10 per cent	Focus groups; intention-behaviour gap calibration	Limited information-only effect
Activation rate PO2: 15–25 per cent	Focus groups; FG4 (n=11, 88 per cent positive)	Moderate effect of binding common rules
Activation rate PO3 sectoral: 30–50 per cent	FG7 (n=16, 69 per cent positive)	Substantial structural effect for sectoral professions
BAU growth (sensitivity): 56.9 per cent expect growth	Survey of competent authorities Q29 (n=181)	27.6 per cent sig + 29.3 per cent slight + 37.6 per cent stable + 11 per cent decrease
Self-declared deterrence	Commission Recommendation (EU) 2023/2611	“High refusal rates and long processing times can deter TCNs”
Over-qualification gap: 19 pp	Eurostat lfsa_eoqgan	39.8 per cent TCN vs 20.8 per cent EU nationals (2023)
Academic confirmation	Damelang, Ebensperger and Stumpf (2025)	European Societies 27(4): 784–812

Annex 4.3 In-depth qualitative and quantitative assessment of impacts

The methodological approach follows a Cost-Benefit-Analysis (CBA) where the underlying effects are monetisable on the basis of the available evidence, complemented by Cost-Effectiveness-Analysis (CEA) elements where benefits can be quantified but not directly monetised. This combination is consistent with the Better Regulation Toolbox guidance for impact assessments of partial-harmonisation initiatives, with the analytical approach adopted in the parallel Action 2 work, and with the IA precedents on initiatives in the area of recognition of professional qualifications. The choice reflects the structure of the impacts produced by EU action on the recognition of third-country qualifications, which combine monetisable effects (administrative costs and cost-savings on existing procedures; welfare gains from processing-time reduction, as order-of-magnitude estimates) with effects that are partially or not directly monetisable (deterrence effects, brain waste, EU attractiveness, fundamental rights and procedural-fairness dimensions, intra-EU mobility)

The impacts retained for detailed assessment are those for which the policy options generate a direct, sizable and evidence-supported effect. Quantitatively assessed: (i)

administrative costs and cost-savings on existing procedures (applicant-side and CA-side); (ii) welfare gains from processing-time reduction (order of magnitude); (iii) broader economic effects / GDP-equivalent (order of magnitude, presented separately); and (iv) employer-borne recruitment costs (complementary). Qualitatively assessed and feeding the MCDA: deterrence effects on latent demand, brain waste, EU attractiveness, fundamental rights and procedural fairness, intra-EU mobility of recognised professionals.

Annex 4.4 Comparison of the POs and selection of the preferred one

For the purpose of comparing the policy options and identifying the preferred one, we structured our work according to two distinct activities, which we will carry out chronologically:

1. Comparison and ranking of the policy options according to the following criteria
2. Identification and assessment of the preferred policy option.

Criteria	Description
Effectiveness	***Effectiveness*** in achieving the policy objectives at the specific and general levels, e.g.: • Enable smoother and faster cross-border mobility of professionals. • Streamline and modernise recognition procedures through full and interoperable digitalisation. • Strengthen consistent implementation and coordination of recognition rules across Member States. • Enhance transparency, accessibility, and quality of information for applicants and authorities.
Efficiency	***Efficiency*** (value for money) i.e the extent to relationship between costs and benefits is appropriate. To the extent possible, we differentiated between regulatory charges (fees, levies and taxes etc.), compliance costs, administrative costs / administrative burden, enforcement costs, indirect costs. Efficiency benefits typically concern cost reductions and time savings.
Coherence	***Coherence, both internal and external*** (e.g. coherence of policy options with the EU legislative and policy (e.g. European Council Strategic Agenda 2024 – 2029, the Competitiveness Compass, and the Single Market Strategy) initiatives.

Criteria	Description
Proportionality	***Proportionality***, i.e. the extent to which policy options are appropriate and does not go beyond what is necessary to address the problems

Each activity is described in detail below.

Annex 4.4.2 Comparison and ranking of the policy options

For each of the policy options described in Chapter **Error! Reference source not found.**, w e have conducted a **detailed assessment** of the expected impacts. The main results are presented in Chapter 6, while the detailed assessment along with supporting evidence is provided in Annex 15.

For each option, we created detailed assessment tables (summary versions presented in Chapter 6, detailed versions presented in Annex 15. in relation to the impacts of each policy option. The assessment tables cover the following aspects:

- Effectiveness;
- Efficiency;
- Coherence;
- Proportionality;

Based on the qualitative and quantitative data collected throughout the assignment, for each policy option, we have analysed in the respective assessment table the nature and magnitude of the likely impacts of the policy options. The assessment tables include assessments of the:

- **Likelihood** (e.g. high, medium, low) that each selected impact will occur (or conversely the risk that the impact will not occur);
- Absolute and relative **magnitude** (quantified to proportionate extent within the framework of this assignment);
- Relative impact for **specific stakeholders**, differentiating per group of stakeholders involved; and
- **Evolution** over time (e.g. increase, decrease, stable).

An illustrative assessment table is provided below. A **scoring system** indicates the direction and size of impacts: positive (‘+’) and negative (‘-’), with values from 0 (no impact) to 3 (large impact), including half-steps for nuance. The scoring system will helping summarise the results of the IA and serve as a succinct guide to compare the POs.

Table 23 – Illustrative assessment table for Policy Option 1

Policy Option 1		Score
Assessment criteria	Description of the impacts and affected groups	
Effectiveness	Description of the extent to which the policy option can be expected to achieve the identified policy objectives	-3/+3
Efficiency	Description of the following types of costs, differentiated according to the groups of stakeholders involved: Regulatory charges (fees, levies and taxes etc.) Compliance costs Administrative costs Enforcement costs Indirect costs	-3/+3
	Description of the following types of benefits, differentiated according to the groups of players involved (e.g. economic operators, SMEs, citizens, public administrations): Direct regulatory benefits, including cost savings/reduction Indirect benefits	
Coherence	Consistency assessment of the provisions proposed by the policy option with objectives of the intervention and EU objectives in other relevant policy areas	-3/+3
Proportionality	Description of whether the policy option is appropriate and does not go beyond what is necessary to address the problem satisfactorily	-

Source: Author's elaboration based on the Better Regulation Guidelines

In particular with regard to the efficiency criterion, the completion of the assessment tables has been supported by a **quantitative assessment** of the costs and benefits of the impacts of the policy options. The aim of this analysis is to quantify and monetise costs and benefits to the extent proportionate within the framework of this assignment.

In order to compare and rank the policy options' performance *vis-à-vis* the baseline scenario, a Multi-Criteria Decision Analysis (MCDA) was carried out. This is a tool for the

qualitative analysis and comparison of a complex set of alternatives concerning the extent to which various measures achieve their objectives, are efficient, coherent etc. The MCDA is based on qualitative ratings and rankings with quantitative data supporting the assessment.

Annex 4.4.3 Identification and assessment of the preferred policy option

Once alternative policy options have been compared and ranked, the Team identified the **preferred policy option** for Action 3. The **first option in the policy permutation with the highest final score** will be selected as the preferred PO. Once the preferred PO has been identified, we performed an **in-depth assessment of the preferred PO** (for each action) (see Section**Error! Reference source not found.**) in terms of:

- Justification for the selection and description of the main advantages/disadvantages (including an anticipated disproportionate effect or unintended consequence);
- Detailed description of estimated costs and benefits, broken down as far as possible according to each identifiable action/obligation of the preferred option;
- Conformity with the principles of subsidiarity and proportionality;
- Identification of critical success factors and any accompanying measures to maximise positive impacts and / or minimise negative impacts and ensure that fundamental rights are protected.

Annex 4.5 Multi-Criteria Decision Analysis (MCDA)

The MCDA approach (Better Regulation Toolbox Tool #62) is typically carried out in three steps

Step 1: Set-up of the framework of criteria and indicators, as well as an assessment grid

We suggest comparing and running the policy (sub-) options vis-à-vis the baseline scenario in relation to effectiveness, efficiency, coherence, and proportionality.

The impacts of each policy option vis-à-vis the baseline scenario will have to be assessed and qualitatively ranked against these criteria. This involves the:

- Definition of a weighting system, through the attribution of a weight to each assessment criterion reflecting its significance in the IA process: a weight of “1” for more significant criteria and of “0,5” for the other criteria. The weights would be defined in agreement with DG EMPL and/or on the basis of consultation with

stakeholders, evidence emerging from the literature in this field, inputs from experts, etc.

- Definition of a scoring system, to be used to summarise the assessment of the adequacy of each measure with regard to each judgment criterion, i.e.:
  - Magnitude of impact:
  - Baseline scenario: Always ranked as “0”;
  - Other policy options: “1-3”; Little to no impact: “1”; Significant impact: “3”;
  - Direction of impact: Negative “-“; Positive “+”.

The ratings themselves are usually based on the triangulation of both qualitative and quantitative data collected throughout a study.

- Assessment of each measure and attribution of the scores about each assessment criterion. The awarded score will be complemented with a descriptive assessment, providing a rationale justifying the score and evidence supporting the judgment.

Table 24 provides an illustrative assessment grid.

Table 24 – Illustrative assessment grid

Criteria	Direction	Baseline	PO1	PO2	PO3
Effectiveness	+	0	3	3	2
Efficiency	+	0	2	3	1
Coherence	+	0	2	4	5

Source: Author’s elaboration based on the Better Regulation Guidelines

Annex 5. Competitiveness check

This annex assesses the competitiveness implications of the three policy options considered in this report against the dimensions of the Better Regulation competitiveness framework: cost and price competitiveness, international competitiveness, capacity to innovate, and SME competitiveness. The assessment relates to the recognition of qualifications and validation of skills qualifications and skills of third-country nationals: it captures the contribution of the initiative to the productive use of the human capital of qualified third-country nationals already present in the European Union, to the alleviation of structural skills shortages in the regulated and unregulated sectors most exposed to recognition barriers, and to the international attractiveness of the European Union as a destination for skilled migration. The assessment builds on the cost and welfare estimates in Section 7.2, including the sub-section on employer-borne administrative costs, and on the methodological framework set out in Annex 4.5; it is informed by the consultation evidence collected for the initiative and by the available European-level evidence on labour-market shortages and on the integration outcomes of third-country nationals.

Annex 5.1 Overview of impact on competitiveness

The table below provides an overview of the expected impacts of the preferred policy option (Policy Option 3 — Common rules including automatic recognition for selected professions) on the main dimensions of European Union competitiveness, as defined in the Better Regulation framework. Ratings are assigned on a scale from ++ (significant positive impact) to – – (significant negative impact), with 0 indicating no material impact relative to the baseline. References are provided to the relevant sections of the report where the underlying evidence is presented.

Table 25 - Overview of competitiveness impacts (preferred option: Policy Option 3)

Dimension of competitiveness	Impact (++ / + / 0 / – / – – / n.a.)	References to sub-sections of the report
Cost and price competitiveness (costs borne by businesses in accessing qualified labour inputs and complying with recognition requirements)	++	Policy Option 3 reduces per-procedure recognition costs by approximately 33–47% (central estimate approximately 40%) relative to the baseline, generating savings of approximately EUR 420–600 per procedure (central estimate approximately EUR 510) and approximately EUR 16.8–24.3 million per year at system level on the baseline of approximately 62,500 procedures per year (85 per cent realisation factor). The complementary employer-borne administrative cost saving is in the order of magnitude of EUR 14–30 million per year, with a per-recruitment cost reduction of approximately 35–50 per cent for sectoral professions covered by automatic recognition. The consultation evidence[206] consistently identifies the duration and unpredictability of recognition procedures as the most binding cost component for firms recruiting qualified third-country nationals. See Section 7.2 (Costs and cost-savings, including the sub-section on employer-borne administrative costs) and Annex 4.5.
International competitiveness (attractiveness of the European Union as a destination for skilled migration; capacity of EU firms in regulated sectors to access global talent)	++	Policy Option 3 directly addresses two structural deterrents to skilled migration to the European Union documented in the EMN-OECD Inform 2025 on attracting foreign talent and in the OECD Indicators of Immigrant Integration: the unpredictability of recognition outcomes and the duration of the procedure. The EU framework for the automatic recognition of selected qualifications (A11), based on prior verification of learning programmes against EU standards, materially shortens the procedure for specific sectoral professions and substantially reduces the residual risk of non-recognition for qualifications obtained through approved programmes. The Draghi Report (2024) identifies barriers to skilled-labour mobility as a structural weakness of European Union competitiveness relative to global competitors; the initiative addresses this weakness in the third-country dimension. See Section 7.1 and Section 7.2.
Capacity to innovate (access to skilled human capital in STEM-adjacent regulated and partially regulated occupations; reduction in brain waste)	+	Policy Option 3 reinforces the capacity of the European economy to absorb and productively employ the human capital of qualified third-country nationals. The welfare gain from reduced waiting time — in the order of magnitude of EUR 300 million per year— captures the value of forgone earnings during the recognition procedure and reflects, indirectly, the productive capacity that is currently inactive or misallocated. The EMN-OECD 2025 study on labour-market integration documents the persistence of overqualification and brain-waste phenomena affecting third-country nationals across Member States, with structural consequences for the productive use of foreign human capital. By materially compressing the procedure for sectoral professions and by introducing common procedural standards , the preferred option supports the efficient allocation of skilled labour across the European Union. See Section 7.2 (Welfare-side effects, Level 3) and Annex 4.5.

[206] Source: focus group with employers, public consultation employer/business sub-sample, dedicated TCN survey and SME Panel Survey (2026, n=159).

Dimension of competitiveness	Impact (++ / + / 0 / – / – – / n.a.)	References to sub-sections of the report
SME competitiveness (disproportionate burden of recognition barriers on small and medium-sized enterprises relative to large firms)	++	Recognition barriers affect small and medium-sized enterprises asymmetrically. SMEs lack the dedicated HR capacity available to larger firms and face higher per-recruitment information and coordination costs when handling third-country qualification dossiers. The SME Panel Survey (2026, n=159) documents a mean external cost per hire involving third-country qualifications of approximately EUR 2,875 (median EUR 750) and a mean process duration of approximately 91 days (median 65 days), compared with approximately EUR 814 and 37 days for non-national EU qualifications and approximately EUR 657 and 21 days for national qualifications. SME respondents anticipate cost savings of approximately 26–36 per cent across cost categories from a common EU digital recognition system, This SME Panel question captured respondents' anticipated savings from a common, more digital EU recognition framework; the figures are reported as SME-perceived savings that corroborate — and do not drive — the Section 7.2 estimate. The Action 3 digital element (verifiable digital credentials) is limited to a criterion for third-country institutions seeking accreditation under the automatic-recognition route (measure A12), not an EU-level infrastructure investment, with the highest savings on internal administrative time (36 per cent), translation and certification (35 per cent) and recruitment-related costs (34 per cent). Policy Option 3 addresses this asymmetric burden through three complementary channels: the substantial reduction in procedure duration for sectoral professions covered by automatic recognition; the procedural and documentary discipline introduced by the common rules (A1–A10) carried over from Policy Option 2; and the verifiable digital credentials (A12) reducing the residual-risk premium that SMEs disproportionately bear in cross-border recruitment. See Annex 6 (SME check) and Section 7.2 (employer-borne administrative costs).

Source: Authors' elaboration

The Policy Option 3 welfare gain referenced in this annex is in the order of magnitude of EUR 300 million per year, on a four-month sectoral processing time and an 85 per cent realisation factor. The Policy Option 1 and Policy Option 2 figures and the comparative competitiveness ranking are unchanged. References in this annex to a “common EU digital recognition system” or a “digital-credentials infrastructure” describe SME-survey respondents’ expectations of a more common and more digital framework; Action 3 does not introduce an EU-level digital infrastructure as a policy measure — the use of verifiable digital credentials is a criterion for third-country institutions under measure A12 of Policy Option 3.

Annex 5.2 Synthetic assessment

Among the three policy options assessed, Policy Option 3 generates the most significant positive contribution to European Union competitiveness in the third-country dimension of qualification recognition. The assessment is grounded in the quantitative estimates set out in Section 7.2 and in the consultation evidence collected for the initiative.

On cost and price competitiveness, Policy Option 3 produces the largest absolute reduction in per-procedure recognition costs — central saving of approximately EUR 510 per procedure and approximately EUR 16.8–24.3 million per year at system level (central estimate approximately EUR 20.5 million) — substantially exceeding Policy Option 1 (approximately EUR 54 per procedure; approximately EUR 2.2–4.5 million per year, central EUR 3.4 million) and Policy Option 2 (approximately EUR 208 per procedure; approximately EUR 10.6 –15.4 million per year, central EUR 13 million). On the complementary employer-borne dimension, Policy Option 3 delivers an indicative aggregate saving in the order of magnitude of EUR 14–30 million per year, against EUR 8–18 million per year under Policy Option 2 and EUR 2–6 million per year under Policy Option 1. The 85 per cent realisation factor applied to Policy Option 3 (95 per cent retained as upper-bound sensitivity) reflects the binding character of its provisions and the structural simplification introduced by the automatic-recognition route for sectoral professions, which distinguishes it from the soft-law approach of Policy Option 1 and from the procedural-alignment approach of Policy Option 2. For employers in regulated sectors relying on cross-border recruitment of third-country nationals, this translates directly into lower labour-input costs, more predictable recruitment timelines and a reduction in the residual-risk premium associated with the verification of foreign qualifications.

On international competitiveness, Policy Option 3 addresses two structural deterrents to skilled migration to the European Union — the unpredictability of recognition outcomes and the duration of the procedure — that the available European-level evidence consistently identifies as material constraints on the ability of the European Union to compete with other major destination economies for global talent. The introduction of the EU framework for the automatic recognition of selected qualifications, supported by the public register of approved third-country learning programmes (B15) and by the verifiable digital credentials infrastructure (A12), establishes a level of predictability for qualifying applicants that is not currently achievable under any Member State framework taken in isolation. The welfare gain

from reduced waiting time, in the order of magnitude of EUR 300 million per year, captures the productive value released by faster procedures and constitutes a broader macroeconomic dimension of the competitiveness contribution. Policy Options 1 and 2 generate positive competitiveness effects relative to the baseline, but of materially lower magnitude: Policy Option 1 yields a welfare gain in the order of magnitude of EUR 33.5 million per year, and Policy Option 2 in the order of magnitude of EUR 273.5 million per year.

On SME competitiveness, Policy Option 3 addresses the asymmetric burden that recognition procedures currently place on smaller firms recruiting third-country nationals. The SME Panel Survey (2026) documents a sharp gradient in employer-borne costs by qualification origin — approximately EUR 657 for national qualifications, approximately EUR 814 for non-national EU qualifications, and approximately EUR 2,875 for third-country qualifications — together with corresponding differentials in process duration and internal administrative time. Position papers from Business Europe (2026) and SME United (2026) confirm that bureaucratic complexity, documentary requirements and limited digital processes are the primary obstacles encountered by firms when recruiting from third countries. The mandatory procedural rules carried over from Policy Option 2 — deadlines, documentary discipline, fee transparency, right of appeal — eliminate the elements of unpredictability that are most costly relative to firm size. The automatic-recognition route for sectoral professions concentrates the strongest effect on healthcare , while the common procedural rules generate broader benefits for SMEs operating in construction-adjacent regulated trades, engineering and other shortage occupations. Under measure A12, the use of verifiable digital credentials is a criterion for third-country institutions seeking accreditation under the automatic-recognition route, supporting authenticity verification and reducing the residual-risk premium SMEs face in cross-border recruitment; A12 is not an EU-level digital infrastructure investment. On capacity to innovate, the effects of Policy Option 3 are indirect but consistent in direction. Faster and more predictable recognition releases the productive capacity of qualified third-country nationals into qualification-matched employment, materially reducing the brain-waste phenomenon documented in the EMN-OECD 2025 study on labour-market integration of third-country nationals and in the OECD Indicators of Immigrant Integration. The welfare gain estimate captures this dimension at the macro level. Policy Option 2 reaches approximately 12–17 per cent of the baseline cost on the per-procedure dimension and a welfare gain in the order of magnitude of EUR 273.5 million per year — a material improvement, but insufficient to deliver the structural shift in attractiveness and procedural predictability that the international-competitiveness dimension requires.

Annex 5.3 Competitive position of the most affected sectors

The table below presents the current competitive position and the expected impact of Policy Option 3 for the five sectors most significantly exposed to recognition barriers in the third-country dimension: healthcare and social services, construction and craft trades, engineering and technical services, education, and information and communication technology. The selection reflects the convergent evidence from the European Labour Authority (2024) on Member State-level labour shortages, from the OECD Indicators of Immigrant Integration and the EMN-OECD 2025 study on labour-market integration of third-

country nationals, from the SME Panel Survey (2026, n=159) on the sectoral exposure of small and medium-sized enterprises, and from the consultation evidence collected for the initiative.

Table 26 - Competitive position of the most affected sectors and expected impact of Policy Option 3

Sector	Current competitive position and key challenges	Expected impact of Policy Option 3
Healthcare and social services	The most acutely affected sector in the third-country dimension. The European Labour Authority (2024) documents shortages of specialist medical practitioners in 75 per cent of EU countries, generalist practitioners in 64 per cent, and nurses in 78 per cent. The integration of qualified third-country health professionals — doctors, nurses, midwives, dentists, pharmacists — is structurally constrained by the duration, unpredictability and cost of recognition procedures. The seven sectoral professions covered by harmonised minimum training requirements under Directive 2005/36/EC include the core healthcare occupations, but the recognition pathway for third-country qualifications differs structurally from the intra-EU pathway, with case-by-case assessment, additional documentation and frequent activation of compensation measures. The brain-waste phenomenon affecting third-country health professionals is documented in the EMN-OECD 2025 study and in the OECD Indicators of Immigrant Integration.	Policy Option 3 introduces the most material change in this sector. The automatic-recognition route for sectoral professions (A11), based on prior verification of learning programmes against EU standards, materially compresses the procedure for healthcare occupations whose third-country qualifications meet the verification standard. The combination of common procedural rules (A1–A10) and the EU-level service for authenticity checks (A8) addresses the residual cases handled outside the automatic-recognition perimeter. The procedure-time reduction for sectoral professions covered by automatic recognition — from approximately 14.2 months on the baseline to approximately 4 months — directly alleviates vacancy duration in healthcare. The welfare gain attributable to the healthcare component of the sectoral perimeter is the single largest contribution to the order of magnitude of EUR 192.3 million per year estimated at system level.
Construction and craft trades	Construction and craft trades are consistently identified as among the sectors most affected by labour shortages across the European Union, with specific shortages of electricians, plumbers, roofers, carpenters and other regulated craft professionals in several Member States. The sector is dominated by SMEs and micro-enterprises with limited administrative capacity. Recognition procedures for craft professions exposed to safety and consumer-protection considerations are particularly burdensome, with documentary requirements that vary widely across Member States and frequent activation of compensation measures for third-country applicants. The position paper of SME United (2026) explicitly identifies the streamlining of recognition of foreign qualifications as a key measure to support craft-sector workforce integration. The interface between recognition procedures and labour-migration procedures is particularly sensitive in this sector.	Policy Option 3's mandatory procedural rules (A1–A10) and limitation on documentary requirements (A5) directly address the documentation complexity that burdens craft-profession recognition. The mandatory fee discipline (A7) removes cost unpredictability for SMEs supporting the recognition of third-country workers. The interoperable national databases on the comparability of third-country qualifications (A9) reduce the information asymmetry that structurally affects craft-profession assessment. While the automatic-recognition route (A11) does not directly cover craft professions in its initial perimeter — which is grounded in the harmonised minimum training requirements for sectoral professions — the underlying common procedural rules apply uniformly across the recognition remit, generating substantial improvements for craft-profession recognition relative to the baseline.

Sector	Current competitive position and key challenges	Expected impact of Policy Option 3
Engineering and technical services	Engineering occupations — civil, mechanical, electrical and mechatronics engineers — are consistently identified as among the sectors with the broadest skills shortages across Member States, particularly in Germany, Austria, Spain and other Member States with active industrial bases. The position paper of Business Europe (2026) documents shortages of IT experts, electrical engineers, mechatronics specialists and technical professionals across multiple Member States. Engineers are regulated in most Member States, but the regulatory architecture differs widely. Recognition procedures for third-country engineering qualifications face particular difficulties in establishing the equivalence of the technical content of foreign engineering programmes with national curricula, with frequent activation of compensation measures.	Policy Option 3's common procedural rules (A1–A10) introduce uniform standards for the assessment of third-country engineering qualifications, including the documentary discipline of A5, the multilingual document acceptance of A6 and the procedural guarantees of A4. The interoperable national databases on the comparability of third-country qualifications (A9) and the EU-level service for authenticity checks (A8) substantially reduce the information costs of the substantive assessment. While engineering is not in the initial perimeter of the automatic-recognition route, the underlying common rules apply uniformly, generating material improvements in procedural predictability and timeline. The verifiable digital credentials (A12) particularly support employer-side trust in cross-border engineering recruitment, with proportionally larger benefits for SMEs.
Education	Teaching is regulated in most Member States, with substantial heterogeneity across qualification levels. The recognition of third-country teaching qualifications is characterised by lengthy procedures and wide variation in documentary requirements, particularly for language-of-instruction professions and for early-childhood education. The European Labour Authority documents teaching shortages in several Member States, with growing salience of STEM-subject and special-needs teaching shortages. The interface between recognition procedures and language-proficiency assessment is particularly relevant in this sector. The SME Panel Survey (2026) records education as one of the most represented sectors among respondent firms, reflecting the relevance of the sector for cross-border recruitment in private and non-formal education.	Policy Option 3's common procedural rules — particularly the procedural guarantees on deadlines and substantiated decisions (A4), the documentary discipline (A5), the multilingual document acceptance (A6) and the right of appeal (A4) — reduce procedure duration and unpredictability for teaching qualifications. The interoperable national databases (A9) support more consistent treatment of third-country teaching qualifications across Member States. Teaching is not in the initial perimeter of the automatic-recognition route, but the underlying procedural improvements apply uniformly, generating material benefits relative to the baseline.

Sector	Current competitive position and key challenges	Expected impact of Policy Option 3
Information and communication technology	ICT occupations are largely unregulated across Member States, but specific ICT occupations — particularly those exposed to cybersecurity, critical-infrastructure or regulated-data considerations — face recognition or validation requirements that affect the integration of qualified third-country professionals. The sector experiences structural shortages across the European Union, documented in the European Labour Authority (2024) shortage occupation evidence and confirmed by Business Europe (2026) for IT experts in industrial Member States. The validation of skills acquired through non-formal pathways — particularly relevant in the ICT sector — is currently fragmented, with no harmonised European-level framework. The SME Panel Survey (2026) records ICT and telecommunications among the represented sectors of respondent firms.	Policy Option 3's common procedural rules apply to the regulated component of ICT occupations and improve the predictability and timeline of recognition where required. For the unregulated component, the improvements in information transparency — the minimum mandatory information requirements (A3) and the EU-level information infrastructure — support employer-side ability to assess third-country ICT qualifications more reliably. The verifiable digital credentials infrastructure (A12), although primarily designed for the automatic-recognition route, has spillover benefits in unregulated ICT occupations through the increased trust in standardised qualification documentation. The validation pathway, while outside the formal recognition framework, benefits indirectly from the procedural and informational discipline introduced by the common rules.

Source: Authors' elaboration

Annex 6. SME check

Overview of impacts on SMEs

Relevance for SMEs

Based on the SME filter applied during the scoping of this impact assessment; the initiative is relevant for SMEs. SMEs are present across the sectors most affected by recognition barriers in the third-country dimension — in particular healthcare and social services (private providers), construction and craft trades, engineering and technical services, education (private institutions) and information and communication technology. They are affected as employers whose cross-border recruitment decisions involving third-country nationals are constrained by recognition and validation procedures, and as firms whose owner-operators or key staff hold third-country qualifications requiring recognition for the exercise of regulated professions.

(1) Identification of affected businesses and assessment of relevance

Are SMEs directly affected? In which sectors?

Yes. SMEs are directly affected in two ways: as employers in sectors with regulated and partially regulated professions relying on the recognition system when recruiting third-country nationals; and as professional service operators whose owner-operators hold third-country qualifications requiring recognition for the exercise of a regulated profession. The SME Panel Survey (2026, n=159) documents that the share of respondents reporting cross-border hiring experiences in the previous five years exceeds half, with a substantial part of these experiences involving third-country qualifications: 21 per cent of respondents had hired from both other EU countries and third countries, and 17 per cent mostly from third countries. Key affected sectors include healthcare and social services (private providers); construction and craft trades; engineering and technical services; education (private institutions); information and communication technology; and the broader manufacturing-adjacent regulated and partially regulated occupations. The SME Panel Survey sample is distributed across sectors as follows: manufacturing (23 per cent), professional, scientific and technical activities (10 per cent), other service activities (8 per cent), education (8 per cent), with additional representation from accommodation and food services, ICT and wholesale and retail sectors (around 6 per cent each). These figures reflect the composition of the survey sample and provide indicative coverage across sectors rather than a direct measure of impact intensity. Source: SME Panel Survey (2026, n=159); SME United (2026); Business Europe (2026); Eurostat migr_resfirst.

Estimated number of directly affected SMEs

The European Union has approximately 26.1 million SMEs (Annual Report on European SMEs 2024/2025, European Commission/Joint Research Centre). Approximately 1.1 million first employment-related residence permits were issued to third-country nationals in the EU-27 in 2024 (Eurostat migr_resfirst), of which an indicative sub-set of approximately 50,000 per year correspond to recruitments of recognised third-country professionals. The figure is obtained from Eurostat migr_resfirst 2024 (approximately 1.1 million first employment-related residence permits issued to third-country nationals in the EU-27), of which approximately 15–25 per cent fall in regulated or partially regulated occupations (occupational distribution from the EMN-OECD 2025 labour-market-integration study and LFS 2023 by ISCO group), of which approximately 25–35 per cent effectively involve a formal recognition procedure (the remainder not requiring formal recognition or proceeding without it); applying these factors yields a central estimate of approximately 50,000 recruitments per year, range 30,000–80,000. This 50,000 figure is methodologically distinct from the 62,500 figure used in Section 7.2: the 62,500 figure counts annual formal recognition procedures (Annex 4.6), whereas the 50,000 figure counts annual employer recruitments of recognised third-country nationals — a different unit of analysis. A substantial part of these recruitments is supported by SMEs operating in the sectors most exposed to recognition barriers. SME United (2026) emphasises that the regulatory framework for professional qualifications differs significantly between Member States and that craft-sector regulation alone covers a large number of regulated professions across the European Union. Source: Annual Report on European SMEs 2024/2025 (European Commission/Joint Research Centre); Eurostat migr_resfirst; SME United (2026).

(1) Identification of affected businesses and assessment of relevance

Estimated number of employees in directly affected SMEs

A precise count of employees of directly affected SMEs is not available, given the absence of a consolidated dataset linking the recognition procedures involving third-country nationals to employer-firm characteristics. Eurostat Structural Business Statistics (sbs_sc_ovw, 2023) document approximately 12.1 million persons employed in SMEs in construction and approximately 15.4 million in manufacturing — two large SME-intensive sectors directly affected by skills shortages and recognition-related barriers. The European Labour Authority (2024) documents shortages of specialist medical practitioners in 75 per cent of EU countries, generalist practitioners in 64 per cent, and nurses in 78 per cent, indicating that a substantial number of positions in these professions — many within SME-scale organisations such as private clinics and care homes — are affected by the current recognition framework. Source: Eurostat Structural Business Statistics (sbs_sc_ovw, 2023); European Labour Authority (2024).

Are SMEs indirectly affected? In which sectors? What is the estimated number of indirectly affected SMEs and employees?

Yes. SMEs in sectors with acute skills shortages are indirectly affected through extended vacancy periods that are disproportionately costly for smaller firms. The SME Panel Survey (2026) documents that the median process duration for the recognition of third-country qualifications is approximately 65 days (mean 91 days), substantially longer than for non-national EU qualifications (median 30 days, mean 37 days) and for national qualifications (median 15 days, mean 21 days). Both for national and non-national EU qualifications, this “process” refers to the employer’s in-house verification and assessment of the qualification, not to a formal recognition procedure (which generally does not exist for national qualifications and is not systematically required for non-national EU qualifications). Only the third-country figure includes the formal recognition procedure. The wording is corrected to distinguish in-house qualification checking from formal recognition. The longer tail of the third-country distribution — with a substantial share of cases extending beyond six months — is structurally more disruptive for SMEs than for large firms. Sectors most indirectly affected: healthcare and social services, construction and craft trades, engineering and technical services. An aggregate estimate of indirectly affected SMEs is not available from the primary data. SMEs operating in the sectors most exposed to recognition-related barriers and skills shortages — healthcare (private providers), construction and craft trades, engineering and technical services, education (private institutions) and ICT — are collectively in the order of 5–7 million SMEs across the EU (Eurostat Structural Business Statistics, sbs_sc_ovw, 2023), employing in the order of 35–40 million persons. A precise count linking these populations to the third-country recognition flow is not available; the figures are presented as indicative orders of magnitude, consistent with the Annual Report on European SMEs 2024/2025 (approximately 26.1 million SMEs in the EU) and the European Labour Authority (2024) shortage data for healthcare, construction, engineering and ICTSource: SME Panel Survey (2026, n=159); SME United (2026); European Labour Authority (2024).

(2) Consultation of SME stakeholders

How has the input from the SME community been taken into consideration?

SME stakeholders were consulted through several complementary channels. The SME Panel Survey (2026, n=159) provides the primary quantitative SME-specific evidence base, with respondent firms distributed across micro-enterprises (30 per cent), small enterprises (31 per cent), medium-sized enterprises (23 per cent), large enterprises (11 per cent) and self-employed (6 per cent), and across 18 EU and third countries. The position paper of Business Europe (2026) provides qualitative input from member federations on the industrial and manufacturing sectors and on the cross-cutting challenges of recognition of third-country qualifications. The position paper of SME United (2026) provides comprehensive input from the European association of crafts, trades and SMEs, with specific focus on the craft sector and on the structural deficiencies that smaller firms face when integrating workforce qualified abroad. The focus group with employers (FG5) and the public consultation employer/business sub-sample provide additional qualitative-quantitative evidence specific to the third-country dimension of qualification recognition. The input has been systematically integrated into the assessment of costs, benefits and mitigating measures in this Annex and in Section 7.2 of the Final Report. Source: SME Panel Survey (2026, n=159); Business Europe (2026); SME United (2026); focus group with employers (FG5); public consultation.

(2) Consultation of SME stakeholders

Are SMEs' views different from those of large businesses?

Yes, in structurally important ways. Large businesses can absorb recognition costs through dedicated HR departments, internal legal capacity and established relationships with external consultancies, whereas SMEs cannot. SME United (2026) emphasises that structural deficiencies of SMEs multiply when it comes to the search for qualified personnel at national, European or international level, and that complex bureaucratic procedures, lack of digital processes and divergence of national requirements create disproportionate obstacles for smaller firms. Business Europe (2026) documents that bureaucratic complexity, lack of digital processes and language barriers are the primary challenges that companies face in hiring workers with recognised qualifications, with particular relevance for the recruitment of third-country nationals. SMEs are disproportionately forced to rely on external consultancy or legal support — a category for which the SME Panel Survey records a mean cost of approximately EUR 545 per recognition procedure — or to forgo cross-border recruitment of third-country nationals entirely. SMEs place greater weight on binding procedural deadlines, free digital tools and standardised information; large businesses place additional weight on credential portability for senior mobile professionals and on the integration of recognition with internal mobility programmes. Source: SME Panel Survey (2026, n=159); Business Europe (2026); SME United (2026).

(3) Assessment of impacts on SMEs

What are the estimated direct costs for SMEs of the preferred policy option? — Qualitative assessment

Recognition procedures involving third-country qualifications impose costs that are qualitatively distinct for SMEs: opacity and unpredictability of fees, timelines and documentary requirements; fixed administrative burden — certified translations, legalisation, authenticity verification — disproportionate to SME capacity; and dependence on external consultancy or legal support that larger firms internalise. Business Europe (2026) identifies complexity of bureaucratic procedures, lack of digital processes and language and cultural barriers as primary obstacles. SME United (2026) notes high reallocation costs that smaller firms cannot easily absorb and emphasises that the streamlining of recognition of foreign qualifications and the reduction of administrative hurdles — while maintaining a high level of quality requirements — would directly support SME workforce integration in shortage sectors. Policy Option 3 does not impose significant new direct compliance costs on SMEs; the figures below describe the baseline employer-side costs that the preferred option is expected to reduce.

What are the estimated direct costs for SMEs of the preferred policy option? — Quantitative assessment

The SME Panel Survey (2026, n=159) provides the primary quantitative anchor for the SME-borne cost of recruiting workers with foreign qualifications. The cost gradient by qualification origin is sharp: for national qualifications, mean external cost per hire is approximately EUR 657 (median EUR 250); for non-national EU qualifications, mean approximately EUR 814 (median EUR 250); for third-country qualifications, mean approximately EUR 2,875 (median EUR 750). Mean process duration is approximately 21 days for national qualifications, 37 days for non-national EU qualifications and 91 days for third-country qualifications. Mean man-hours invested by the hiring organisation are approximately 40 for national qualifications, 55 for non-national EU qualifications and 125 for third-country qualifications. Among the cost components separately reported, the largest items are recruitment-related costs (mean EUR 1,619), bridging or training costs (mean EUR 526), external consultancy or legal support (mean EUR 545), fees for recognition bodies (mean EUR 407) and internal administrative time (mean EUR 354). For the population of recognised third-country professionals recruited per year — indicatively 50,000, calibrated as a sub-set of the approximately 1.1 million first employment-related residence permits issued in the EU-27 in 2024 (Eurostat migr_resfirst) — the aggregate baseline employer-borne cost is in the order of magnitude of EUR 50–100 million per year. Source: SME Panel Survey (2026, §9–10.1); Eurostat migr_resfirst; Section 7.2 (employer-borne administrative costs).

(3) Assessment of impacts on SMEs

What are the estimated direct benefits and cost savings for SMEs of the preferred policy option? — Qualitative assessment

Under Policy Option 3, SMEs benefit from binding procedural deadlines eliminating the long-tail vacancy periods that disproportionately disrupt smaller firms; the automatic-recognition route for sectoral professions, which eliminates the case-by-case substantive assessment for qualifying applicants in healthcare and the other sectoral occupations; mandatory fee discipline removing cost unpredictability; verifiable digital credentials for the qualifications benefiting from automatic recognition, reducing the residual-risk premium that SMEs disproportionately bear; standardised information requirements reducing reliance on external consultancy. Business Europe (2026) and SME United (2026) explicitly identify end-to-end digitalisation, fast-track recognition procedures and streamlined cooperation with third-country authorities as primary structural improvements needed.

What are the estimated direct benefits and cost savings for SMEs of the preferred policy option? — Quantitative assessment

The SME Panel Survey (2026, §10.1) documents anticipated mean cost savings from a common EU digital recognition system. The SME Panel question asked about anticipated savings from a common, more digital EU recognition framework. The replies reflect the combined effect of common rules and digitalisation (digitalisation being a minor element of Action 3, limited to verifiable digital credentials as a criterion for third-country institutions under measure A12). The figures are reported as SME-perceived savings that corroborate — and do not drive — the Section 7.2 estimate across cost categories, ranging from approximately 26 per cent (fees for recognition bodies) to approximately 36 per cent (internal administrative time). The full breakdown is: internal administrative time (36 per cent), translation and certification (35 per cent), recruitment-related costs (34 per cent), risk-related costs from partial or denied recognition (32 per cent), compliance costs (31 per cent), bridging or training costs (30 per cent), external consultancy or legal support (30 per cent), onboarding delays and reduced productivity (28 per cent), and fees for recognition bodies (26 per cent). The mean across all categories is in the order of 31 per cent. Perceived benefits: 68 per cent of respondents cited reduced administrative burden during recruitment, 63 per cent easier assessment of foreign qualifications, 61 per cent faster recruitment processes, 50 per cent easier hiring from other EU Member States and 50 per cent lower costs related to verifying qualifications. With reference to the third-country dimension specifically, Section 7.2 estimates a per-recruitment cost reduction of approximately 35–50 per cent under Policy Option 3 for sectoral professions covered by automatic recognition, corresponding to an aggregate employer-borne cost saving in the order of magnitude of EUR 14–30 million per year on a volume baseline of approximately 50,000 recruitments per year. Small and medium-sized enterprises account for approximately 84 per cent of the respondent firms in the SME Panel Survey (2026, n=159: micro 30 per cent, small 31 per cent, medium-sized 23 per cent), and recognition procedures place a proportionally heavier burden on them because of their limited HR capacity. On this basis, the SME-specific component of the employer-borne saving is in the order of magnitude of EUR 12–25 million per year under Policy Option 3, with SME realisation expected to be at or above the system average. Expressed per recruitment, the mean external recognition-related cost reported by SME respondents is approximately EUR 814 (median EUR 250), and the procedural-deadline and automatic-recognition measures of Policy Option 3 are expected to reduce the long-tail vacancy periods that disproportionately affect smaller firms. Source: SME Panel Survey (2026, §10–10.1); Section 7.2 (employer-borne administrative costs).

What are the indirect impacts of this initiative on SMEs?

Three categories of indirect impact are identified for SMEs. First, reduced vacancy duration: binding procedural deadlines (A4) and the automatic-recognition route for sectoral professions (A11) eliminate the long-tail third-country recognition cases that generate disproportionate disruption for SMEs operating under tight workforce-planning constraints; the SME Panel Survey records a mean process duration of approximately 91 days for third-country qualifications, compared with approximately 21 days for national qualifications. Second, improved cross-border deployment capacity: faster and more predictable recognition reduces the risk of deploying staff in other Member States for SMEs bidding on cross-border contracts in regulated sectors. Third, reduced information asymmetry: the harmonised information requirements (A3), the public register of approved third-country learning programmes (B15) and the verifiable digital credentials infrastructure (A12) reduce the SME reliance on external consultancy or legal support — a category for which the SME Panel Survey records a mean cost of approximately EUR 545 per procedure. Source: SME Panel Survey (2026, §9.1–10.1); Business Europe (2026); SME United (2026); Section 7.2.

(4) Minimising negative impacts on SMEs

Are SMEs disproportionately affected compared to large companies? If yes, are there any specific subgroups of SMEs more exposed than others?

Yes, but in a positive direction under Policy Option 3. Recognition barriers currently affect SMEs asymmetrically because smaller firms lack the dedicated HR capacity, internal legal expertise and established external networks available to large employers. SME United (2026) emphasises that structural deficiencies of SMEs multiply when it comes to the search for qualified personnel at national or European level, with particular salience for the recognition of foreign qualifications; Business Europe (2026) documents that bureaucratic complexity and lack of digital processes are the primary obstacles in cross-border recruitment, with disproportionate impact on smaller firms. Policy Option 3 corrects this asymmetry: the automatic-recognition route for sectoral professions, the verifiable digital credentials criterion (A12) and the standardised information and procedural requirements deliver proportionally larger benefits to firms without dedicated administrative capacity. The SME-specific realisation of the aggregate employer-borne cost reduction is therefore expected to be at or above the system average. The subgroups most exposed within the SME population are: micro and small enterprises without a dedicated HR or legal function (the SME Panel Survey records micro-enterprises at 30 per cent and small enterprises at 31 per cent of the sample); SMEs in the shortage sectors that rely most on third-country recognised professionals — healthcare and social-care providers (private clinics, care homes), construction and craft trades, and engineering and technical services; and SMEs bidding on cross-border contracts in regulated sectors, for which unpredictable recognition timelines translate directly into deployment risk. These subgroups benefit proportionally more from Policy Option 3 because the automatic-recognition route, the binding deadlines (A4) and the verifiable digital credentials (A12) remove precisely the fixed, capacity-insensitive burden that smaller firms cannot absorb.

Have alternative approaches been considered? (lighter regimes for SMEs, longer transitional periods, exemptions)

The recognition framework set out under Policy Option 3 is intentionally designed in a way that avoids the introduction of compliance obligations on SMEs themselves. SMEs are recipients of the simplification benefits of the initiative — through reduced employer-borne administrative cost in cross-border recruitment, faster procedures, more predictable timelines and improved information transparency — rather than parties on which new compliance obligations are placed. No new direct administrative obligation is imposed on SMEs by the initiative. Transitional measures are addressed at Member State level, where the implementation of the automatic-recognition framework, the verifiable digital credentials infrastructure and the interoperable database on the comparability of third-country qualifications would proceed gradually, in line with the maturity of national digital infrastructure and integration pathways. This staged implementation does not generate compliance costs for SMEs.

Have mitigating measures been included in the preferred option/proposal?

The initiative is designed to deliver SME benefits without imposing new SME-side compliance obligations. The mitigating measures supporting full SME realisation of the benefits include: standardised, accessible and timely information on the recognition procedures available at national level (A3); the public EU register of approved third-country learning programmes (B15) providing ex-ante predictability for employers; the verifiable digital credentials infrastructure (A12) eliminating the need for ad hoc authentication arrangements that smaller firms find disproportionately costly; the EU-level service for authenticity checks (A8) reducing SME reliance on direct interaction with third-country issuing institutions; and the binding procedural deadlines (A4) eliminating the open-ended vacancy periods that are most damaging to SMEs operating under tight workforce-planning constraints. Source: SME United (2026); Business Europe (2026); SME Panel Survey (2026); Section 7.2.

Contribution to the 35% burden reduction reference point for SMEs

Are there any administrative cost savings relevant for the 35% burden reduction reference point for SMEs?

Yes. On the recognition-procedure dimension, system-level burden reduction under Policy Option 3 is in the order of 33–47 per cent of the per-procedure baseline (central estimate approximately 40 per cent), as documented in Section 7.2 and Annex 4.5. The central estimate is positioned above the 25 per cent indicative simplification reference point and is broadly consistent with the 35 per cent level used as a reference for SME-relevant burden reduction. On the complementary employer-borne administrative cost dimension, SME-specific anticipated savings from a common EU digital recognition system, as documented in the SME Panel Survey (2026, §10.1), range from approximately 26 per cent (fees for recognition bodies) to approximately 36 per cent (internal administrative time), with a mean across all cost categories in the order of 31 per cent. The highest savings — internal administrative time (36 per cent), translation and certification (35 per cent), recruitment-related costs (34 per cent) and risk-related costs from partial or denied recognition (32 per cent) — are precisely the components where the asymmetric SME burden is most pronounced. SME-specific realisation is expected to be at or above the system average. Policy Option 1 (with welfare gain in the order of magnitude of EUR 33.5 million per year and per-procedure savings in the order of EUR 54) and Policy Option 2 (welfare gain in the order of magnitude of EUR 273.5 million per year and per-procedure savings in the order of EUR 208) deliver progressively smaller but still material improvements relative to the baseline, reflecting the limited reach of soft coordination and the intermediate nature of targeted procedural reforms respectively.

Source: Authors' elaboration based on SME Panel Survey (2026, n=159); Business Europe (2026); SME United (2026); Annual Report on European SMEs 2024/2025 (European Commission/Joint Research Centre); Eurostat Structural Business Statistics (sbs_sc_ovw, 2023); Eurostat migr_resfirst; European Labour Authority (2024); consultation evidence collected for the initiative (focus group with employers (FG5), public consultation employer/business sub-sample); Section 7.2 (Costs and cost-savings, including the sub-section on employer-borne administrative costs); Annex 4.5; Annex 3 (Who is affected and how); Annex 5 (Competitiveness check)

Annex 7. The EU legal and policy context

Annex 7.1 EU framework specifically affecting recognition for TCNs seeking to access a regulated profession

For the specific case of **recognition to access regulated professions**, the EU has exercised its competences to remove barriers to free movement in the internal market for EU citizens by adopting Directives to ensure the mutual recognition of diplomas, certificates and other evidence of formal qualifications.[207] These Directives have been consolidated in **Directive 2005/36/EC.** Although its personal scope is limited to EU citizens, **Recital (10)** specifies that "*This Directive does not create an obstacle to the possibility of Member States recognising, in accordance with their rules, the professional qualifications acquired outside the territory of the European Union by third country nationals. All recognition should respect in any case minimum training conditions for certain professions*."[208] Recital 10 thus explains that Member States can recognise the qualifications obtained outside the EU by TCNs in accordance with their national law, as long as they respect the minimum training conditions the Directive has introduced for specific professions. The Directive itself therefore does not lay down any binding rules that affect the national rules and procedures for recognizing qualifications held by TCNs. Nonetheless, as described below, in certain specific cases, equal treatment provisions laid down in the EU migration acquis will allow TCNs to indirectly benefit from the recognition rules laid down in the Directive.

Furthermore, the Directive is primarily focused on qualifications obtained in another EU Member State. Hence, EU citizens who are holders of qualifications from outside the EU will have to obtain the initial recognition of such qualifications under national law. Indeed, the Directive specifies that each Member State may allow EU citizens in possession of evidence of professional qualifications acquired in a third country to pursue a regulated profession in accordance with their national rules (Article 2(2)) thereby taking due regard of minimum training conditions where relevant. This initial recognition under national law opens the possibility of later recognition under the Directive's rules in case of intra-EU mobility. In this context, Article 3(3) states that a person, holding qualifications issued by a third country, who obtained recognition of such qualifications in a first Member State and practiced there for a minimum of three years, can subsequently rely on the procedures provided by the PQD to obtain recognition in another Member State. While this primarily applies to EU citizens, some categories of TCNs may also benefit from this provision due to equal treatment provisions combined with intra-EU mobility rights laid down in the EU legal migration instruments (see below). This applies particularly to those TCNs who obtained a right of residence in the EU pursuant to certain EU Directives. More specifically, Directives such as

[207] Art. 46 TFEU, Art. 53 TFEU and Art. 62 TFEU.
[208] European Parliament & Council of the European Union. (2005). Directive 2005/36/EC on the recognition of professional qualifications. Official Journal of the European Union. Available at: https://eur-lex.europa.eu/eli/dir/2005/36/oj/eng.

the Long-term Residents Directive (2003/109),[209] and Blue Card Directive (2021/1883),[210] contain equal treatment clauses and intra-EU mobility rights.[211] Despite this possibility, the Directive generally leaves the recognition of TCQs, **including those of EU citizens who obtained their qualifications from a third country** fully to national discretion.

The Directive also contains certain provisions requiring authorities to take due account of qualifications and experience gained outside the EU.[212] Follow-up is given to case law from the Court of Justice of the European Union (CJEU) in cases such as Vlassopoulou, Haim, and Hocsman where the Court held that Member States must consider all relevant professional experience and equivalent qualifications the individual possesses, including those obtained in a third country, in order to assess whether any differences in formal qualifications are substantively compensated by knowledge and skills acquired through practice. This ensures a proportionate recognition procedure consistent with free movement principles. Such case law has been consolidated in Articles 14(5) and 55(a) of the PQD which require CAs to take account of all relevant professional experience, including experience linked to TCQs, in order to assess equivalence and ensure that any compensation measures imposed are proportionate.

As mentioned, under the EU migration acquis, TCNs residing (lawfully) in a Member State have rights comparable to those enjoyed by nationals, including in the field of recognition of professional qualifications to access regulated professions. This is provided by the **principle of equal treatment** enshrined in several EU (legal) migration instruments presented below. Equal treatment here does not imply automatic or unconditional recognition of foreign qualifications. Rather, it requires that TCNs are treated equally with the nationals of the Member State concerned and thus have access to the same recognition procedures, under the same conditions and based on objective and non-discriminatory criteria. The equal treatment clauses are relevant for the initial recognition of qualifications in the same Member State in which the person obtained a work permit, requiring the relevant Member State to treat TCNs on an equal footing with its own nationals. Whereas for TCNs with **qualifications obtained outside the EU** this means that national rules and procedures will fully apply, for TCNs holding qualifications obtained in another Member State, the obligation to ensure equal treatment with nationals holding **qualifications from another Member State** means that the PQD rules should apply. The equal treatment requirement can also affect the situation of a TCN who moves to a second Member State and seeks a second recognition there. While the recognition of a qualification obtained in a third country will initially take place under the national law of the first Member State, if the TCN enjoys **intra-EU mobility rights** under the relevant migration Directive, the equal treatment provisions mean that, in line with Article 3(3) of the PQD, any subsequent recognition in a second Member State can occur under the rules of the general system laid down Directive 2005/36/EC, provided that the individual has practised the profession for at least three years in the first Member State.

[209] Council Directive 2003/109/EC of 25 November 2003 concerning the status of third-country nationals who are long-term residents. Available at: http://data.europa.eu/eli/dir/2003/109/oj

[210] EU Parliament (2021). *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*. Available at: http://data.europa.eu/eli/dir/2021/1883/oj

[211] Directives such as these are discussed further below.

[212] Art 3(3), Art. 13, Art. 14. European Parliament & Council of the European Union. (2005). Directive 2005/36/EC on the recognition of professional qualifications. Official Journal of the European Union. Available at: https://eur-lex.europa.eu/eli/dir/2005/36/oj/eng

However, recognition in a second Member State will only be possible where the TCN enjoys intra-EU mobility rights under the applicable Directive.

This equal treatment principle is explicitly embedded in several EU migration instruments with respect to recognition of qualifications, with different scopes and legal strengths mirroring the differentiated residence statuses of TCNs granted by the different migration Directives. However, as a rule, it does not lead to any harmonisation of the national procedures for the recognition of non-EU qualifications, thus maintaining the fragmentation at national level.

Directive 2003/109/EC on Long-Term Residents[213] provides comprehensive protection, explicitly guaranteeing equal treatment with nationals as regards the recognition of diplomas, certificates and other professional qualifications, as well as access to education and vocational training, thereby placing long-term residents in a position closely comparable to that of nationals in procedural terms.[214] The right to equal treatment regarding recognition of qualifications also applies upon reception of a residence permit in a second Member State.[215]

Directive 2024/1233/EU on the Single Permit,[216] the Intra-corporate Transferees Directive,[217] and the **EU Blue Card**[218] (specifically targeted at highly skilled TCNs) similarly provide for equal treatment in relation to the recognition of qualifications.[219] However, unlike long-term residents, this is closely tied to labour market participation, as both the Single Permit and EU Blue Card frameworks link residence to work. The Blue Card is directed to highly skilled workers, and Member States require the recognition of qualifications as a precondition to access the Blue Card framework, and therefore, for admission. The Equal Treatment Provision therefore applies insofar as the specific employment relationship grants a migrant access, as the Blue Card is typically issued on the basis of a job offer corresponding to the applicant's qualifications.

Directive 2014/36/EU on Seasonal Workers[220] guarantees equal treatment regarding procedures for recognition of qualifications in Article 23(1)(h). Such provision is particularly important if a seasonal worker will exercise a regulated profession.[221]

[213] Council Directive 2003/109/EC of 25 November 2003 concerning the status of third-country nationals who are long-term residents. Available at: http://data.europa.eu/eli/dir/2003/109/oj
[214] (Art 11(1) (a), (b), (c)). Council Directive 2003/109/EC of 25 November 2003 concerning the status of third-country nationals who are long-term residents. Available at: http://data.europa.eu/eli/dir/2003/109/oj
[215] See Article 21(1) Council Directive 2003/109/EC.
[216] Transposition into national law by Member States is due by May 2026. EU Parliament. (2024) *Directive EU 2024/1233 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*. Available at: https://eur-lex.europa.eu/eli/dir/2024/1233/oj/eng
[217] See Article 18 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, [2014] OJ L 157/1.
[218] *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*. Available at: http://data.europa.eu/eli/dir/2021/1883/oj
[219] See Article 12(1)(d) Directive 2024/1233 and Articles 16(1)(d), 21(4) Directive 2021/1883.
[220] *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.* Available at: http://data.europa.eu/eli/dir/2014/36/oj
[221] See Article 5(4) Directive 2014/36/EU.

Directive 2016/801/EU on Researchers[222] applies the provisions on equal treatment as seen in the Single Permit Directive in parallel. From this, researchers derive a right to equal treatment regarding recognition of their qualifications.[223]

Finally, with regard to beneficiaries of international protection, the **Qualification Regulation** (due to enter into force on 1 July 2026) sets out **common standards** across the EU for granting international protection to TCNs or stateless persons who qualify as refugees or as beneficiaries of subsidiary protection.[224] It defines the criteria for protection status and associated rights (including access to employment, education, and recognition) and ensures consistent application across Member States. It mandates that Member States shall assist TCNs with the recognition of their qualifications.[225] The **Qualification Regulation** has thereby expanded the equality of treatment to also include access to schemes for validation of skills beyond the equal treatment regarding recognition procedures for foreign qualifications guaranteed under the **Qualification Directive**.[226] In a similar manner, **Directive (EU) 2024/1346** (**Reception Conditions**) establishes harmonised minimum reception standards for applicants for international protection across EU Member States (excluding IE and DK), ensuring that asylum seekers and their family members receive adequate material conditions.[227] Among other provisions, it confirms that applicants with access to the labour market are entitled to equal treatment with nationals regarding recognition of "diplomas, certificates and other evidence of formal qualifications in the context of existing procedures for recognition of foreign qualifications"[228] and mandates that "*Member States shall facilitate, to the extent possible, full access to existing procedures for the recognition of foreign qualifications for applicants who cannot provide documentary evidence of their qualifications.*"[229] In a similar manner, beneficiaries of the Reception Conditions Directive also obtain equal treatment regarding schemes for the assessment, validation and recognition of prior learning outcomes and experience.[230] Nevertheless, under

[222] *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 (recast).* Available at: http://data.europa.eu/eli/dir/2016/801/oj

[223] See Article 22(1) Directive 2016/801 io. Article 12(1)(d) Directive 2024/1233.

[224]European Parliament & Council of the European Union. (2024). *Regulation (EU) 2024/1347 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.* Official Journal of the European Union, L, 2024/1347
. Available at: http://data.europa.eu/eli/reg/2024/1347/oj

[225] Art 28. EU Parliament. (2011). *Directive 2011/95/EU of the European Parliament and of the Council of 13 December 2011 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 (recast)*, *2011/95/EU*. Available at: https://eur-lex.europa.eu/eli/dir/2011/95/oj/eng

[226] See article 28 Directive 2011/95/EU of the European Parliament and of the Council of 11 December 2011 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, [2011] OJ L 377/9; Article 30 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, [2024] OJ L 1/34.

[227] The Directive is due to be transposed by 12 June 2026. EU Parliament (2024) *Directive (EU) 2024/1346 of the European Parliament and of the Council of 14 May 2024 laying down standards for the reception of applicants for international protection*. Available at: https://eur-lex.europa.eu/eli/dir/2024/1346/oj/eng

[228] Art. 17(3)(d) Directive (EU) 2024/1346 of the European Parliament and of the Council of 14 May 2024 laying down standards for the reception of applicants for international protection, [2024] OJ L 1/35. The Directive is due to be transposed by 12 June 2026.

[229] Art. 17(8) Directive (EU) 2024/1346.

[230] Directive 17(3)(e) Directive (EU) 2024/1346.

the Reception Condition Directive Member States may restrict the right to equal treatment for the first three months after registration of the application for international protection.[231]

Both instruments therefore provide similar equal treatment rights and oblige Member States to assist applicants and beneficiaries of international protection who lack documentary evidence of their qualifications in accessing recognition procedures or alternative validation mechanisms. Examples of these instruments include the European Qualification Passport for refugees, a document that explains the qualification a refugee is likely to have based on available evidence and used whenever documentation is missing or incomplete.[232] At present 12 EU Member States (AT, DE, EL, FR, HR, IE, IT, LV, NL, PL, PT, RO) participate in the initiative.

Annex 7.2 EU framework affecting recognition of qualifications of TCNs more broadly, including in the context of migration procedures

In recent years, the EU has introduced several initiatives that targeted recognition procedures more broadly, also including **recognition to access regulated professions and as part of labour migration procedures.** These initiatives have directly and indirectly led to improvements in the recognition of TCQs. In particular, the 2023 **Commission Recommendation (EU) 2023/2611 on the Recognition of Qualifications of TCNs,** part of the Communication of the Skills and Talent Mobility Package**,** urges Member States to simplify recognition procedures for TCNs' skills and qualifications, to better support their integration in the labour market and, in turn, address labour and skills shortages in the EU.[233] A summary of the main suggestions is presented in Box 3.

Box 3 – Main suggestions presented in Recommendation (EU) 2023/2611

Chapter II – Principles

- Application of a "skills first" approach, assessing the actual skills and experience, not just the formal qualifications of TCNs
- Avoid unnecessary labour market tests, especially for SMEs
- Ensure recognition is not required for unregulated professions

Chapter III – Organisation

- Investment in capacity building of relevant authorities (ENIC; NARIC)
- Use EU-wide tools like the ELM, ESCO (European skills, competences, qualifications and occupations) classification, and EQF (European Qualification Framework) for data standardisation
- Cooperate with third countries to build trust and streamline recognition processes (including pre-arrival access to recognition procedures, exchange knowledge on relevant qualifications – e.g. learning outcomes, structure of the training system, scope of regulated professions –, organise study visits, join projects, establish common procedures)
- Provide multilingual, mobile-friendly, and accessible information and support services (including minimising translation burdens, using eTranslation, facilitating authentication of documents, ensuring transparency on costs)

Chapter IV – Recognition of Professional Qualifications

- Align recognition processes with Directive 2005/36/EC (including: following rules equivalent to those set out in art. 13(1), considering 3 years of professional experience as evidence of formal qualification, apply compensation measures only in cases set out in art. 14)

[231] Article 17(4)(c) Directive (EU) 2024/1346.

[232] Council of Europe. European Qualification Passport for Refugees. Available at: https://www.coe.int/en/web/education/recognition-of-refugees-qualifications

[233] European Commission. (2023). Commission Recommendation (EU) 2023/2611 of 15 November 2023 on the recognition of qualifications of third-country nationals. Brussels. Available at: http://data.europa.eu/eli/reco/2023/2611/oj/eng

- Fast-track recognition for priority professions (e.g. healthcare, engineering) and minimise processing times (under 4 weeks)
- Allow temporary supervised employment while recognition is pending.
- Offer language training where needed

Chapter V – Recognition of Skills and Qualification for Labour Migration

- Integrate recognition into migration procedures (e.g. visa/work permit)
- Enable pre-departure recognition to avoid delays
- Prioritise skills and experience over formal qualifications

Chapter VI – Final Provisions

- Ensure equal treatment between EU citizens and TCNs
- The Commission will support Member States through: Technical assistance; development of interoperable databases, online resource hubs (e.g. Europass); tools for comparability statements and multilingual support

Source: Commission Recommendation (EU) 2023/2611

As part of the EU response to the large number of arrivals of people fleeing Russia's invasion of Ukraine, the Commission issued **Recommendation (EU) 2022/554**, inviting Member States to adopt specific measures to facilitate the recognition of qualifications obtained in Ukraine.[234] Various Member States (including AT, BE, EE, ES, IT, LT, LV, PL, PT, and RO)[235], have introduced temporary waivers to qualification recognition requirements for displaced Ukrainian professionals in target occupations. This allows early access to professional practice to Ukrainian-qualified professionals[236] under the supervision of locally qualified professionals, while helping to address shortages heightened by displacement itself, notably in the healthcare and education sectors.[237] Such approaches have undoubtedly served the double purpose of effectively catering to growing, unmet, demand for basic services, including by the displaced Ukrainian population itself, and facilitating the swift and optimal labour market insertion of Ukrainian professionals while in displacement. These approaches have also demonstrated the flexibility of contemporary regulatory systems in emergencies, acting as a testing ground for streamlined qualification recognition procedures. Yet, only in less than a handful of countries (notably, in AT, HU and PL) do favourable conditions exist for the recognition of Ukrainian professionals who have practiced their profession temporarily in the host country under a qualification recognition waiver. In most cases, the absence of a clear pathway allowing these professionals to obtain qualification recognition swiftly after a certain time practicing under supervision is a lost opportunity for the TCN professionals themselves, and for the economies of both the EU and its Member States.[238] Moreover, the prolonged ad hoc favourable treatment for Ukrainian qualifications has raised equity concerns vis à vis the many TCNs, including those

[234] EU Commission. (2022). *Commission Recommendation (EU) 2022/554 of 5 April 2022 on the recognition of qualifications for people fleeing Russia's invasion of Ukraine*. Available at: https://eur-lex.europa.eu/eli/reco/2022/554/oj/eng

[235] In some cases, as in Austria and Italy, the waivers built on similar approaches adopted during the COVID-19 emergency to allow TCN-qualified health professionals' swift access to professional practice, in line with Communication from the Commission Guidance on free movement of health professionals and minimum harmonisation of training in relation to COVID-19 emergency measures – recommendations regarding Directive 2005/36/EC 2020/C 156/01. Available at: EUR-Lex - 52020XC0508(01) - EN - EUR-Lex

[236] The application of the EU Temporary Protection Directive (TPD) and of similar national statuses for people fleeing the war in Ukraine has allowed people displaced from Ukraine immediate working rights in their host countries. In regulated professions, these immediate working rights could only materialize provided swift or waived qualification recognition procedures European Commission, Communication from the Commission to the European Parliament and the Council, Temporary protection for those fleeing Russia's war of aggression against Ukraine: one year on, Com(2023) 140 final.

[237] For a comprehensive overview of these developments see: Desiderio, M.V. (2025), https://www.iom.int/sites/g/files/tmzbdl2616/files/documents/2025-03/enhancing-labour-market-inclusion-for-people-displaced-from-ukraine.pdf, Geneva, IOM Publishing, and Desiderio, M. V. and K. Hooper (2023), Displaced Ukrainians in European labor markets; leveraging innovations for more inclusive integration, Brussels, MPI Europe.

[238] Desiderio M.V. and F. Poeschel (2025), *Evidence gathering on the recognition of qualifications of third-country nationals*, internal report for the European Commission (DG EMPL).

already residing in the EU, and who have been struggling for years to obtain recognition of their foreign-acquired qualifications.[239]

Furthermore, there are a series of strategic initiatives related to skills attraction that might have an impact on recognition processes. In 2023 the Commission issued its **Communication of the Skills and Talent Mobility Package**, which introduces a range of measures designed to increase the EU's attractiveness to skilled workers from beyond its borders, whilst also simplifying internal mobility,[240] which is crucial for enabling TCNs to commute to work across the border. In particular, it outlines a series of complementary actions aimed at enhancing the EU's international appeal and strengthening mobility within the EU. A key proposal is the establishment of an EU Talent Pool. Once adopted and developed it will be the first EU-wide matching tool connecting jobseekers from third countries residing outside the EU with employers in Member States experiencing skill shortages and that participate in the initiative on a voluntary basis.

Moreover, the Communication of the Skills and Talent Mobility Package pledges to enhance transparency and interoperability in recognition systems. Proposed measures include:

- Encouraging Member States to create semantic, interoperable recognition databases (based on the standards of the ELM).[241]
- Investigating an EU-level tool to produce comparability statements for TCQs.
- Increasing support for the ENIC – NARIC network, particularly concerning vocational education and training (VET) qualifications.
- Including relevant recognition authorities in the Regulated Professions Database.

Furthermore, the Communication presents a vision for modernising qualification recognition by drawing on experiences such as the rapid recognition mechanisms implemented for Ukrainian qualifications and promoting collaboration with networks like ENIC and the European Training Foundation (ETF) to improve understanding of third-country frameworks.

In addition, the Commission has launched **Talent Partnerships** with key partner countries to facilitate **legal labour mobility** to the EU.[242] These Partnerships focus on addressing skill shortages within the EU while providing training and opportunities for individuals from partner countries. As part of these programmes, participants can receive support for **developing and validating formal and non-formal qualifications** relevant to sectors of mutual interest between EU Member States and the partner country. First proposed in 2021,

239 For an overview of these issues, see also: European Commission (2023), Assessment of Commission Recommendation (EU) 2022/554 of 5 April 2022 on the Recognition of Qualifications for People Fleeing Russia's Invasion of Ukraine. Available at: Assessment of Commission Recommendation (EU) 2022/554 of 5 April 2022 on the recognition of qualifications for people fleeing Russia's invasion of Ukraine - Internal Market, Industry, Entrepreneurship and SMEs

240 European Parliament & Council. (2023). COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS on Skills and Talent Mobility. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2023%3A715%3AFIN

241 The European Learning Model is a multilingual data model for learning which can be used to describe all learning related data, including formal, non-formal and informal learning. The model supports data exchange on skills, qualifications, accreditation, and learning opportunities, as well as interoperability and credential exchange.

242 EU Commission *Talent partnerships*. Available at: https://home-affairs.ec.europa.eu/policies/migration-and-asylum/legal-migration-and-resettlement/talent-partnerships_en

they are currently operational with countries such as Morocco, Tunisia, Egypt, Pakistan and Bangladesh.

The **Action plan on Integration and Inclusion 2021-2027** acknowledges the importance of facilitating the recognition and comparability of qualifications and professional experience of TCNs to support them to fully use their skills in the host country.[243] The 2025 mid-term review of the Action plan[244] confirms that progress was made in this area but that overqualification of TCNs is still significantly higher than that of EU nationals and mobile EU citizens.

As regards EU tools supporting the recognition of qualifications, that also apply/are accessible to TCNs (e.g. EQF, IMI System, RPD, Europass, ESCO, European Credit Transfer and Accumulation System (ECTS), EQAVET/ Standards and guidelines for quality assurance in the European Higher Education Area (ESG), Digital credentials), the most relevant tool for TCNs is the **ENIC-NARIC framework**, a joint initiative by the Council of Europe, UNESCO, and the EU aimed at improving the **recognition of academic** and **professional qualifications** across different countries. It brings together the members of the **ENIC** and those of the **NARIC** in the EU from countries that are parties to the **Lisbon Recognition Convention**, creating a cooperative network for fair and transparent recognition procedures.[245] The framework primarily supports the **recognition of higher education qualifications**, such as diplomas, degrees, and periods of study, by promoting common standards, sharing best practices, and providing credential evaluation guidance. Member centres advise individuals, institutions, and public authorities on qualification recognition, helping to ensure consistency, comparability, and mobility within the European Higher Education Area and beyond.[246] Lastly, the **ETF** plays a complementary and enabling role in the EU framework for qualification recognition.[247] As an EU agency supporting neighbouring and partner countries under EU external relations policies, the ETF contributes to improving the transparency, quality, and relevance of education, training, and qualifications systems in third countries. Through its analytical work, capacity building- activities, and cooperation with national authorities, the ETF helps align third country- qualification frameworks with EU reference tools and standards.[248] This work is instrumental for recognition processes, as it strengthens the evidence base on TCQs systems, facilitates mutual understanding between EU and -non-EU authorities, and supports more informed and consistent recognition decisions. In this way, the ETF enhances the EU's ability to harness third country human capital and supports fairer more effective recognition to facilitate mobility towards the EU and labour market integration.

[243] EU Commission. (2020). *Action plan on Integration and Inclusion 2021-2027*. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52020DC0758.
[244] eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52025SC0162
[245] Council of Europe. (1997) *Convention on the Recognition of Qualifications concerning Higher Education in the European Region*, *ETS No. 165*. Available at: https://www.coe.int/en/web/conventions/-/council-of-europe-convention-on-the-recognition-of-qualifications-concerning-higher-education-in-the-european-region-ets-no-165-translations
[246] Available at: ENIC-NARIC - gateway to recognition of qualifications.
[247] ETF. Qualifications and qualification systems. Available at: Qualifications and qualification systems | ETF
[248] ETF. Qualifications and qualification systems. Available at: Qualifications and qualification systems | ETF

Annex 7.3 Validation of skills

Building upon the Council Recommendation of 2012, the validation of skills within the EU has steadily evolved towards more structured, transparent, and effective procedures to validate and consider skills of TCNs. Initially, the focus was on enabling individuals, both EU citizens and TCNs, to have their learning outcomes acquired outside formal education identified, assessed, and certified. This is particularly important because focusing only on the recognition of formal qualifications places significant limits on addressing labour-market shortages that could otherwise be mitigated through the validation of skills acquired outside traditional academic pathways. This provided alternative pathways into employment, further education, and formal qualifications, serving as a bridge for those whose competencies may otherwise be overlooked by traditional systems. Throughout the years Member States have issued legislative and policy initiatives in order to advance the system of validation of skills and align with the 2012 Council Recommendation (see Table 27).

Table 27 - Main legislative and policy initiatives on validation in EU Member States

MS	Main legislative / policy initiatives on validation
AT	Validation Strategy (2017); Lifelong Learning Strategy 2020; amendments to Volunteering Act (2023); sector- and project-based validation initiatives
BE	Decrees on validation and common quality framework (2019); Certificates of Work Experience; integrated regional validation policy Consortium de Validation des Compétences (CDVC); regional decrees; occupational standards developed with social partners
BG	Amendments to Education Law (2022); Employment Promotion Act (2022); integration into skills strategy development
CZ	Act No. 179/2006 on Recognition of Further Education Results (amendment in preparation); Education Strategy 2030+
DE	National Skills Strategy (2019); ValiKom and sectoral initiatives; collective agreements
DK	Adult Education legislation; validation embedded in IVET and CVET; collective agreements
EE	Education Strategy 2021–2035; reform of professional qualifications system; NQF-linked validation
EL	Validation provisions in adult learning and labour market; Individual Skills Accounts Law (2022)
ES	Organic Law 3/2022; Royal Decree 659/2023 on VET system
FI	Continuous Learning Reform (2019–2023); strong legal right to recognition of prior learning
FR	Labour Code & Education Code provisions on VAE; France Compétences (2019); streamlined VAE monitoring (2021)
HR	Adult Education Act (2021); CROQF Act (2021); Volunteering Act (2021); Trades and Crafts Act (2020)
IE	National Skills Strategy 2025; Recognition of Prior Learning embedded in NFQ legislation
IT	Legislative Decree 13/2013; Interministerial Decrees (2021, 2023) on certification of competences
LT	Law on Non-formal Adult Education (2021); VET and HE laws updated (2023)
LU	Lifelong learning framework; Diploma+ scheme
LV	Reform of Vocational Education Law (2022); National Education Strategy 2021–2027
MT	National Strategy for Lifelong Learning 2020–2030; MFHEA governance; validation QA policy (2022)
NL	National EVC framework; labour-market-oriented validation policy
PL	Integrated Skills Strategy 2030; Integrated Qualifications System legislation
PT	Ordinances No. 61/2022 and 62/2022 strengthening Centros Qualifica
RO	National Strategy for Employment 2021–2027; validation centres regulation
SE	Validation Regulation (2022:1549); cross-sector legal definition of validation

MS	Main legislative / policy initiatives on validation
SI	Adult Education Master Plan 2022–2030; validation embedded in adult education
SK	Lifelong Learning and Counselling Strategy 2021–2030; draft Act on Lifelong Learning

Source: Author's elaboration

Nonetheless, validation remains prevalently connected to access to education and further training, and only a limited number of Member States (CZ, DK, FI, FR, IE, NL, PT) have developed comprehensive validation systems that allow non-formal and informal learning to lead directly to the award of full formal qualifications.[249] In most Member States, validation remains primarily partial in nature, with employers detaining substantial roles in validating skills and competences.[250]

Moreover, the move towards **micro-credentials**[251] (i.e. short, targeted learning experiences formally recognised by EU standards) reflects a shift towards granular skill validation. This brings flexibility and responsiveness to evolving labour market needs, allowing for coherent EU-level validation of personalised learning and career pathways, particularly relevant for TCNs seeking swift labour market integration. However, although the Council Recommendation on micro-credentials does not automatically exclude those acquired in third countries, it does not recommend that Member States directly recognise them either, leaving their recognition subject to national law and bilateral agreements. As a result, it does not substantially enhance validation prospects for TCNs.

These initiatives are accompanied by the development of tools and platforms aimed at further delineating the skills validation process by introducing self-assessment tools to digitalise, store and validate skills. The **Europass framework**[252] and its associated **European Digital Credentials for Learning (EDC)**[253] provide a robust platform for individuals to store, present, and share their validated skills and qualifications in a secure digital format. These credentials are designed to be recognised across borders, increasing both transparency and trust in the validation process. While both the Europass and the EDC target both EU Citizens and TCNs, the **EU Skills Profile Tool for TCNs**[254] is a multilingual online tool specifically designed to aid the mapping of skills, qualifications and work experiences of TCNs residing in the EU. Developed in the context of the large number of refugees arriving in 2015/16, the tool has primarily been used in reception centres, by social services and case workers, CSOs and training advisors.

[249] Cedefop (2023). European inventory of validation of informal and non-formal learning 2023. Available at: https://data.europa.eu/doi/10.2801/64271

[250] Targeted interviews with 2 HR departments, 3 EU umbrella organisations and 2 EU professional associations

[251] Council Recommendation of 16 June 2022 on a European approach to micro-credentials for lifelong learning and employability 2022/C 243/02. Available at: EUR-Lex - 32022H0627(02) - EN - EUR-Lex

[252] 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 (Text with EEA relevance). Available at: Decision - 2018/646 - EN - EUR-Lex

[253] Europass. European Digital Credentials for Learning. Available at: European Digital Credentials for Learning. | Europass

[254] European Commission. EU Skills Progile Tool for Third Country Nationals. Available at: Skills profile

Annex 8. Mapping of recognition processes to access regulated professions and as part of migration procedures across the EU Member States

Annex 8.1 Introduction

This annex provides a **comprehensive mapping of qualification checks performed across EU Member States for third-country nationals (TCNs), both in the context of access to regulated professions and within migration admission pathways**. It aims to offer a consolidated overview of how qualifications and skills are assessed, pointing to a **coexistence of the two tracks (**i.e. formal recognition to access regulated professions and qualification checks within migration pathways) **as largely separate and insufficiently coordinated institutional tracks.**

In fact, on the one hand, **formal recognition procedures for access to regulated professions** are governed by professional regulatory frameworks and implemented by competent authorities (CAs). On the other hand, **migration admission procedures** involve qualification and skills checks carried out by migration authorities to assess eligibility for entry and residence, above all in cases of high-skilled migration pathways and schemes.

Scope of the mapping

In terms of scope, this mapping encompasses qualification and skills checks carried out in two specific contexts: (i) **formal recognition procedures required to access regulated professions**, and (ii) **qualification assessments performed within migration admission procedures**. It covers both regulated professional systems and migration-related eligibility checks, with a particular focus on third-country qualifications across the 27 EU Member States. In terms of volumes, the **annual volume of applications** for the recognition of qualifications by TCNs across EU Member States is estimated at around **62.500**. In the absence of a harmonised administrative dataset on TCN recognition, this estimate is based on the triangulation of independent sources of evidence, yielding a convergence interval of 40.000 to 85.000 applications per year, with a central estimate of 62.500. Further details on the methodology are provided in Annex 4.6.

This mapping is informed by a wide range of **sources**, combining survey results, other stakeholder consultations (i.e. targeted interviews, focus groups, public consultation (PC)), and desk research.

The primary source of evidence is the **survey conducted with CAs** across EU Member States (n=190), covering 22 Member States and a wide range of regulated professions. This is complemented by a survey addressed to **ENIC-NARIC centres** across EU Member States (n=18: BE, BG, EE, FI, FR, EL, ES, HU, IE, IT, LT, LV, NO, NL, RO, SE, SI, SK), a survey targeting **labour migration authorities** across 14 Member States (AT, BE, BG, CZ, FR, HU, IE, IT, LT, MT, NL, PL, PT, SE, SK) (n=48), and a **survey targeted at TCNs** (n=155), often combined with data from the PC provided by TCNs, EU Citizens with TCQs (n=99). These surveys provide insights into both recognition systems and qualification checks performed within migration procedures.

The survey targeted at CAs covers a broad set of professions, with responses distributed across sectors as summarised in Table 1 below. Healthcare professions are particularly well

represented (e.g. dentists, nurses, pharmacists, doctors, midwives), alongside a diverse range of technical, industrial and service professions.

Table 28 - Member States and professional coverage from the survey targeted at CAs[255]

Type of professions	Number of responses	Member States covered
Healthcare assistants	28	12 (AT, HR, DE, HU, IE, LT, MT, PT, RO, ES, SE, NL)
Dentists	24	14 (AT, BE, DE, EE, ES, FI, HR, LT, MT, NL, PT, SE, SI, SK)
Midwives	24	14 (BE, HR, EE, FI, DE, LT, NL, PL, PT, SK, SI, ES, SE, IE)
Nurses	24	14(BE, HR, EE, FI, DE, LT, NL, PL, PT, SK, SI, ES, SE, IE)
Pharmacists	24	15 (AT, BE, HR, EE, FI, DE, LT, MT, NL, PL, PT, SK, SI, ES, SE)
Doctors	21	12 (BE, HR, EE, FI, DE, LT, MT, NL, SK, SI, ES, SE)
Accountant and tax advisors	20	10 (AT, HR, FR, IT, LT, LU, MT, RO, SI, SE)
Caregivers	18	7 (AT, DE, IT, MT, PT, SE, NL)
Manufacturing, Craft & Industrial Trades (e.g. manufacture and retail of various products including clothing)	15	6 (AT, HU, IT, LU, MT, PL)
Transport, Mobility & Logistics (e.g. drivers, international shipping, maritime officers)	14	8 (AT, BE, FI, IT, LV, PL, RO)
Engineering & Technical Professions (e.g. operation and construction managers, electrotechnical and ICT, aeronautical and aerospace)	14	11 (AT, EE, FI, FR, LV, LU, PL, PT, RO, SI, ES)
Psychology/psychotherapy	14	11 (HR, FR, DE, IE, LT, MT, NL, PT, RO, ES, SE)
Veterinary	14	10 (AT, DE, HU, LV, LT, MT, NL, RO, ES, SE)
Architects	13	12 (AT, HR, EE, FI, LT, LU, PL, PT, RO, SI, ES, MT)
Construction & Installation Trades (e.g. crane operators, builders, installations of sanitation, electrical, conditioning and plumbing systems)	14	6 (AT, HU, IE, IT, MT, NL, SE)
Education and teaching (e.g. schoolteachers, childcares, principals and school personnel)	13	10 (AT, FI, HU, IE, LT, PT, RO, SI, ES, SE)
Legal professions (e.g. attorneys, judges , judicial technical experts, notaries)	10	7 (IE, LV, NL, PT, RO, SI, ES)
Social Workers and social care	8	5 (AT, FI, HU, LT, MT)
Security	7	6 (AT, FI, IE, LT, MT, PL)
Electricians	8	4 (AT, HU, MT, SE)
Sport instructors	4	4 (FR, IT, LT, PT)

Source: Author's elaboration based on the survey targeted at CAs

In addition, survey results have been complemented with findings from targeted consultation activities, including **five focus groups** involving CAs in the healthcare sector; CAs responsible for crane operators and electricians; ENIC-NARIC centres and Public Employment Services (PES); TCNs; and labour migration authorities and international

[255] In addition to these professional categories there are 30 responses in which CAs did not indicate clearly the type of professions for which they regulate access

organisations (IOs), providing their perspectives on both recognition procedures and migration-related qualification checks.

Table 29 – Focus Groups

Focus groups	Participants	MS covered
CAs in Healthcare	32	15 (AT, BE, EE, ES, FI, HR, IE, LT, LU, MT, NL, PL, RO, SE, SI)
CAs in the field of crane operators and electricians	20	12 (AT, CZ, HR, EE, ES, FI, IT, LT, LU, MT, NL, SE)
ENIC-NARIC and PES	38	20 (BE, BG, DE, EL, ES, FI, FR, IE, IT, LI, LT, LU, LV, MT, NL, NO, PT, RO, SE, SI)
TCNs	12	n.a.
Labour Migration Authorities and IOs	28	

Source: Author's elaboration

These primary data sources are triangulated with **desk research**, including relevant EMN ad hoc queries, Migration Policy Foundation (MPF) case studies and mappings, and **targeted interviews** with civil society organisations (CSO), IOs and other stakeholders.

The combined use of these sources allows for a robust and comparative mapping of both **formal recognition systems** and **qualification assessments within migration pathways** across Member States. In particular, the analysis captures differences in procedural design, institutional responsibilities, and the degree of coordination between actors.

An Overview of the structure of the mapping

The annex provides a comprehensive overview of qualification recognition and related checks across Member States. It first examines the **recognition of qualifications for TCNs seeking access to regulated professions**, including differences in the treatment of TCNs compared to EU citizens holding EU qualifications. It also covers key procedural aspects such as cooperation between CAs and other relevant bodies, documentation requirements and compensation measures, associated costs and timelines, the degree of digitalisation, differential treatment of vulnerable groups, and the availability of information and support to applicants.

This is followed by a second section focusing on **qualification checks carried out within migration procedures**, often as part of eligibility assessments for highly skilled migration schemes. This section analyses the scope of such checks, differences between regulated and non-regulated professions, the methods applied, as well as the associated timelines and costs.

The mapping concludes with an **assessment of the overall burden borne by TCNs**, including estimated average timelines and costs, and considers how these relate to recognition outcomes. The analysis indicates that, while recognition procedures impose a moderate, non-negligible financial and time burden, they do not consistently translate into favourable recognition decisions or improved labour market outcomes, pointing to structural inefficiencies in the system.

Annex 8.2 Recognition of qualifications for access to regulated professions

Annex 8.2.1 Differentiated regimes — how TCN procedures differ from EU citizen procedures

This section provides an overview of the differences applied in the recognition of qualifications and validation of skills of TCNs, compared to those applicable to nationals of EU Member States with EU qualifications. Overall, evidence clearly shows that the **all Member States covered apply differentiated recognition regimes for TCQs**, resulting in **systematically higher procedural barriers for TCNs**.[256] Logically, evidence shows that this pattern is particularly pronounced in **regulated professions with automatic recognition and under the MRT** for EU citizens with EU qualifications, including **in the healthcare sector**.[257] In practice TCNs can often face additional examinations, longer and more complex recognition pathways, and earlier or more stringent language requirements in comparison with EU nationals.[258]

Indeed, around half of CAs responding to the survey (50,5%) explicitly stated that **recognition procedures differ for TCNs compared to EU citizens**, including differences in **deadlines**, **documentation requirements**, **appeal rights** and **compensation measures**. These differences were reported across 19 Member States (AT, BE, HR, EE, FI, FR, DE, HU, IE, IT, LV, MT, NL, PL, PT, RO, SI, ES, SE) and across multiple professions, including healthcare assistants, personal care workers, dentists, pharmacists, doctors, nurses, midwives, psychologists, architects, engineers, teachers, social workers, veterinary professionals, transport and logistics professionals, construction and installation trades, and others (see

Figure 5).[259]

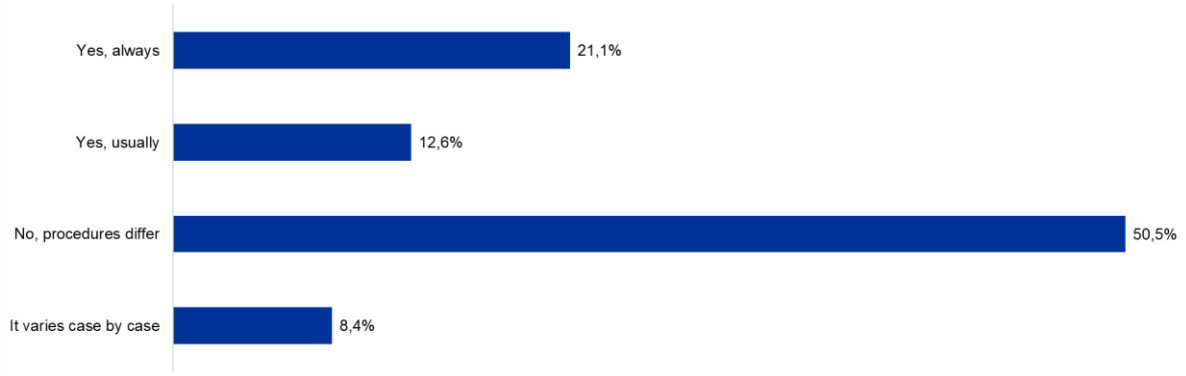
[256] Survey targeted at CAs, Q.5: “Does your legal framework require the same recognition procedures for third-country applicants with TCQs and EU/EEA applicants with EU/EEA qualifications (e.g. deadlines, documentation requirements, appeal rights, compensation measures)?” (n=190); Survey targeted at CAs; Q5.a: “If not, how do the procedures for recognition of TCQs held by third-country nationals differ from those applied to EU/EEA applicants with EU/EEA qualifications?” (n=96), open question.

[257] Focus Group with CAs in the healthcare sector (n=31); Note that responses from CAs differ depending on whether they cover sectoral/MTR professions (e.g. doctors) or professions under the PQD general system. For MTR professions, longer and more burdensome procedures for TCNs are expected, as automatic recognition does not apply and training is not harmonised. Therefore, CAs in these fields maintain differentiated regimes for TCNs.

[258] Survey targeted at CAs; Q5.a: “If not, how do the procedures for recognition of TCQs held by third-country nationals differ from those applied to EU/EEA applicants with EU/EEA qualifications?” (n=96), open question; and “Q6.a. If yes, in what way do they differ? (Select all that apply) (n=13), open question.

[259] Survey targeted at CAs, Q.5: “Does your legal framework require the same recognition procedures for third-country applicants with TCQs and EU/EEA applicants with EU/EEA qualifications (e.g. deadlines, documentation requirements, appeal rights, compensation measures)?” (n=190), Yes, always (21,1%), Yes, usually (12,6%), No, procedures differ (50,5%), It varies case by case (8,4%), Not sure (7,4%).

Figure 5 - Does your legal framework require the same recognition procedures for third-country applicants with TCQs and EU/EEA applicants with EU/EEA qualifications (e.g. deadlines, documentation requirements, appeal rights, compensation measures)? (n=190)



Source: Author's own elaboration based on the survey targeted at CAs

As shown in the figure above, only 20,9% of CAs responding to the survey indicated that recognition procedures applied to TCNs are the same that are applied to EU citizens. These include CAs responsible for a wide variety of different professions as listed below (see Table 30):[260]

In terms of variance of recognition procedures across different professions, the table below provides an overview of the different procedures for professions subject to **automatic recognition under the PQD for EU Citizens** (i.e doctors, nurses responsible for general care, dentists, veterinary surgeons, midwives, pharmacists and architects) and all the other professions.

Table 30 -Does your legal framework require the same recognition procedures for third-country applicants with third-country qualifications and EU/EEA applicants with EU/EEA qualifications (e.g. deadlines, documentation requirements, appeal rights, compensation measures)? (n=190)

Profession	It varies case by case	No, procedures differ	Not sure	Yes, always	Yes, usually
Doctors		15 (DE, EE, ES, FI, HR, MT, NL, SE)			3 (DE, LT, SK)
Nurses		14 (DE. EE. ES, FI, HR, NL, PL, PTSE)	1 (NL)	1 (DE)	4 (DE, LT, SK)
Dentists		18 (AT, DE, EE, ES, FI HR, MT, NL, PT, SE)			3 (DE, LT, SK)
Veterinary		10 (DE, ES, HU, LV, MT, NL, RO, SE)		1 (AT)	1 LT
Midwives	1 (HR)	9 (DE, EE, FI, PL, PT)			4 (DE, LT, SK)
Pharmacists		17 (AT, BE, DE, EE, FI, HR, MT, NL, PL, PT, SE, SI)		1 (LT	2 (DE, SK)

[260] Survey targeted at CAs, Q.5: "Does your legal framework require the same recognition procedures for third-country applicants with TCQs and EU/EEA applicants with EU/EEA qualifications (e.g. deadlines, documentation requirements, appeal rights, compensation measures)?" (n=190)

Profession	It varies case by case	No, procedures differ	Not sure	Yes, always	Yes, usually
Architects	2 (AT)	7 (ES, FI, HR, PL, PT, SI)		1 (LU	3 (EE, LT, RO)
Other professions	13 (IT, RO, MT, PT)	56	14	34	16

Source: Author's own elaboration based on the survey targeted at CAs

As shown in Table 30, **procedures for the recognition of qualifications tend to differ more frequently for professions covered by the automatic recognition regime under the PQD** (i.e. namely doctors, nurses responsible for general care, dentists, midwives, pharmacists, and veterinary surgeons) when comparing those applied to EU citizens and TCNs.[261] While EU citizens benefit from automatic recognition based on harmonised minimum training requirements, TCNs are generally subject to separate assessment procedures, which leads CAs to apply different processes in a majority of reported cases.

At the same time, the results highlight substantial heterogeneity not only **across Member States**, but also **within Member States**, reflecting variations in administrative organisation (e.g. federal or regional competence), institutional practices, and interpretation of procedural rules. For instance, Germany provides a particularly illustrative example: some regional CAs responsible for doctors (n=1), dentists (n=1), pharmacists (n=1), as well as some responsible for nurses (n=3) and midwives (n=2), report that procedures are *usually the same* (or even always the same in one instance of nurses in DE) for EU and third-country qualifications. In contrast, a larger number of authorities (i.e. five CAs for midwives, four CAs for doctors, for CAs, for dentists, four CAs for pharmacists and three CAs for nurses) overseeing the same professions indicate that procedures *always differ*.

This divergence within a single Member State suggests that **implementation remains decentralised and not fully standardised**, pointing to the absence of a uniform approach in handling TCN qualifications, even within the same professional groups.

Conversely, among respondents who identified differences between procedures for EU citizens and TCNs, the most frequently cited elements were:

- the **existence of additional requirements for TCNs**: 66 CAs in 19 Member States (AT, BE, HR, EE, ES, FI, FR, DE, HU, IE, IT, LV, MT, NL, PL, PT, RO, SI, SE);
- **differences in applicable deadlines**: 33 in 12 Member States (AT, HR, EE, ES, FI, DE, HU, IE, MT, NL, RO, SE);
- differences in available **compensation measures**: 30 CAs in 13 Member States (AT, HR, FI, FR, DE, ES, HU, IE, IT, MT, NL, SI, SE);
- the requirement of a **prior formal recognition statement by another body,** such as an ENIC- NARIC centre: 26 CAs in 11 Member States (AT, BE, HR, EE, ES, DE, MT, NL, PT, RO, SI). [262]

Focusing on the profession of doctors with basic medical training, differences between the recognition procedures for EU citizens with EU qualifications and TCNs are particularly

[261] Survey targeted at CAs, Q.5: "Does your legal framework require the same recognition procedures for third-country applicants with TCQs and EU/EEA applicants with EU/EEA qualifications (e.g. deadlines, documentation requirements, appeal rights, compensation measures)?" (n=190)

[262] Survey targeted at CAs, Q5.a: "If not, how do the procedures for recognition of TCQs held by third-country nationals differ from those applied to EU/EEA applicants with EU/EEA qualifications?" (n=96)

pronounced, as evidenced by the EMN ad hoc query on the recognition of third-country qualifications.[263] Almost all Member States (AT, BE, BG, CY, CZ, DE, EE, EL, ES, FI, FR, HR, HU, LT, LU, LV, MT, NL, PL, SE, SI, SK) report **clear differences in recognition requirements between medical qualifications obtained in third countries and those obtained in another EU Member State**.[264] Across all cases, in line with evidence stemming from the survey targeted at CAs, these differences translate into **additional or more burdensome requirements for TCNs**, while EU qualifications benefit from automatic or simplified recognition under Directive 2005/36/EC.[265] A key feature across Member States is the provision of **mandatory compensation measures and professional examinations for the recognition of TCNs qualifications.** In total, 18 Member States (AT, BG, CY, CZ, DE, EE, EL, ES, FI, FR, HU, LV, MT, NL, PL, SE, SI, SK) require TCNs to pass **knowledge tests, aptitude tests, state medical examinations, supervised practice periods or skills-consolidation programmes** as a condition for recognition or authorisation to practise.[266] In several cases, these measures involve **substantial reassessment of medical competence** and extend over **multi-stage pathways combining exams, internships and restricted or supervised practice rights** (notably FI, FR, NL, SE).[267] Such compensation measures are generally **not required for EU medical qualifications**, which are recognised automatically or through significantly lighter procedures.

In parallel, 11 Member States (AT, BE, CY, EL, HR, HU, LV, LT, NL, SK, SI) require TCNs to undergo **academic recognition or nostrification** of their medical degree.[268] This process typically involves detailed comparisons of curricula, content, duration of studies and learning outcomes and applies **exclusively to TCQs**, as EU qualifications fall under EU mutual recognition rules. In some cases, successful academic recognition is a **precondition for accessing professional recognition procedures or sitting further exams**.

Another widespread source of differentiation relates to **language requirements**, which are frequently applied **earlier or more strictly to TCNs**. At least **16 Member States** (AT, BG, CZ, FI, FR, DE, HU, LT, MT, NL, PL, SI, SK, ES, SE, LV) require proof of proficiency in the national language as part of the recognition or authorisation process for TCNs, often through medical-specific language examinations (for example, C1 level in DE and B2–B2+ levels in AT, ES, FR, NL, SE).[269] By contrast, for EU qualifications, language checks typically apply only at later stages, such as professional registration or employment, and do not form part of the recognition procedure as such.

Several Member States (FI, FR, NL, SE, CZ, PL, SK) further report **multi-stage recognition pathways** applicable to TCNs, combining academic assessment, exams, supervised

[263] EMN, 2024. Ad-Hoc Query 2024.16 on Recognition of third-country qualifications for the profession of doctor with basic medical training.
[264] EMN, 2024. Ad-Hoc Query 2024.16 on Recognition of third-country qualifications for the profession of doctor with basic medical training; Survey targeted at CAs, Q.5: "Does your legal framework require the same recognition procedures for third-country applicants with TCQs and EU/EEA applicants with EU/EEA qualifications (e.g. deadlines, documentation requirements, appeal rights, compensation measures)?" (n=190)
[265] EMN, 2024. Ad-Hoc Query 2024.16 on Recognition of third-country qualifications for the profession of doctor with basic medical training.
[266] EMN, 2024. Ad-Hoc Query 2024.16 on Recognition of third-country qualifications for the profession of doctor with basic medical training. Survey targeted at CAs, Q5.a: "If not, how do the procedures for recognition of TCQs held by third-country nationals differ from those applied to EU/EEA applicants with EU/EEA qualifications?" (n=96)
[267] EMN, 2024. Ad-Hoc Query 2024.16 on Recognition of third-country qualifications for the profession of doctor with basic medical training. Survey targeted at CAs, Q5.a: "If not, how do the procedures for recognition of TCQs held by third-country nationals differ from those applied to EU/EEA applicants with EU/EEA qualifications?" (n=96)
[268] EMN, 2024. Ad-Hoc Query 2024.16 on Recognition of third-country qualifications for the profession of doctor with basic medical training. Survey targeted at CAs, Q5.a: "If not, how do the procedures for recognition of TCQs held by third-country nationals differ from those applied to EU/EEA applicants with EU/EEA qualifications?" (n=96)
[269] EMN, 2024. Ad-Hoc Query 2024.16 on Recognition of third-country qualifications for the profession of doctor with basic medical training. Survey targeted at CAs, Q5.a: "If not, how do the procedures for recognition of TCQs held by third-country nationals differ from those applied to EU/EEA applicants with EU/EEA qualifications?" (n=96)

practice, temporary or restricted licences and final authorisation.[270] These staged procedures substantially lengthen the time required for TCNs to access full professional practice and do not apply to EU-qualified doctors.

For example, Luxembourg represents the most restrictive approach, where recognition of **basic medical training obtained in a third country is not admissible**, meaning that TCNs holding only basic medical training cannot access recognition procedures at all, whereas EU qualifications listed in Annex V of Directive 2005/36/EC are recognised automatically.[271]

Finally, in a number of Member States (BG, PL, SI, ES), legal frameworks **explicitly distinguish between EU and non-EU qualifications**, introducing additional requirements for TCNs related to residence status, scope of practice, language certification or temporary authorisations that do not apply to EU nationals.[272]

Overall, the analysis confirms that **differentiated recognition regimes for TCNs are the norm rather than the exception**, particularly in highly regulated professions such as doctors. Even where legal frameworks for recognition appear formally the same between TCNs and EU citizens with EU qualifications, **practical implementation of recognition procedures often results in additional procedural steps such as mandatory compensation measures, stricter language requirements, temporary authorisations and supervised practices** reinforcing structural differences in access to regulated professions across the EU.

Building on the existing differences between the procedures for the recognition of qualifications for TCNs and EU citizens, the sections below provide a substantial mapping of existing rules and procedures (i.e. documentation and formal requirements, compensation measures, processing timelines and costs, degree of digitalisation, authenticity checks and differential treatment for vulnerable groups of TCNs). Additionally, the section below maps the availability of information for TCNs across EU MS, as well as the cooperation with other bodies within and between MS, as well as with third countries.

Annex 8.2.2 Cooperation — within Member States, between Member States, and with third countries

The level of co**operation between CAs responsible for the recognition of professional qualifications and other relevant bodies** (e.g. other national recognition or professional bodies and regulators, awarding institutions, education and training authorities, employers and sectoral bodies) varies significantly depending on the geographical scope of that cooperation. This section highlights that, while a majority of **CAs cooperate with other authorities within their own Member State**, this share decreases greatly with regard to cooperation with authorities in other Member States and declines further when cooperation with relevant authorities in third countries is considered.

Indeed, a majority of CAs report cooperation with other **recognition and professional authorities** (61.6%) and with **education and training authorities** (53.7%) **within their own Member State**.[273] This suggests that, in most cases, cooperation structures are well established at national level and embedded within existing administrative ecosystems.

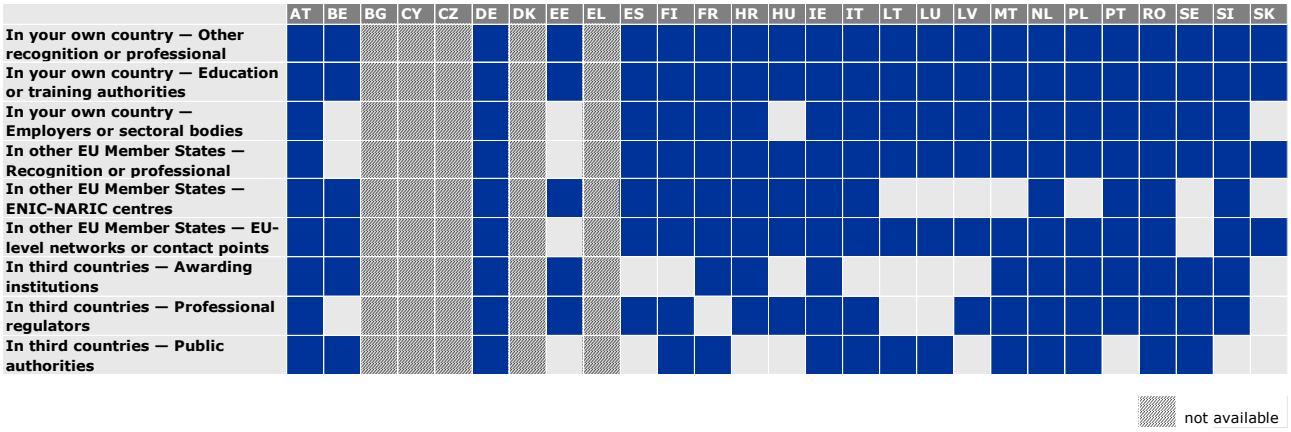
[270] EMN, 2024. Ad-Hoc Query 2024.16 on Recognition of third-country qualifications for the profession of doctor with basic medical training.
[271] EMN, 2024. Ad-Hoc Query 2024.16 on Recognition of third-country qualifications for the profession of doctor with basic medical training.
[272] EMN, 2024. Ad-Hoc Query 2024.16 on Recognition of third-country qualifications for the profession of doctor with basic medical training.
[273] Survey targeted at CAs, Q31. “Do you cooperate with any of the below organisations on cases involving TCQs? (Select all that apply)” (n=190)

By contrast, **cooperation between Member States remains more fragmented and uneven**. Only a minority of CAs report systematic cooperation with counterparts in other EU Member State, whether with **recognition or professional authorities** (43.7%), **ENIC-NARIC centres** (20.5%), or **EU-level networks** (23.7%). This indicates that cross-border administrative cooperation, despite the relevance of cross-border qualification pathways for TCNs, has not yet been consistently institutionalised.[274]

Engagement with **third-country authorities is even more limited and largely ad hoc**. Where such cooperation exists, it primarily involves **public authorities** (30%), **professional regulators** (23.2%), and **awarding institutions** (18.9%). This pattern suggests that information-sharing and coordination with third countries remain constrained, potentially limiting the ability of CAs to efficiently assess TCQs and skills and contributing to procedural complexity and longer recognition timelines.[275]

A more detailed breakdown of these cooperation patterns across Member States is presented in the figure below.

Figure 6 - Do you cooperate with any of the below organisations on cases involving TCQs? (Select all that apply) (n=190)



Source: Author's own elaboration based on the survey targeted at CAs

When such cooperation happens, the most widespread reasons encompass the **verification of the authenticity of documents** (34,2% - AT, BE, HR, EE, FI, DE, HU, IE, IT, LV, LT, LU, MT, NL, PL, PT, RO, SI, SE), an assessment of **comparability of qualifications** (22,1% - AT, BE, HR, FR, DE, HU, IT, LV, LT, MT, NL, PL, PT, RO, SI, SE) and to a minor extent the **need to clarify professional standards** (10,5% - AT, FI, FR, IE, IT, LV, LT, MT, NL, PL, PT, RO, SI, ES) and **handling complex or exceptional cases** (6,8% - AT, BE, HR, FR, DE, IE, LT, NL, PL, RO, ES).[276]

As mentioned above, bilateral action by individual EU Member States vis-à-vis third countries in the area of qualification recognition exists, but it spans distinct categories that differ in legal nature, degree of reciprocity and policy function.

On the one hand, there are **Mutual Recognition Agreements (MRAs) on professional qualifications**. These are formal, reciprocal and legally structured arrangements whereby two jurisdictions agree on the recognition of specific professional qualifications, based on

[274] Survey targeted at CAs, Q31. "Do you cooperate with any of the below organisations on cases involving TCQs? (Select all that apply)" (n=190)
[275] Survey targeted at CAs, Q31. "Do you cooperate with any of the below organisations on cases involving TCQs? (Select all that apply)"- (n=190)
[276] Survey targeted at CAs, Q31. "What is the main purpose of this cooperation? (Select all that apply)" (n=190)

detailed comparisons of education, training and professional standards. MRAs establish mutual obligations, may include compensation measures, and typically grant a predictable and structured pathway to professional practice for covered professions.

Such agreements are exceptional in the EU context. **The France–Québec Accord**[277] remains the clearest and most advanced example, providing an intergovernmental framework under which profession-specific MRAs have been concluded (e.g. engineers, nurses, architects, lawyers). The key analytical features of MRAs are reciprocity, legal symmetry and durability, which sharply distinguish them from other bilateral approaches observed among Member States.

More frequently, Member States rely **on bilateral or country-specific facilitation mechanisms** that do not constitute MRAs. These mechanisms are unilateral in legal terms: **recognition decisions remain fully national, and no reciprocal recognition rights are created**. Their primary function is not to harmonise standards, but to simplify, accelerate or make more predictable existing recognition procedures, often in response to labour shortages. Such facilitation mechanisms typically rest on:

- **sustained cooperation with authorities or institutions in countries of origin;**
- **repeated exposure to "frequently-seen" qualifications;**
- **accumulated trust in certain education and training systems;**
- **alignment with migration or workforce policies.**[278]

Examples include:

- **Ireland's accelerated pathways for doctors and nurses** from selected third countries (e.g. Philippines and India), grounded in long-standing recognition practice and consistently positive outcomes;[279]
- **Latvia's simplified procedures for medical doctors and dentists** trained in a predefined list of trusted third countries;[280]
- **Italy's pragmatic recognition pathways**, including Article 23 procedures, where cooperation with countries of origin, particularly with Tunisia, supports recognition readiness without creating reciprocal obligations.[281]

These mechanisms can deliver significant efficiency gains, but they fundamentally differ from MRAs in that they lack reciprocity, binding mutual commitments and a shared legal recognition framework.

A third category covers **bilateral initiatives** that are not recognition arrangements as such, but that influence recognition outcomes indirectly. These initiatives focus on skills development, training alignment or labour-migration preparedness, rather than on the

[277] Agreement Between Québec and France on the Mutual Recognition of Professional Qualifications, 2008. Available at: Québec-France agreement on the recognition of professional qualifications (This document does not have official value)
[278] Internal source gathering evidence on the recognition of qualifications of TCNs provided by DG EMPL
[279] NMBI registry. Available at: NMBI - NMBI; Focus Group with CAs in the healthcare sector (n=31); Focus Group on information and support to TCNs with ENIC NARIC centres, PES and CSOs (n=28); Internal source gathering evidence on the recognition of qualifications of TCNs provided by DG EMPL.
[280] World Directory of Medical Schools. Available at: World Directory of Medical Schools
[281] Focus group on attracting talent with HR departments and talent partnerships stakeholders (n= 27); Focus group on labour migration with migration authorities and IOs (n=28). Targeted interviews with one TC authority and one IO.

recognition decision itself. They therefore sit outside qualification-recognition frameworks, even though they may reduce future recognition barriers.

Examples include:

- **Global Skills Partnerships,** most prominently implemented by **Germany**, which align training curricula and language preparation in countries of origin with destination-country standards to ensure recognition readiness post-migration;[282]
- **VET-focused cooperation** between Member States such as Austria and Western Balkan countries, aimed at capacity building and labour-market integration;[283]
- **Academic recognition agreements**, for instance between Spain and Latin American countries or Portugal and Brazil, which primarily address degree recognition and may facilitate, but do not grant, access to regulated professions.[284]

These initiatives do not harmonise recognition criteria and do not confer rights to practise regulated professions. Their relevance lies in tackling upstream barriers, not in replacing or modifying recognition frameworks.

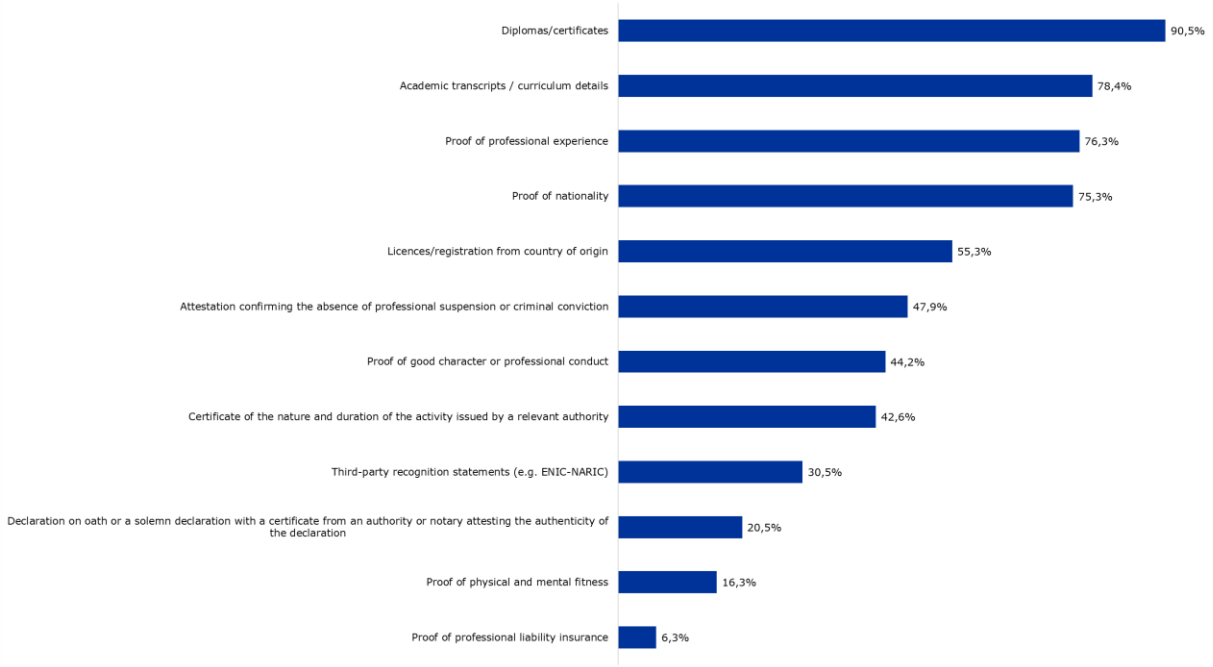
Annex 8.2.3 Documentation and formal requirements

This section provides an overview of the **main documentation requirements**, (i.e. main documents and evidence to be submitted in order to apply to the recognition of qualifications), and formal requirements governing the submission of documents, including the need for certified translation and legalisation or apostille of documents, as well as the format of evidence to be submitted (i.e. digital or paper-based).

Documentation requirements constitute a central component of application procedures for TCNs seeking access to regulated professions. As shown in figure below, the documents that are most commonly required by CAs are: **diplomas/certificates** (90,5%), **academic transcript and curriculum details** (78,4%), **proof of professional experience across Member States (76,3%).** In particular, **diplomas and certificates are requested in almost all cases** reflecting the foundational role of formal qualifications in access professions. This is followed by **academic transcripts and curriculum details**, which are required by 78,4% of surveyed CAs, and **proof of professional experience** required by 76,3%, both of which are key elements used to assess the content, level, and duration of education and training completed outside the EU. **Proof of nationality is also commonly requested** (75,3%), underlining its relevance for determining the applicable legal framework and, in some cases, eligibility to apply.[285]

[282] Global Skill Partnerships. Available at: Home - Global Skill Partnerships
[283] Federal Ministry of the Republic of Austria, 2024. Regional Strategy of the Austrian Development Cooperation with the Western Balkans 2025 – 2027. Available at: Regional Strategy of the Austrian Development Cooperation with the Western Balkans_2025-2027_neu.indd
[284] Focus Group on information and support to TCNs with ENIC NARIC centres, PES and CSOs (n=28);
[285] Survey targeted at CAs, Q10: “Which documents are typically required from third-country applicants? (Select all that apply)” (n=190)

Figure 7 - Which documents are typically required from third-country applicants? (Select all that apply) (n=190)[286]



Source: Author's own elaboration based on the survey targeted at CAs

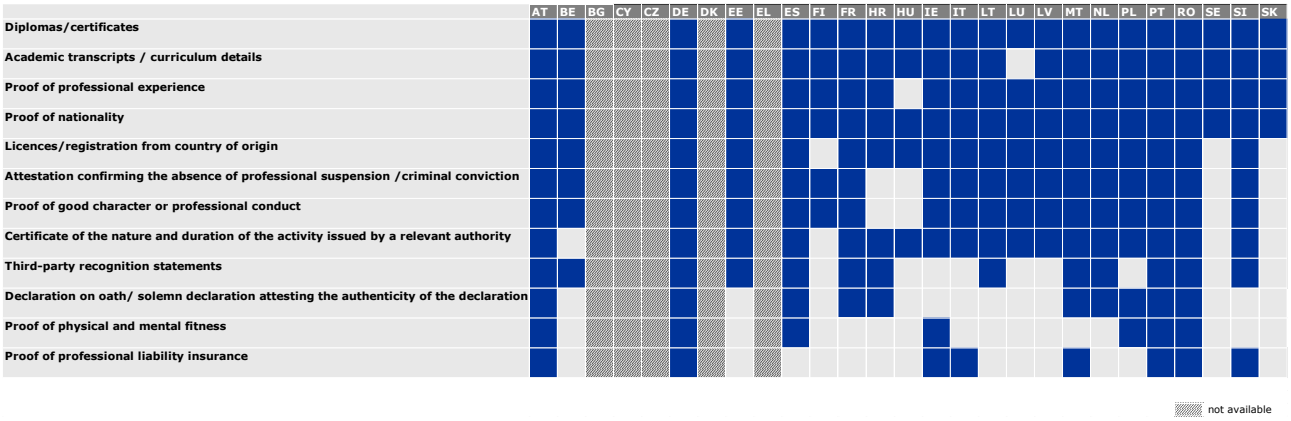
Beyond these core documents, around half of surveyed CAs indicated that applicants need to submit **additional supporting evidence** to assess the applicant's professional standing, integrity, and compliance with regulatory requirements to access a regulated profession[287] such as **licenses or professional registrations from the country of origin** (55,3%), **attestations confirming the absence of professional suspensions or criminal convictions** (47,9%), **proof of good character and professional conduct** (44,2%) and **certificates attesting to the nature and duration of professional activity** (42,6%). Overall, recognition procedures typically require around six supporting documents per application across Member States (approximately 5.8–6.1 depending on whether additional or country-specific requirements are included).[288]

It is less frequent that CAs require the following documents: **third-party recognition statements** (30,5%), such as assessments issued by ENIC-NARIC centres. A smaller share of CAs request **sworn or solemn declarations** attesting to the authenticity of documents (20,5%), **proof of physical or mental fitness** (16,3%), or evidence of **professional liability insurance** (6,3%). These requirements appear to be more sector-specific or linked to professions involving health, safety, or risk-related responsibilities.[289]

The table below shows how documents requirements vary across Member States.

[286] Survey targeted at CAs, Q10: "Which documents are typically required from third-country applicants? (Select all that apply)" (n=190)
[287] Survey targeted at CAs, Q10: "Which documents are typically required from third-country applicants? (Select all that apply)" (n=190)
[288] The average number of required documents per application was estimated by summing, across all document types, the share of cases in which each document is required and dividing the result by 100. Each percentage in the table represents the proportion of observations (n = 190) in which a given document is requested and can therefore be interpreted as the probability that this document is required in a typical procedure. By aggregating these probabilities across all document types, the calculation yields the expected number of documents requested per application. Applying this method results in an average of approximately 6.1 documents per case. This estimate should be interpreted as an approximation, as it assumes independence across document requirements and does not account for potential systematic co-occurrence between specific documents.
[289] Survey targeted at CAs, Q10: "Which documents are typically required from third-country applicants? (Select all that apply)" (n=190)

Figure 8 – Documents requirements across Member States[290]



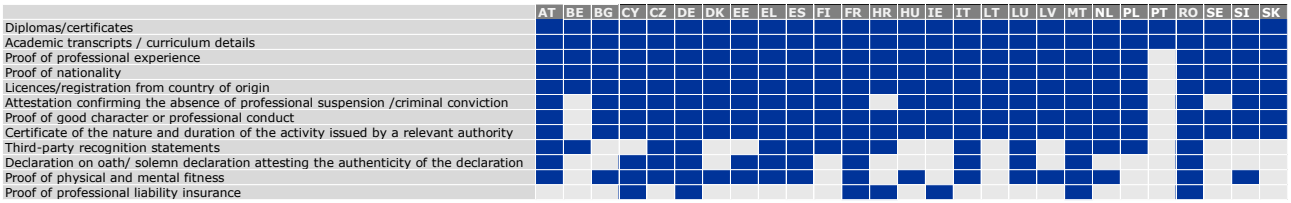
Source: Author's own elaboration based on the survey targeted at CAs

Documentation requirements vary depending on the type of profession concerned. For instance, taking into account relevant professions, i.e. doctors, nurses and midwifes) the type of document requirements vary across Member States.

Overall, to access the professions of nurses (Figure 10) and midwifes (Figure 10) a batch of documents (e.g. **diplomas/certificates; academic transcripts/curriculum details; proof of professional experience; proof of nationality; licences/registration from the country of origin are required in all almost Member States for both nurses and midwives)** are required across all Member States with very few exceptions including proof of professional experience, nationality and licenses from the country of origin in PT for both nurses and midwives, academic transcripts and licenses for midwives in LT and the proof of nationality for midwives in ES (see figure below).

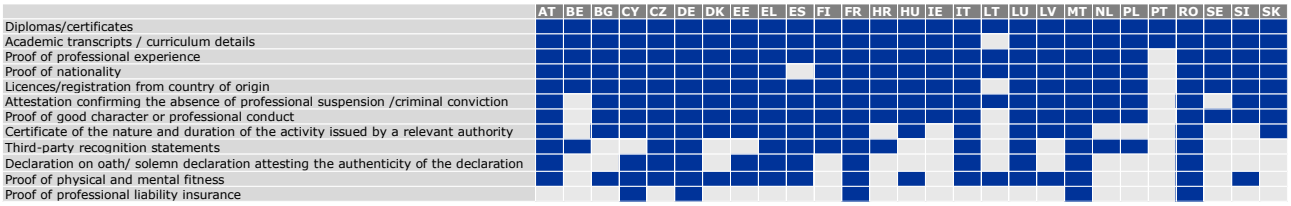
[290] It has to be remarked that within the same MS some type of documents might be required for a certain profession while it might be not required for other professions. Indeed, this information is based on survey data gathering responses from different CAs often coming from the same MS (see section 1 for a breakdown on number of responses per type of profession and MS). In this table, we flagged with a blue cell MS in which a type of document is required at least by one of the CAs consulted through the survey.

Figure 9 – Overview of documents required for nurses across Member States



Source: Author's own elaboration based on websites of national CAs and survey targeted at CAs

Figure 10 - Overview of documents required for midwives across Member States

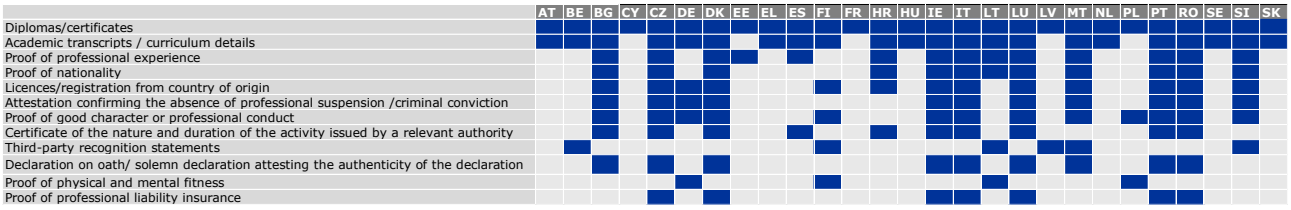


Source: Author's own elaboration based on websites of national CAs

Additionally, proof of physical and mental fitness is required in almost all Member States for both professions. The only exceptions encompass three Member States (BE, PT, SE) where such requirements do not apply to either profession, and Croatia, where the requirement does not apply to nurses. Beyond these core documents, requirements vary across Member States: **third-party recognition statements are required in 15 Member States for both nurses and midwives**, (AT, BE, CZ, DE, EL, ES, FI, FR, HR, IE, IT, LU, MT, NL, PL, RO); a declaration on **oath/solemn declaration on authenticity in 12 Member States for both professions** (AT, CY, CZ, DE, EE; EL, ES, FR, IT, LU, MT, RO); and **professional liability insurance in seven Member States for nurses** (CY, DE, FR, HR, IE, MT, RO) and in **six for midwives** (CY, DE, FR, IE, MT, RO).[291]

As concerns doctors, evidence provides a slightly different picture, as showcased by the figure below.

Figure 11 - Overview of documents required for doctors across Member States



Source: Author's own elaboration based on the survey targeted at CAs, EMN AHQ[292] and national websites of CAs

Similarly to nurses and midwives, a first cluster of requirements for doctors with basic medical training relates to verification of formal qualifications and training content. **Diplomas or certificates** are required by **all Member States**, forming the universally applied backbone of the recognition dossier. In addition, **academic transcripts or detailed curriculum information** are requested by a wide majority of Member States, although not uniformly across all Member States (AT, BE, BG, CY, CZ, DE, DK, EE, EL, ES, FI, FR, HR, HU, IE, IT, LT, LU, LV, PL, PT, RO, SE, SI, SK). This indicates that most authorities go

[291] This information was retrieved from websites of national CAs across Member States and the survey targeted at CAs.

[292] EMN, 2024. Ad-Hoc Query 2024.16 on Recognition of third-country qualifications for the profession of doctor with basic medical training.

beyond confirmation of the final qualification and assess the **content and structure of training** when examining applications.

About half or slightly less than half of Member States also require evidence that the applicant is legally entitled to practise and has exercised the profession. **Proof of professional experience** is requested in a substantial but more selective group of Member States (BG, CZ, DK, EE, ES, HR, IE, IT, LT, LU, MT, PT, RO, SI), **proof of nationality** (BG, CZ, DK, HR, IE, IT, LT, LU, MT, PT, RO, SI), as well as **licence or registration from the country of origin** is required by many Member States (BG, CZ, DE, DK, FI, HR, IE, IT, LT, LU, MT, PT, RO, SI), reflecting the relevance attributed to confirmation that the applicant is (or was) lawfully authorised to practise in the system of qualification.

Documents linked to professional probity are widely requested. Both **attestations confirming the absence of professional suspension or criminal conviction** and **proof of good character or professional conduct** are required in most Member States (correspondingly, BG, CZ, DE, DK, IE, IT, LU, MT, PT, RO, SI and BG, CZ, DE, DK, IE, FI, IT, LU, MT, PL, PT, RO, SI) with only a limited number of exceptions. This reflects a shared emphasis on integrity and suitability to practise as part of recognition procedures.

Lastly, the last cluster of documents displays a high variety across Member States, including a **declaration on oath or solemn declaration attesting the authenticity of the declaration** required in nine Member States (BG, CZ, DK, IE, IT, LU, MT, PT, RO); a **proof of professional liability insurance** in seven Member States (CZ, DK, IE, IT, LU, PT, RO); a **third-party recognition statements** required in 6 Member States (BE, FI, LT, LV, MT, SI); and a **proof of physical and mental fitness** required in four Member States (DE, FI, LT, PL).[293]

Beyond the healthcare sector, some illustrative evidence on documents required by some Member States to access the professions of electricians is provided in the box below.

Box 4 - Requirements to access the profession of electrician

In some Member States (LT, MT, EE, SE) TCNs undergo checks of their professional qualifications attesting **training hours and professional experiences**. For example, electricians in Malta undergo several verifications of qualifications and licensing against the Cyprus/UK standards (in place in Malta), which go beyond the educational qualifications checks and that may include interviews and ad-hoc assessments.[294] Similarly, besides education checks, access to the professions of electricians in two MS (LT, SE) entail the check of past professional experience as well as the fulfilment of specific requirements necessary to practice the profession. In Lithuania, certification must be renewed after 5 years via re-examination of such criteria.

Differently from medical doctors, there are other professions in which the professional experience is valued much more than the certification and past education certificates that a person might possess.

Source: Author's own elaboration based on evidence gathered from Focus Groups[295]

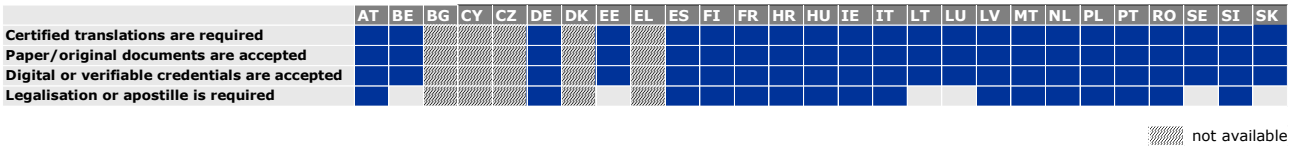
In addition to the type of documentation requested, **formal requirements** governing the submission of documents also play a significant role in shaping access procedures. The majority of surveyed CAs (79,5%) requires **certified translations of documents**.[296] In 58,4% of cases, certified translations are **systematically required for all documents submitted**, while in 28,4% of cases they are only required in specific circumstances, such as when documents are issued in languages not commonly used by the CA.[297]

[293] Survey targeted at CAs; EMN, 2024. Ad-Hoc Query 2024.16 on Recognition of third-country qualifications for the profession of doctor with basic medical training.
[294] Focus Group with CAs from the regulated professions of electricians and crane operators (n=20)
[295] Focus Group with CAs from the regulated professions of electricians and crane operators (n=20).
[296] Survey targeted at CAs, Q11: "What formal requirements must third-country nationals fulfil when submitting their documents? (Select all that apply)" (n=190)
[297] Survey targeted at CAs, Q12: "When are certified translations required? (select all that apply) (n=190)

Document format requirements also remain relatively restrictive. Two-thirds of CAs (67,4%) indicate that only **paper-based and original documents** are accepted. At the same time, a comparable share of CAs (63,7%) report accepting **digital documents or verifiable credentials**, suggesting that digital solutions are increasingly recognised alongside traditional submission formats, but they do not entirely replace yet the paper-based certificates.[298]

Other formal requirements such as, **apostille or legalisation** requirements appear less widespread. Only 34,7% of CAs report requiring apostille or legalisation of documents, and even among these, the requirement is not applied systematically.[299] Apostille or legalisation is always required in 29,5% of cases and only required in specific situations in 22,6% of cases, indicating a more selective or risk-based application.[300] The table below shows how documents requirements vary across Member States.

Figure 12 – Formal requirements across Member States[301]

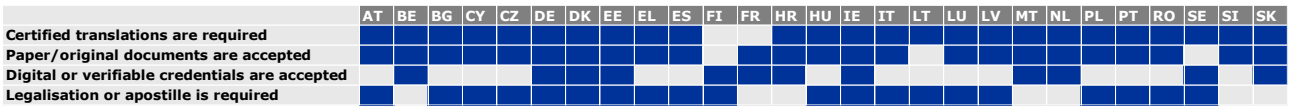


Source: Author's own elaboration based on the survey targeted at CAs

Similarly to documentation requirements, **formal requirements** vary depending on the type of profession. This is particularly true for certain professions in the healthcare sector. Indeed, for third-country doctors, **certified translations** into the national language are required in almost all responding Member States for medical degrees and supporting documents (AT, BE, BG, CY, CZ, EE, FI, FR, DE, HU, LV, LT, NL, PL, SK, SI, ES, SE).[302] Several Member States explicitly **require original documents** or **certified copies**, and **apostille or legalisation of diplomas and related documents** is systematically requested in a number of cases, either at the recognition stage or for the purposes of degree verification (FI, HU, LT). In addition, some authorities verify qualifications through direct confirmation with awarding universities or reference to recognised international databases of medical schools, based on the documentation submitted (FI, NL).[303]

As concerns doctors, **traditional, document-heavy procedures remain the norm in most Member States**, as shown by the figure below.

Figure 13 – Overview of formal requirements for doctors across Member States



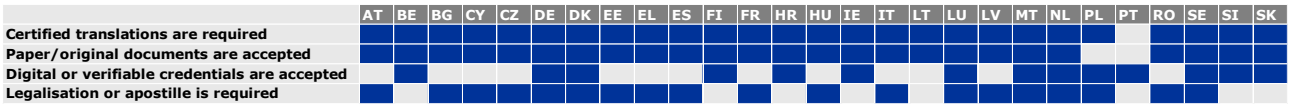
[298] Survey targeted at CAs, Q11: "What formal requirements must third-country nationals fulfil when submitting their documents? (Select all that apply)" (n=190)
[299] Survey targeted at CAs, Q11: "What formal requirements must third-country nationals fulfil when submitting their documents? (Select all that apply)" (n=190)
[300] Survey targeted at CAs, Q13: "When are legalisation or apostille required? (select all that apply) (n=190)
[301] It has to be remarked that within the same MS some formal requirement might be needed for a certain profession while it might be not needed for other professions. Indeed, this information is based on survey data gathering responses from different CAs often coming from the some MS (see section 1 for a breakdown on number of responses per type of profession and MS). In this table, we flagged with a blue cell MS in which a formal requirement is needed at least in one of the CAs consulted through the survey.
[302] EMN, 2024. Ad-Hoc Query 2024.16 on Recognition of third-country qualifications for the profession of doctor with basic medical training.
[303] EMN, 2024. Ad-Hoc Query 2024.16 on Recognition of third-country qualifications for the profession of doctor with basic medical training.

Source: Author's own elaboration based on the survey targeted at CAs, EMN AHQ[304] and national websites of CAs

In particular, **translations are widely required** (AT, BE, BG, CY, CZ, DE, DK, EE, EL, ES, HR, HU, IE, IT, LT, LU, LV, MT, NL, PL, PT, RO, SE, SI, SK), and **legalisation/apostille is also commonly requested**, underlining a continued reliance on formal authentication of documents rather than mutual trust or simplified checks (AT, BG, CY, CZ, DE, DK, EE, EL, ES, FI, HU, IT, LT, LV, PL, PT, RO, SE). In practice, **paper/original documents are still broadly accepted**, reinforcing the persistence of non-digital workflows in many systems (AT, BE, BG, CY, CZ, DE, DK, EE, EL, ES, FR, HU, IE, IT, LV, MT, NL, PL, PT, RO, SI, SK). By contrast**, acceptance of digital or verifiable credentials is more limited and uneven**, indicating that digitisation and direct electronic verification are not yet consistently embedded across Member States (BE, DE, DK, EE, FI, FR, HR, IE, MT, NL, SE, SK).

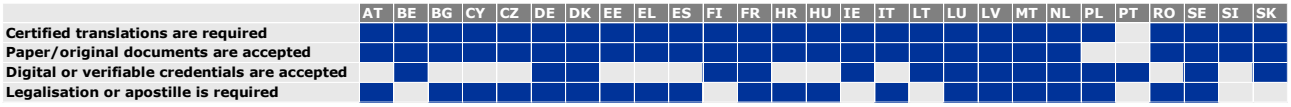
As concerns **midwives and nurses,** findings suggest a similar picture, as there is a clear tendency to prioritise **document authenticity and usability** over fully digital workflows (as shown by the figures 15 and 16 below).

Figure 14 - Overview of formal requirements for midwives across Member States



Source: Author's own elaboration based on the survey targeted at CAs, and national websites of CAs

Figure 15 - Overview of formal requirements for nurses across Member States



Source: Author's own elaboration based on the survey targeted at CAs, and national websites of CAs

For midwives and nurses**, certified translations are required by all Member States** except PT, indicating that language validation remains a standard safeguard in cross-border recognition processes for regulated healthcare. Similarly, **paper or original documents are accepted almost universally** (with the exception of PL and PT), suggesting that competent authorities continue to rely heavily on traditional documentary evidence and, in some cases, in-person verification routes when assessing third-country qualifications. **Legalisation or apostille** is required in many Member States, reinforcing the broader pattern that formal authentication remains an important control for third-country qualifications, although it is not applied consistently across the EU (nurses: AT, BG, CY, CZ, DE, DK, EE, EL, ES, FR, HR, HU, IT, LU, LV, MT, NL, PL, RO, SE; midwives: AT, BG, CY, CZ, DE, DK, EE, EL, ES, FR, HU, IT, LU, LV, MT, NL, PL, RO, SE). By contrast**, digital or verifiable credentials are accepted in less Member States** compared to other formal requirements, pointing to uneven digital maturity and/or differing levels of trust in electronic validation mechanisms within recognition systems (nurses: BE, DE, DK, FI, FR, IE, LT, LU, LV, MT, NL, PL, PT, SE, SK; midwives: BE, DE, DK, FI, HR, IE, LU, MT, NL, PL, PT, SE, SI, SK).

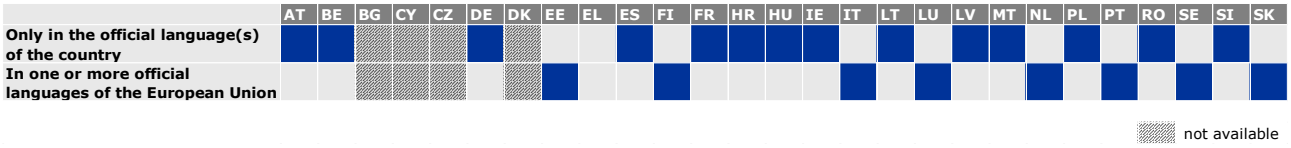
Language requirements further add to the complexity of application procedures (see Figure 16). Indeed, CAs across 14 Member States (AT, BE, DE, ES, FR, HR, HU, IE, LT, LV, MT, PL, RO, SI) only accepts documents submitted in the official language of the Member States, while CAs across seven Member States (FI, EE, IT, LU, NL, PT, SE, SK)

[304] EMN, 2024. Ad-Hoc Query 2024.16 on Recognition of third-country qualifications for the profession of doctor with basic medical training.

accept documents in one or more languages of the EU, with some Member States (AT, BE, EE, MT, NL) further mentioning that they also accept documents in English.[305]

In case of **doctors**, **language-related documentation** also plays a central role and varies widely across Member States. The documentary proof of language competence at upper-intermediate or advanced level is required at some stage of the recognition or licensing process in the large majority of systems (AT, BG, CZ, DE, ES, FI, FR, HU, LT, NL, PL, SI, SE).[306] In some cases, language certificates are required prior to recognition (BG, CZ), while in others they are requested before registration, licensing, or independent practice (FI, FR, NL, SE), but always supported by formal documentary evidence.[307]

Figure 16 - In which language(s) can TCNs submit their application and required documents? (n=190)[308]

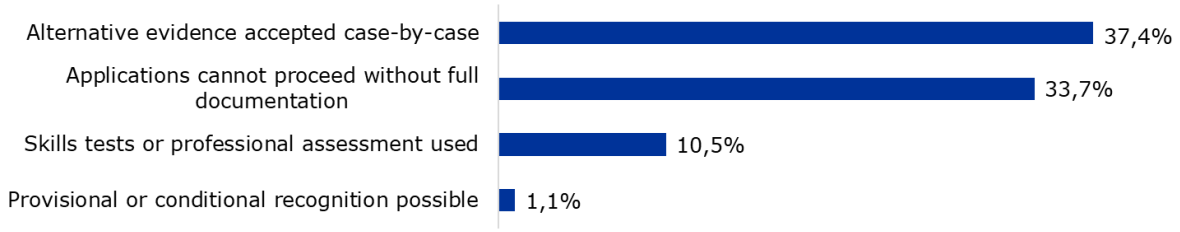


Source: Author's own elaboration based on the survey targeted at CAs

These findings point to significant variation in linguistic flexibility across Member States, with potential implications for accessibility and administrative burden for TCN applicants.[309]

Finally, when required documentation is missing or cannot be provided (e.g. in case of refugees, displaced persons and cases of migrants missing documents) CAs adopt different procedural responses. In the most common scenarios, applications are either assessed on a **case-by-case basis** using alternative forms of evidence (37,4%) or cannot proceed at all (33,7%). [310]

Figure 17 - How are cases handled when third-country national applicants lack complete documentation (e.g. refugees/displaced persons)? (n=190)



Source: Author's own elaboration based on the survey targeted at CAs

[305] Survey targeted at CAs, Q19. In which language(s) can third country nationals submit their application and required documents?" (n=190). 7; The language regime for the recognition application submission derives from the answer to the survey targeted at CAs," Q19. In which language(s) can third country nationals submit their application and required documents?"(n=190). It was constructed by counting, for each MS, the number of responses associated with each answer option. Each occurrence of an MS in the response lists was treated as one observation, reflecting multiple responses from the same MS where applicable; entries coded as "0" were excluded. For each MS, the frequency of responses across the five answer options (Only official language(s), EU official language(s), Applicant's language of choice) was calculated. The "most frequent answer" for each MS corresponds to the modal category, i.e. the option with the highest number of responses. Where two or more options had the same highest frequency, results were reported as a tie and considered on a case-by-case basis.

[306] EMN, 2024. Ad-Hoc Query 2024.16 on Recognition of third-country qualifications for the profession of doctor with basic medical training.

[307] EMN, 2024. Ad-Hoc Query 2024.16 on Recognition of third-country qualifications for the profession of doctor with basic medical training.

[308] Survey targeted at CAs, Q12: "When are certified translations required? (select all that apply) (n=190)

[309] Survey targeted at CAs, Q19. "In which language(s) can third country nationals submit their application and required documents?" (n=190)

[310] Survey targeted at CAs, Q27. "How are cases handled when third-country national applicants lack complete documentation (e.g. refugees/displaced persons)? (n=190)

To sum up, despite some variation in documentation requirements for the recognition of TCQs, the vast majority of CAs request diplomas or certificates, academic transcripts or curriculum details, in almost all Member States. While core documents, such as diplomas or certificates and academic transcripts or curriculum details, are required for virtually all professions, specific requirements may vary depending on the CA and the profession concerned. For example, for nurses and midwives across EU Member States, proof of professional experience is required in almost all Member States, with very few exceptions. By contrast, for doctors with basic medical training, such requirements exist in only about half, or fewer than half, of the Member States.

In terms of formal requirements, certified translations are required quite restrictively across Member States, whereas apostilles and legalisation are required only in a minority of Member States and, in most cases, not in a systematic manner.

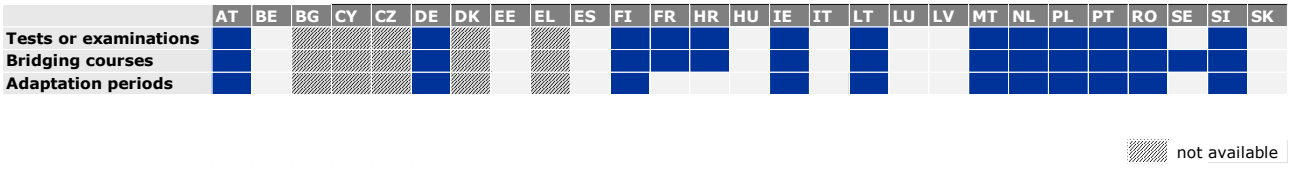
Lastly, where documentation is missing, applications are generally either assessed on a case-by-case basis using alternative forms of evidence or cannot be assessed at all.

Annex 8.2.4 Compensation measures

Whenever substantial gaps are identified between the applicant's qualifications and the training requirements necessary for recognition in the host Member State, CAs apply **compensation measures**. This section provides an overview of the most commonly used compensation measures for TCNs, complemented by illustrative examples for selected professions in the healthcare sector, including doctors with basic medical training, midwives, and nurses.

Compensation measures most commonly take the form of **tests or examinations** as reported by 39 out of 69 CAs respondents in 13 Member States (AT, HR, FI, FR, DE, IE, LT, MT, NL, PL, PT, RO, SI), **bridging courses** as reported by 19 out of 69 CAs in 14 Member States (AT, HR, FI, FR, DE, IE, LT, MT, NL, PL, PT, RO, SI, SE) and **adaptation periods as reported by** 27 out of 69 CAs in 11 Member States (AT, FI, DE, IE, LT, MT, NL, PL, PT, RO, SI).[311] The table shows how compensation measures vary across MS.

Figure 18 - Type of compensation measures across EU Member States (n=190) [312]



Source: Author's own elaboration based on the survey targeted at CAs

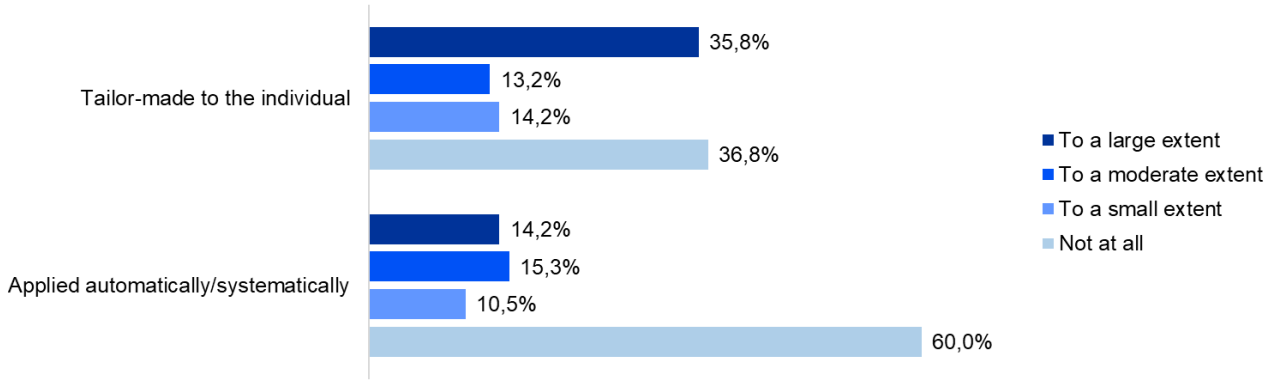
Overall, the evidence shows that the **application of compensation measures** in the recognition of TCN qualifications **is not systematic across Member States**. The majority of CAs (60%) confirm that compensation measures are not applied in a systematic manner. Within this group, approaches diverge significantly: while 35,8% of CAs state that **compensation measures are applied to a large extent in a case-by-case, tailor-made**

[311] Survey targeted at CAs, Q6.b. "If compensation measures are applied more frequently to third-country nationals, what do they consist of? (Select all that apply)" (n=69)

[312] It has to be remarked that within the same MS some compensation measures might be required for a certain profession while it might be not required for other professions. Indeed, this information is based on survey data gathering responses from different CAs often coming from the same MS (see section 1 for a breakdown on number of responses per type of profession and MS). In this table, we flagged with a blue cell MS in which a compensation measures is needed at least in one of the CAs consulted through the survey.

manner, a similarly large share (36,8%) report that compensation measures are **not tailored at all to the individual TCN applicant**.[313]

Figure 19 - To what extent are compensation measures for third-country nationals:

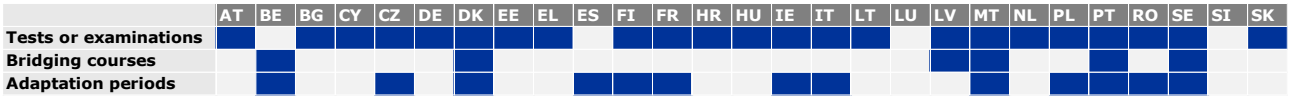


Source: Author's own elaboration based on the survey targeted at CAs

Conversely, compensation measures might be mandatory for certain professions, irrespective of the presence or lack of gaps in educational or professional qualifications. For example for doctors with basic medical training some Member States impose requirements such as **mandatory two-year skills consolidation programme following examinations** (FR), **exam preparation** periods of up to two years (HU), or **mandatory periods of supervised practice** of at least six months prior to further assessment or licensing (EE).[314] In a similar manner, electricians in Malta must work as assistants under supervision for a given period before they are allowed to fully obtain the recognition and practice the profession. Also, TCNs crane operators in the Netherlands must pass an exam in order to obtain access to the profession of crane operators, while both electricians and specialised doctors in Malta must undergo through a mandatory adaptation period.[315]

The figure below provides an overview of the compensation measures for doctors with basic medical training applied across Member States.

Figure 20 – Overview of compensation measures for doctors with basic medical training across Member States



Source: Author's own elaboration based on the survey targeted at CAs, EMN AHQ[316] and national websites of CAs

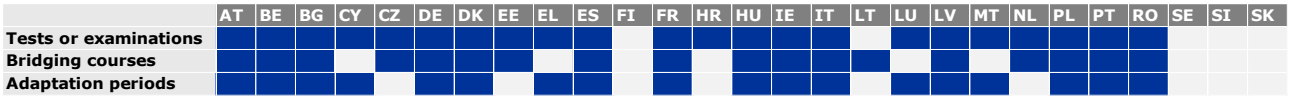
Across the Member States covered, **tests or examinations are by far the most widespread compensation measure for doctors from third countries**, being required in most cases (AT, BG, CY, CZ, DE, DK, EE, EL, FR, HR, HU, IE, IT, LT, LV, MT, NL, PL, PT, RO, SE, SK). By contrast, **bridging courses appear comparatively limited and are only required in a small subset of Member States** (BE, DK, PL, PT). **Adaptation periods are more common than bridging courses but remain less prevalent than tests/examinations**, applying in around half of the Member States shown (BE, CZ, DK, ES,

[313] Survey targeted at CAs, Q7: "To what extent are compensation measures for third-country nationals: (Select all that apply)" (n=190)
[314] EMN, 2024. Ad-Hoc Query 2024.16 on Recognition of third-country qualifications for the profession of doctor with basic medical training.
[315] Focus Group with CAs from the regulated professions of electricians and crane operators (n=20); Focus Group with CAs in the healthcare sector (n=31).
[316] EMN, 2024. Ad-Hoc Query 2024.16 on Recognition of third-country qualifications for the profession of doctor with basic medical training.

FI, FR, IE, IT, MT, PL, PT, RO, SE). Notably, LU and SI are the only Member State that do not provide compensation measures.

Similarly to doctors, **compensation measures for midwives are predominantly based on formal assessments**, as shown by the figure below.

Figure 21 - Overview of compensation measures for midwives across Member States

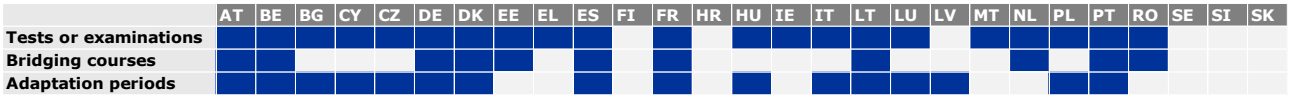


Source: Author's own elaboration based on the survey targeted at CAs, EMN AHQ317 and national websites of CAs

For midwives**, tests or examinations are required in the large majority of countries** (AT, BE, BG, CY, CZ, DE, DK, EE, EL, ES, HR, HU, IE, IT, LV, MT, NL, PL, PT, RO), whereas **bridging courses are less consistently used** and are absent in a sizeable minority (AT, BE, BG, CZ, DE, DK, EE, IT, LT, LU, NL, PL, RO). **Adaptation periods sit between these two approaches in terms of uptake**, present in many systems but not universal (AT, BE, BG, CY, DE, DK, ES, IE, IT, LV, MT, PL, PT, RO). Notably, FI, SE, SI and SK are the only Member States in which compensation measures are not provided.

A similar picture emerges for nurses, as shown by the figure below.

Figure 22 - Overview of compensation measures for nurses across Member States



Source: Author's own elaboration based on the survey targeted at CAs, EMN AHQ[318] and national websites of CAs

Tests or examinations are the dominant compensation measure across the Member States shown, being required in most cases, with only a small minority not using this approach (FI, HR, LV, SE, SI, SK). Bridging courses are comparatively less common and appear concentrated in a smaller group of Member States, while most do not require them (AT, BE, DE, DK, EE, FR, LT, NL, PT, RO). Adaptation periods are also widely used (similar to tests) but are not applied by a limited set of Member States (EE, EL, ES, FI, HR, IE, MT, NL, RO, SE, SI, SK).

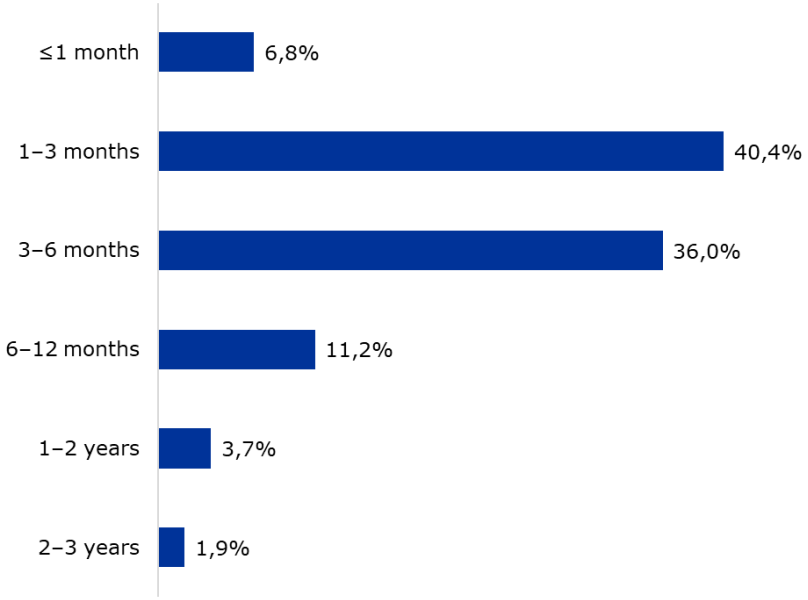
To conclude, TCNs are generally subject to compensation measures where gaps are identified between TCQs and EU qualifications. The most commonly applied measures include tests or examinations, adaptation periods, and, to a lesser extent, bridging courses. Across Member States and professions, the application of these measures is typically not systematic, but rather tailored to the individual assessment of qualifications and professional experience. In parallel, for certain sectoral health professions, such as doctors, midwives, and nurses, compensation measures may be required irrespective of the presence of identified gaps, reflecting the strict regulatory frameworks governing these professions. In these cases, as well, tests or examinations and adaptation periods remain the predominant forms of compensation, while bridging courses are used more rarely.

[317] EMN, 2024. Ad-Hoc Query 2024.16 on Recognition of third-country qualifications for the profession of doctor with basic medical training.
[318] EMN, 2024. Ad-Hoc Query 2024.16 on Recognition of third-country qualifications for the profession of doctor with basic medical training.

Annex 8.2.5 Processing timelines and costs for TCNs

With regard to processing **timelines**, survey results indicate that, across most regulated professions, CAs report relatively moderate average durations between the submission of a complete application and the adoption of a decision, as presented in this section.

Figure 23 - In your experience, what is the average timeline from complete application to decision for third-country nationals? (n=161)[319]



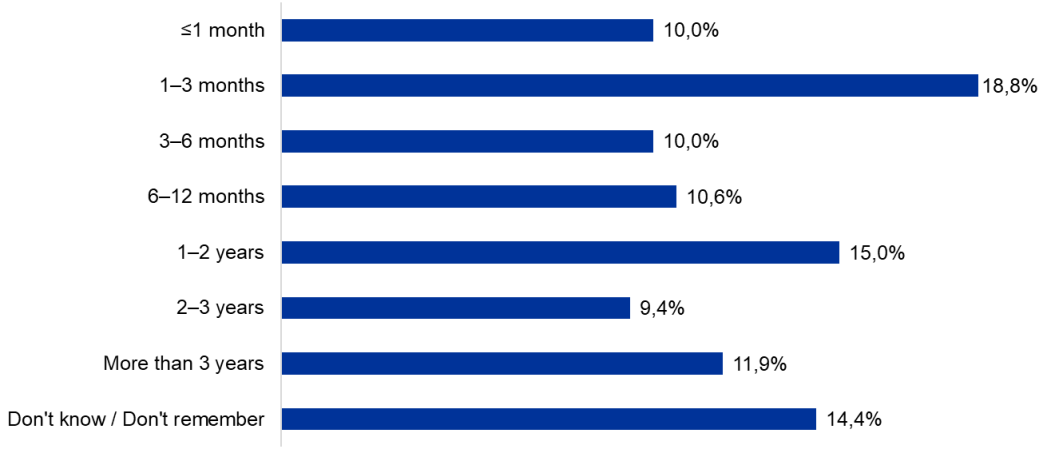
Source: Author's own elaboration based on the survey targeted at CAs

Overall, **83,2% of surveyed CAs report average timelines between one and six months**, almost split between **one to three months** (40,4%) and **three to six months** (36%. Shorter timelines of less than one month are reported by 6,8% of CAs, while 11,2% indicate that procedures typically take between six and twelve months (see Figure 23).

However, when considering answers from TCNs surveyed with a targeted survey and the PC analysis, results differ slightly as showcased in the figure below.

[319] Survey targeted at CAs, Q16. "In your experience, what is the average timeline from complete application to decision for third-country nationals?" (n=161). 15 CAs have replied "Do not know" which have therefore been excluded from this count.

Table 31 - How long did the recognition process take from start (gathering all necessary documents) to finish (receiving a decision or final outcome)? (n=160)[320]

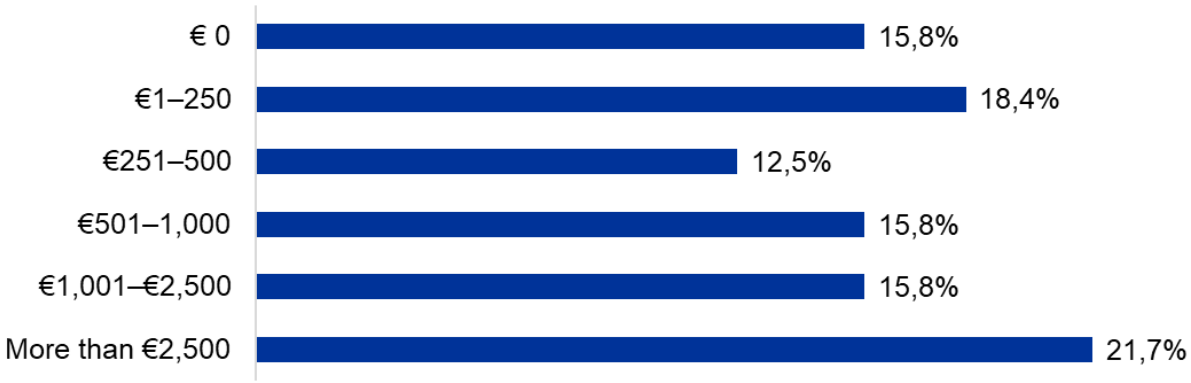


Source: Author's own elaboration based on the survey targeted at TCNs and the PC analysis

Indeed, the 18,8% of TCNs and EU citizens with TCQs participating into the survey indicated an estimated timeline between 1 and 3 months, in line with estimates provided by CAs. However, this is followed by a 15% of respondents indicated a timeline between 1 and 2 years and an 11,9% indicating over 3 years.

Turning to overall **costs of the application procedures for recognition** (including all fees and costs incurred for translations, relevant certifications and fees) vary widely, as showcased in Figure 24. Indeed, 21,7% of TCNs participating in a targeted survey estimated overall costs for applying to recognition of qualifications above **€2500,** followed by an 18,5% estimating between **€1 and €250.**[321]

Figure 24 - Approximately how much did the recognition process of one qualification cost you overall (please estimate all fees and costs paid, including for translations, certifications and the application)? (n=152)



Source: Author's own elaboration based on the survey targeted at TCNs and the PC analysis

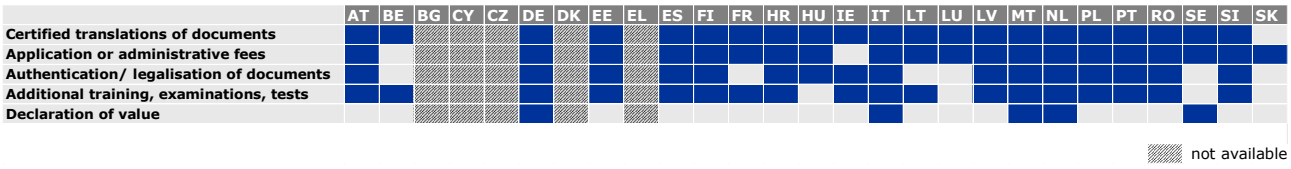
Most commonly, these expenses are related to **certified translations of documents in 21 MS** (AT, BE, DE, EE, ES, FI, FR, HR, HU, IE, IT , LT, LU, LV, MT, NL, PL, PT, RO, SE, SI) and **application or administrative fees in 20 MS** (AT, DE, EE, ES, FI, FR, HR, HU, IT, LT, LU, LV, MT, NL, PL, PT, RO, SE SI). A smaller but still substantial share of CAs also highlight

[320] Survey targeted at TCNs. Q13. How long did the recognition process take? (n=160)

[321] Survey targeted at TCNs, Q18. Approximately how much did the recognition process of one qualification cost you overall (please estimate all fees and costs paid, including for translations, certifications and the application)? (n=152)

costs linked to the **authentication or legalisation of documents** in 16 MS (AT, DE, EE, ES, FI, HR, HU, IE, IT, LV, MT, NL, PL, PT, RO, SI), as well as expenses associated with **additional training, examinations, or tests** required as part of compensation measures (39.3%).[322] Overall, as shown in Annex 4.2 the average application fee for recognition of qualifications through CAs borne by TCNs is estimated around **€150 ,** dropping to **€130** for procedures through the ENIC NARIC centres (e.g. nostrification, certifications), while cost associated with translation of documents and legalisation respectively amount to **€200** and **€100** on average (see Annex 4.3 for further details).

Figure *25* **-Costs borne by TCNs across EU Member States**



Source: Author's own elaboration based on the survey targeted at CAs

Overall, as shown in Annex 4.2 the average application fee for recognition of qualifications through CAs borne by TCNs is estimated around **€150 ,** dropping to **€130** for procedures through the ENIC NARIC centres (e.g. nostrification, certifications), while cost associated with translation of documents and legalisation respectively amount to **€200** and **€100** on average (see Annex 4.3 for further details).

The level of **application fees** shows **extreme variation not only across MS but also across professions**, ranging from **no fees at all** to charges **exceeding €2000** (see section Annex 8.3.6 for more details regarding fees incurred by TCNs by professions across EU member States).[323] Health professions—and in particular **medical doctors and dentists**—are consistently associated with the **highest financial burden**, with fees above €1,000 reported in several Member States (HR, FI, NL, SE).[324]

By contrast, many Member States apply **zero or symbolic fees** for recognition procedures in a wide range of **non-health professions**, including education, business, construction, and social care (AT, FR, IT, PL, PT, RO).[325] **Healthcare assistants** generally face **lower but non-negligible costs**, most commonly ranging between **€50 and €200**, although significantly higher cumulative expenses are reported in specific systems where recognition is combined with extensive compensation measures (DE).[326]

[322] Survey targeted at CAs, Q17. "What type of costs are typically incurred by third country nationals for recognition of qualifications?" (Select all that apply) (n=190)
[323] Survey targeted at CAs, Q17. "What type of costs are typically incurred by third country nationals for recognition of qualifications?" (Select all that apply) (n=190)
[324] Survey targeted at CAs, Q17. "What type of costs are typically incurred by third country nationals for recognition of qualifications?" (Select all that apply) (n=190); EMN, 2024. Ad-Hoc Query 2024.16 on Recognition of third-country qualifications for the profession of doctor with basic medical training.
[325] Survey targeted at CAs, Q17. "What type of costs are typically incurred by third country nationals for recognition of qualifications?" (Select all that apply) (n=190); EMN, 2024. Ad-Hoc Query 2024.16 on Recognition of third-country qualifications for the profession of doctor with basic medical training.
[326] Survey targeted at CAs, Q17. "What type of costs are typically incurred by third country nationals for recognition of qualifications?" (Select all that apply) (n=190); EMN, 2024. Ad-Hoc Query 2024.16 on Recognition of third-country qualifications for the profession of doctor with basic medical training.

Annex 8.2.6 Digitalisation and authenticity checks

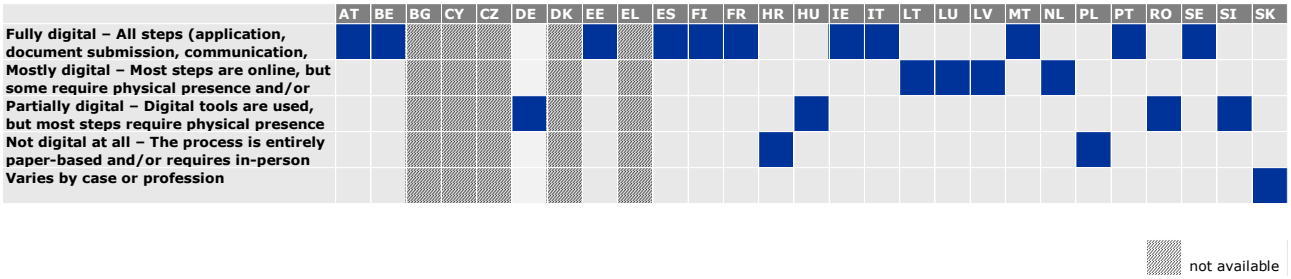
At the operational level, the **digitalisation of recognition procedures varies significantly across Member States,** affecting multiple stages of the process, including authentication checks and the verification of supporting documentation.

In fact, just over one-third of CAs (35,8%) report **operating fully digital procedures,** where all steps—including application submission, document upload, communication, and the final decision—can be completed online. A similar share indicates that procedures are **mostly digital** (26,8%), with the majority of steps handled online but certain stages still requiring physical presence or paper documents.[327]

However, a non-negligible proportion of CAs **reports limited or no digitalisation**. In 16,3% of cases, procedures are only partially digital, with digital tools used for some steps but most stages still relying on paper-based or in-person processes. Moreover, 16,3 % of CAs indicate that recognition procedures are not digital at all, remaining fully paper-based or requiring in-person interaction throughout. A further 7,4% report that the degree of digitalisation varies by case or profession.[328]

The figure below provides an overview of the overall degree of digitalisation across EU Member States (see Appendix for further details)

Figure 26 -Degree of digitalisation of recognition procedures across EU member States [329]



Source: Author's own elaboration based on the survey targeted at CAs

Procedures for **verifying the authenticity of submitted documents** emerge as a major operational concern for CAs, a point consistently highlighted across focus groups and interviews.[330] Survey results confirm that authenticity checks rely heavily on resource-intensive and often manual verification methods, including:

[327] Survey targeted at CAs, Q18. "To what extent can third country nationals complete the recognition process using digital procedures (i.e. without in-person or paper-based steps)?"(n=190);
[328] To what extent can third country nationals complete the recognition process using digital procedures (i.e. without in-person or paper-based steps)?
[329] The degree of digitalisation derives from the answer to the survey targeted at CAs,"Q18. To what extent can third country nationals complete the recognition process using digital procedures (i.e. without in-person or paper-based steps)?" (n=190). It was constructed by counting, for each MS, the number of responses associated with each answer option. Each occurrence of an MS in the response lists was treated as one observation, reflecting multiple responses from the same MS where applicable; entries coded as "0" were excluded. For each MS, the frequency of responses across the five answer options (fully digital, mostly digital, partially digital, not digital at all, and varies by case or profession) was calculated. The "most frequent answer" for each MS corresponds to the modal category, i.e. the option with the highest number of responses. Where two or more options had the same highest frequency, results were reported as a tie and considered on a case-by-case basis.
[330] Focus Group with CAs from the regulated professions in the healthcare sector (n=31); Focus Group with CAs from the regulated professions of electricians and crane operator (n=20); Focus Group with Migration Authorities and Ios (n=28); Focus Group with ENIC NARIC and PES (n=28); Five targeted interviews with Professional associations.

- **contacting awarding institutions** in third countries **directly** to verify documents (49,7% – AT, BE, HR, EE, FI, DE, HU, IE, IT, LV, LT, LU, MT, NL, PL, PT, RO, SK, SI, ES, SE). This include CAs in the field of electrician professions in Italy and Malta;[331]
- Check of **internal databases**, **sample comparisons, and internal reference materials** (39,8% – AT, BE, HR, EE, FI, FR, DE, HU, IE, IT, LV, LT, LU, MT, NL, PL, PT, RO, SK, SI, ES, SE);
- Check of **national verification platforms** (36,1% – AT, BE, FI, DE, HU, IE, IT, LV, LT, LU, MT, NL, PT, RO, SK, SI, ES, SE).

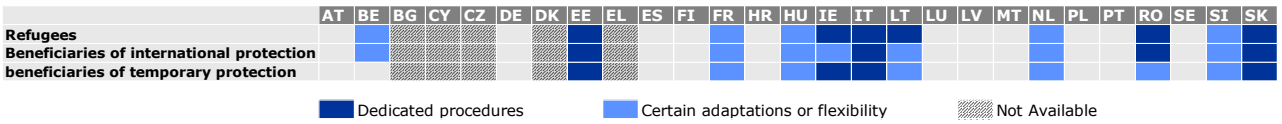
Additional verification channels are used more sporadically, **including cooperation with national diplomatic authorities in the country of origin** (IT), contacts with **relevant third-country ministries** (EE), or reliance on **internal expert knowledge** within the authority itself (AT, DE).

Annex 8.2.7 Differential treatment of vulnerable groups

Procedural differences in the recognition of qualifications and validation of skills apply to certain vulnerable groups of TCNs, most notably refugees and beneficiaries of international and temporary protection, but only in a limited number of Member States. Dedicated procedures for **refugees** are in place in just six Member States (EE, IE, IT, LT, RO, SK), while a further five (BE, FR, HU, NL, SI) apply specific adaptations or flexibilities within their standard procedures.

A similar pattern applies to **beneficiaries of international protection**. Dedicated procedures exist in four Member States (EE, IT, RO, SK), while seven others provide targeted adaptations or flexibilities within the general framework (BE, FR, HU, IE, LT, NL, SI). **For beneficiaries of temporary protection**, dedicated procedures are likewise reported in four Member States (EE, IE, IT, SK), accompanied by procedural flexibilities or adaptations in seven additional Member States (BE, FR, HU, LT, NL, RO, SI).[332]

Figure 27 - Specific procedures or arrangements for the recognition of qualifications and/or validation of skills of specific groups of TCNs across EU MS



Source: Author's own elaboration based on the survey targeted at NARIC centres

Annex 8.2.8 Information provision for TCNs

Overall, almost all MS provide **information to TCNs** on the procedures for the recognition of qualifications and validation of skills (AT, BE, BG, DE, EE, EL, ES, FI, FR, HR, HU, IE, IT, LT, LU, LV, MT, NL, PL, PT, RO, SE, SI, SK).[333] More precisely, information is provided

[331] Focus Group with CAs from the regulated professions of electricians and crane operators

[332] Survey targeted at NARIC centres, Q16. "Does your NARIC centre apply specific procedures or arrangements for the recognition of qualifications and/or validation of skills of specific groups of TCNs, e.g. refugees, beneficiaries of international protection, temporary protection, or other humanitarian statuses?" (n=18). Answers: Refugees (Dedicated procedures: 7, procedural flexibilities: 5 No: 5), Beneficiaries of international protection (Dedicated procedures: 5, procedural flexibilities: 7 No: 5), Beneficiaries of temporary protection (Dedicated procedures: 5, procedural flexibilities: 7 No: 5).

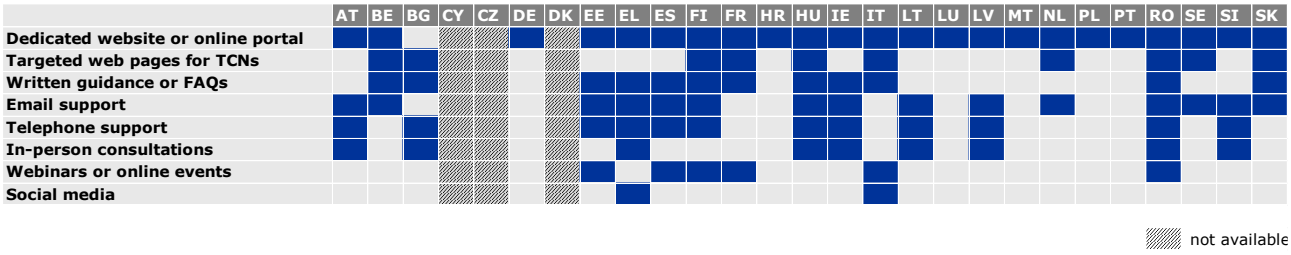
[333] Survey targeted at NARIC centres, Q19. "To what extent does your NARIC centre provide targeted information and support specifically for TCNs?" (n=18), Answers: Comprehensive and targeted information (to a large extent: 8, to a moderate extent: 3, to a small extent: 5, not at all: 2), partial or general information (to a large extent: 1, to a moderate extent: 4, to a small extent: 1, not at all: 1), minimal information (to a large extent: 1, to a moderate extent: 3, to a small extent: 8, not at all: 8), no information (to a large extent: 1, to a moderate extent: 3, to a small extent: 8, not at all: 8); Survey targeted at CAs, Q20. "How can applicants from third-countries access information on the requirements and procedures for the recognition of qualifications in your country? (Select all that apply)" (n=190)

by relevant CAs and Ministries, and in some cases even **ENIC NARIC centres** (as indicated by 18,9% of CAs),[334] mainly through:

- **dedicated websites**, most often managed by the relevant CAs or national ministries in 23 Member States (AT, BE, DE, EE, EL, ES, FI, FR, HR, HU, IE, IT, LT, LU, LV, MT, NL, PL, PT, RO, SE, SI, SK) and corroborated by the majority of TCNs (60,9%), with only a minority of TCNs indicating websites managed by the EU (24,1%);[335]
- **direct contact**, notably via **email** in 15 Member States (AT, BE, EE, EL, ES, FI, HU, IE, LT, LV, NL: RO, SE, SI, SK), **telephone** in 12 Member States (AT, BG, EE, EL, ES, FI, HU, IE, LT, LV, RO, SI), or **in-person consultation** in nine Member States (AT, BG, EL, HU, IE, LT, LV, RO, SI), and corroborated by 77,9% of TCNs, indicated channels including professional organisations or trade unions (27,3%), recruiters and employers (17,8%) and informal networks (24,1%);[336]
- **written guidance or FAQs** in 12 Member States (BE, BG, EE, EL, ES, FI, FR, HU, IE, IT, RO, SI); [337]
- **targeted webpages for TCNs** in 10 Member States (BE, BG, FI, FR, HU, IT, NL, RO, SE, SK).[338]

The table below provides a complete overview of the main information provision means through which EU Member States provide information to TCNs regarding procedures to recognise professional qualifications.

Figure 28 - Channels of information provision on recognition procedures to TCNs[339]



Source: Author's own elaboration based on the survey targeted at NARIC centres and CAs

[334] Survey targeted at CAs, Q20. "How can applicants from third-countries access information on the requirements and procedures for the recognition of qualifications in your country? (Select all that apply)" (n=190)

[335] Survey targeted at TCNs : Q10. Where did you look for information about the recognition of qualifications? (Select all that apply) (n=253); Survey targeted at NARIC centres, Q20. "To what extent are the following mechanisms used to provide information to TCNs?" (n=18); Answers: dedicated website (to a large extent: 1, to a moderate extent: 3, to a small extent: 8, not at all: 8).

[336] Survey targeted at NARIC centres, Q20. "To what extent are the following mechanisms used to provide information to TCNs?" (n=18); Answers: Email support (to a large extent: 10, to a moderate extent: 5, to a small extent: 3, not at all: 0), Telephone support (to a large extent: 8, to a moderate extent: 6, to a small extent: 2, not at all: 2), In-person consultations (to a large extent: 4, to a moderate extent: 4, to a small extent: 2, not at all: 8). Survey targeted at TCNs : Q10. Where did you look for information about the recognition of qualifications? (Select all that apply) (n=253)

[337] Survey targeted at NARIC centres, Q20. "To what extent are the following mechanisms used to provide information to TCNs?" (n=18); Answers: Written guidance or FAQs (to a large extent: 6, to a moderate extent: 7, to a small extent: 2, not at all: 3).

[338] Survey targeted at NARIC centres, Q20. "To what extent are the following mechanisms used to provide information to TCNs?" (n=18); Answers: targeted web pages for TCNs (to a large extent: 1, to a moderate extent: 3, to a small extent: 8, not at all: 8)

[339] Survey targeted at NARIC centres, Q20. "To what extent are the following mechanisms used to provide information to TCNs?" (n=18); Survey targeted at CAs, Q20. "How can applicants from third-countries access information on the requirements and procedures for the recognition of qualifications in your country? (Select all that apply)" (n=190)

In addition, NARIC centres across EU MS support relevant CAs for regulated professions with the provision of information on TCQs and skills in 17 Member States either occasionally (BE, BG, FR, EL, HU, IT, LT, RO, SE) or on a regular basis (EE, ES, LV, NL, SI, SK).[340]

In terms of **clarity**, TCNs highlight that information regarding the requirements for recognition is only somewhat clear according to the majority of respondents (53%), with an additional 21,3% indicating that it is not clear at all.[341]

Annex 8.3 Qualifications and skills checks within migration pathways

Annex 8.3.1 The conceptual frame — what migration procedures can and cannot do

While the previous sections have examined formal recognition procedures for TCQs, in the specific context of regulated professions, it is equally important to consider how **qualifications and skills are assessed as part of the migration process**. Indeed, in addition to the recognition systems for accessing regulated professions, there are **assessments of qualifications that impact on entry or residence decisions in the context of migration procedures, especially for migration pathways targeting highly skilled workers**. These checks aim to verify whether applicants meet eligibility criteria for entry and residence, and typically involve the review of education credentials, professional experience, or other supporting evidence.

However, these assessments do **not constitute formal recognition decisions**, which are generally required, often as a separate and precedent step to access some high-skilled migration pathways or a subsequent step for accessing to and practicing within regulated professions (see the section below for further details). As such, applicants may be admitted under a given migration pathway on the basis of their qualifications, while still needing to undergo a distinct recognition procedure before being able to work in their profession.

This distinction is relevant for the analysis. While both processes rely on broadly similar types of documentation and evidence, they are governed by different legal frameworks, involve different authorities, and pursue distinct objectives. As a result, they are typically not fully aligned across Member States. This may have practical implications, including potential delays, some duplication of procedures, and a degree of uncertainty for TCNs, as well as reduced predictability for employers seeking to recruit skilled workers.

Against this background, the sections below provide an overview of the qualifications and skills checks performed within migration pathways. They examine the **scope of these checks**, including their application across different pathways and the extent to which they are conducted. The analysis further outlines the **methods** used to assess qualifications and skills, including the types of **documents typically requested**, the **timelines** within which these checks take place, and the associated costs, primarily in the form of fees.

[340] Survey targeted at NARIC centres, Q21. “Does your NARIC centre provide targeted informal information or informal support to the following bodies regarding TCQs and skills?” (n=18), answers: Relevant competent authorities for the recognition of professional qualifications (Yes, on a regular basis: 7; Yes, occasionally: 9; No: 2), National migration authorities responsible for labour migration (Yes, on a regular basis: 2; Yes, occasionally: 15; No: 1), National employment authorities (Yes, on a regular basis: 3; Yes, occasionally: 14; No: 1), Employers (Yes, on a regular basis: 6; Yes, occasionally: 11; No: 1).

[341] Survey targeted at TCNs, Q11. How clear was the information you found about the requirements for recognition? (n=253)

Annex 8.3.2 Scope of checks across migration pathways — a summary

Evidence shows that **26 Member States apply qualification and skills-related requirements in labour migration procedures**, including through **embedded checks of the relevance and authenticity of qualifications and acquired skills** (e.g. whether the qualification is relevant to the job offer to which the visa/permit application is connected, and whether the qualification is authentic) , **eligibility conditions** (e.g. whether the qualification grants eligibility to a given migration pathway) or **external recognition requirements** (e.g. the need for a priori formal recognition) (AT, BE, BG, CY, CZ, DE, EE, EL, ES, FI, FR, HR, HU, IE, IT, LT, LU, LV, MT, NL, PL, PT, RO, SE, SI, SK). These checks vary significantly across migration pathways and professions. While certain permits (notably the EU Blue Card and the Hungarian Card) legally require holding a qualification or professional profile, other permits are based on a case-by-case assessment basis, with skills and qualifications primarily becoming relevant after entry, in connection with access to regulated professions, and are handled entirely outside migration procedures.

25 Member States (AT, BE, BG, CY, CZ, DE, EE, EL, ES, FI, FR, HR, HU[342], IT, LT, LU, LV, MT, NL, PL, PT, RO, SE, SI, SK) perform qualification-related eligibility checks under **the EU Blue Card**, an EU-wide migration pathway designed to attract highly qualified TCNs to work and reside in the EU. The EU Blue Card framework does not apply to Ireland and Denmark.

In addition, evidence shows that TCNs' qualification and skills checks are reported for the following migration pathways:[343]

- National highly skilled permits: BE, BG, DE, FR, IE, PL, PT;
- EU Single Permit: BE, BG, CZ, LT, PL;
- Skilled technical (e.g. holder of Vocational Education and Training (VET) qualifications): BE, CZ, FR, IT, LT, PL, PT;
- Seasonal workers: BE, CZ, PL;
- Family reunification: HU, LT, PL;
- Students/researchers: BE, IE, PL, PT, SK;
- Entrepreneurs/investors: BE, FR, PL, PT;
- International protection: AT, LT, PL, PT;
- Long-term residents: PL, PT;
- Intra-corporate transferees: BE, CZ, FR, HU, IE, LT, PL.

These checks vary in extent according to the type of migration pathway across the different Member States. The cost implications of these requirements are quantified separately in Annex 4.5, under the cost model for migration-related qualification checks in non-regulated professions.

The table below provides an overview of the- occurrence of qualification checks, the extent of these checks i.e. whether they are eligibility and documentary checks or substantive

[342] Hungary does apply a qualification-related eligibility condition under the EU Blue Card (higher qualification/professional experience as a legal requirement). However, the case study does not include any information of how checks are conducted.
[343] Survey targeted at migration authorities, Q6: "For which migration routes are skills and qualification checks most commonly required? (Select all that apply)" n=48

equivalence) and their timing (i.e. pre- post- entry or parallel) across different migration pathways, including: EU Blue Card; national high-skilled schemes; skilled technical/VET level routes; seasonal workers; family reunification; researchers and academia; entrepreneurs and investors; beneficiaries of international protection; beneficiaries of temporary protection; long-term residence; and ICT routes.

Table 32- Qualification checks performed within migration pathways across EU Member States

Migration pathway	Member States in which qualification checks occur	Extent of qualification checks	Timing of qualification checks
EU Blue Card	**25** (AT, BE, BG, CY, CZ, DE, EE, EL, ES, FI, FR, HR, HU, IT, LT, LU, LV, MT, NL, PL, PT, RO, SE, SI, SK)	• **Formal assessment** of qualification and skills embedded in the migration Procedure: 1 (AT) • Requirement for a national qualification or a **full equivalence**: 1 (DE) • Formal or documentary **verification of eligibility**: 23 (BE, BG, CY, CZ, EE, EL, ES, FI, FR, HR, HU, IT, LT, LU, LV, MT, NL, PL, PT, RO, SE, SI, SK)[344]	• In parallel: 24 (AT, BE, BG, CY, CZ, , EE, EL, ES, FI, FR, HR, HU, IT, LT, LU, LV, MT, NL, PL, PT, RO, SE, SI, SK) • Pre-entry: 7 (DE)
National high-skilled schemes	**8** (BE, BG, DE, FR, IE, MT, PL, PT)	• Requirement for a national qualification or a **full equivalence**: 1 (DE) • Formal or documentary **verification of eligibility** for the permit category: 7 (BE, BG, FR, IE, MT, PL, PT)	• Pre-entry: 8 (BE, BG, DE, FR, IE, MT, PL, PT)
EU Single Permit	**5** (BE, BG, CZ, LT, PL)	• **Systematic checks** by labour and/or migration authorities as part of the permit decision: 3 (BE, BG, CZ, LT) • .**Ad-hoc qualifications checks** only when required: 1 (LT)	• In parallel: **5** (BE, BG, CZ, LT, PL)
Skilled technical/VET level routes	**8** (BE, CZ, FR, IT, LT, MT, PL, PT)	• Formal or documentary **verification of eligibility** for the migration route and employer led suitability screening (i.e. no formal assessment): (BE, CZ, FR, IT, LT, MT, PL, PT) o **Skills validation** for certain sector-specific labour migration routes (e.g healthcare sector, tourism): **1** (MT) o **Qualification recognition handled outside migration procedures** by education/recognition bodies, while	• In parallel: (BE, CZ, FR, IT, LT, MT, PL, PT)

[344] Documentary verification checks the applicant's eligibility, including (where applicable) the existence of a formal recognition decision. For regulated professions, this means that formal recognition—rather than documentary evidence alone—is required and thus acts as a prerequisite for the EU Blue Card application.

Migration pathway	Member States in which qualification checks occur	Extent of qualification checks	Timing of qualification checks
		permits are processed through migration/labour authorisation chains: **2** (BE, FR)	
Seasonal Workers scheme	**3** (BE, CZ, PL)	• **Permit eligibility** and employment conditions compliance; (BE, CZ, PL)	• Pre-entry: (BE, CZ, PL)
Family Reunification schemes	**2** (LT, PL)	• **Qualification/skills checks do not constitute a systematic skills admission** filter within the reunification decision itself. Where later recognition requirements arise, they are linked to professional practice (especially regulated professions) rather than to the reunification admission decision.	• Post-entry: (LT, PL)
Researchers and academia	**5** (BE, IE, PL, PT, SK)	• Formal or documentary **verification of eligibility** (e.g. route conditions such as enrolment or hosting): (BE, IE, PL, PT, SK)	• Pre-entry: (BE, IE, PL, PT, SK)
Entrepreneurs and investors scheme	4 (BE, FR, PL, PT)	• Checks are **proxy-based** and tied to **economic/project criteria:** (BE, FR, PL, PT)	• Pre-entry: (BE, FR, PL, PT)
International Protection	**4** (AT, LT, PL, PT)	• **Protection decisions are status-based**, so skills/qualification checks referenced arise only after entry: (AT, LT, PL, PT)	• Post-entry: (AT, LT, PL, PT)
Temporary Protection	**5** (AT, DE, ES, IT, PL)	• **Qualification checks** linked to migration admission, with recognition requirements arising only at the stage of professional practice: (AT, DE, ES, IT, PL)	• In Parallel/ Post-entry: (AT, DE, ES, IT, PL)
Long term residence	**2** (PL, PT)	• **Qualification or skills checks arise only after status has been granted:** (PL, PT)	• Post-entry: (PL, PT)
ICT route	**6** (BE, CZ, FR, IE, LT, PL)	• Formal or documentary **verification of eligibility** (e.g. linked to the transfer position/conditions):	• Pre-entry: (BE, CZ, FR, IE, LT, PL)

In particular, the **EU Blue Card is the migration pathway most consistently associated with qualification-related eligibility requirements** (AT, BE, BG, CY, CZ, DE, EE, EL, ES, FI, FR, HR, HU, IT, LT, LU, LV, MT, NL, PL, PT, RO, SE, SI, SK). In all these Member States, access to the Blue Card requires applicants to demonstrate possession of a higher-education qualification, alongside other criteria such as a job offer and salary threshold. However, the way in which qualification checks are operationalised varies significantly across national systems. In **Austria**, **qualification and skills checks for the EU Blue Card are embedded directly in the migration decision**. The Public Employment Service (AMS) assesses formal qualifications, professional experience and comparability with Austrian education and training standards as part of the combined residence/work permit procedure, making qualification assessment a gate-keeping element of admission.[345] In **Germany**, **the EU Blue Card requires either a German qualification or a foreign qualification comparable to a German one**; labour market authorities are involved in approving employment in certain cases (e.g. bottleneck occupations), although recent reforms allow alternative entry routes where recognition may follow entry rather than precede it. In most other Member States, qualification checks under the EU Blue Card **take the form of formal or documentary verification of eligibility, rather than a substantive equivalence assessment embedded in migration procedures** (BE, BG, CY, CZ, EE, EL, ES, FI, FR, HR, HU, IT, LT, LU, LV, MT, NL, PL, PT, RO, SE, SI, SK). In these systems, migration authorities verify that the applicant meets the required education level and salary thresholds set out in law, while recognition for regulated professions or any other equivalence decisions are handled separately by education or sector-specific authorities and become decisive mainly as a precondition to access the EU Blue Card and subsequently for accessing the regulated professions. While the EU Blue Card establishes a harmonised requirement for applicants to hold qualifications, the assessment and recognition of those qualifications remain governed by national rules and therefore differ across Member States.

As concerns **skilled technical/VET level routes, checks** are reported in a defined group of Member States (BE, CZ, FR, IT, LT, MT, PL, PT). Across these Member States, the MPF evidence indicates that **checks are typically not framed as full equivalence assessments embedded in migration, but rather as eligibility/documentary requirements within the migration route and/or employer led suitability screening**. Malta stands out in this group, as it requires explicit skills validation for certain sector-specific labour migration routes, notably in healthcare and, more recently, tourism, through mandatory Skills Card or equivalent validation mechanisms applied at the pre-entry or permit stage. For a few Member States, qualification recognition (where pursued) is handled outside migration procedures by education/recognition bodies, while permits are processed through migration/labour authorisation chains (BE, FR). In Belgium, recognition is a separate track via NARIC structures and education authorities, with PES support (VDAB, Actiris, Le Forem), rather than embedded in the migration route. In France, work authorisation sits with DREETS, while recognition is handled via ENIC NARIC France and sectoral competent authorities, and prefectures do not assess equivalence of qualifications as part of residence permits.

As concerns **international protection**, **checks are reported** in a limited set of Member States (AT, LT, PL, PT). **Protection decisions are status-based**, so any **skills/qualification checks referenced arise only after entry** in relation to labour market access or professional practice rather than as part of the protection determination itself. Lithuania's system links qualification checking (when required) to the Employment Service.

[345] Migration Partnership Facility. Mapping Labour Migration Pathways in the EU: Austria. Available at: Resources - Migration Partnership Facility; targeted interview with one HR department

In Portugal, the MPF case study describes labour migration documentation as handled via SEF/AIMA and consulates for relevant routes, while qualification checks are not described as embedded in protection decisions.

In this context, in 5 Member States (AT, DE, ES, IT, PL), **Temporary protection beneficiaries,** may access the labour market without prior qualification checks linked to migration admission, with recognition requirements arising only at the stage of professional practice.

Beyond these core pathways, the MPF case studies also identify additional migration routes where qualification or skills considerations arise, though generally in a lighter or more indirect manner:

- **Job seeker or opportunity-based entry routes**, where qualification assessment is required as a condition for admission without a prior job offer (AT, DE);
- **Regularisation or status change pathways** based on duration of stay or employment history, where qualifications are not assessed as part of admission (ES, IT, PT);
- **Posted workers and project-based permits**, where checks focus on the existence of professional qualifications or experience linked to a specific assignment, rather than formal recognition or equivalence (AT, DE, FR, IT, SI);

Annex 8.3.3 The regulated/unregulated profession divide

In addition, the **type of profession** also determines the **extent** of qualifications and skills checks of TCNs. Many Member States require more extensive assessments for **regulated professions**, particularly in sectors such as **healthcare**. Indeed, most Member States mandate a **full assessment or equivalence procedure** for regulated professions (AT, CZ, DE, EE, EL, ES, FI, HU, IT, LT, LV, MT, NL, PL, PT, SE, SI, SK).[346] These procedures are **typically legally required to practise the profession rather than to obtain a residence or work permit and are usually carried out by profession-specific or education authorities** rather than migration authorities (AT, BE, BG, CZ, DE, EE, EL, ES, FI, FR, HU, IE, IT, LU, LT, LV, NL, PL, PT, RO, SE, SI, SK). As a result, recognition for regulated professions is generally institutionally and procedurally external to migration decision-making and often takes place after entry or in parallel with migration procedures (BE, BG, CY, DK, EE, ES, FI, FR, HU, IE, IT, LU, NL, PL, PT, RO, SE, SI, SK).[347]

Conversely, for **unregulated professions**, these requirements tend to be lighter. The **level of qualifications possessed by TCNs**, their **authenticity** and **relevance**, as well as TCNs' **professional experience** and other basic criteria are generally checked (see the figure below for more details, where darker blue refers to situations where these checks are systematically performed, whereas lighter blue refers to situations where these checks mentioned/applied but not systematically). While migration authorities commonly assess the level and authenticity of qualifications, and, in many cases, the associated professional experience, the relevance of the field of study and broader skills is not systematically

[346] EMN 2024. Ad-Hoc Query on recognition of third-country qualifications for the profession of doctor with basic medical training. Available at: Ad Hoc Query on the recognition of third-country qualifications for the profession of doctor with basic medical training | EMN; Survey targeted at migration authorities, Q8: "When your authority carries out or relies on skills and qualifications checks, which of the following elements are used as part of those checks?" n=48: Formal recognition decision required for the migration decision (17), Formal recognition decision requested due to later access to a regulated profession (21), Validation of skills (including non-formal or informal learning) (14), Professional experience check (33), Check of the level of qualification (27), Authenticity and validity check (29), Field of study relevance check (e.g. job-offer fit) (0), Language skills check (6), Other (5).

[347] See Table 32 for further details on the timing of qualification checks across migration pathways

evaluated. Where such assessments do take place, they are generally limited to specific high-skilled migration pathways (see Table 32), conducted indirectly through job–qualification alignment, or delegated to employers.

Table 33 - Criteria assessed for unregulated professions

Types of checks	AT	BE	BG	CY	CZ	DE	EE	EL	ES	FI	FR	HR	HU	IE	IT	LT	LU	LV	MT	NL	PL	PT	RO	SE	SI	SK
Check of level of qualification	■	■	■		■	■	■	■	■	■	■				■	■	■	■	■	■	■	■		■	■	■
Authenticity and validity check	■	■	■		■	■	■	■	■	■	■				■	■	■	■	■	■	■	■		■	■	■
Field of study relevance check	■				■	■			■	■	■				■	■	■	■	■	■		■		■	■	■
Skills assessment (tests etc)	■					■										■			■					■		
Professional experience check	■	■	■		■	■			■	■	■				■	■	■	■	■	■	■	■	■	■	■	■

■ Systematic checks
■ non-systematic checks

Source: author's own elaboration[348]

In many Member States no systematic or substantive assessment of qualifications or occupational competences is carried out for unregulated professions as part of migration procedures, with admission instead based on proxies such as salary thresholds, labour-market tests, occupation lists, quotas or employer sponsorship (BE, DK, EE, EL, ES, FI, FR, IE, IT, NL, PL, PT, RO, SE, SI). In these systems, the **assessment of job-related skills for unregulated professions is largely delegated to employers**, while public authorities focus primarily on regulating labour supply rather than validating competences (BE, BG, DK, EE, ES, IE, NL, PL, PT, RO, SE). More extensive or formal recognition requirements for unregulated professions arise only in the very few cases in which recognition is a condition to access certain migration routes for highly skilled workers (e.g. the EU Blue Card in CZ, NL, SK).[349] Outside these limited exceptions, the migration procedures generally do not function as comprehensive skills-validation mechanisms for unregulated professions (AT, BE, BG, HR, CY, DK, EE, EL, ES, FI, FR, HU, IE, IT, LV, LT, LU, MT, NL, PL, PT, RO, SE, SI, SK).

Annex 8.3.4 Methods, documentation and evidence (merge current methods and documentation subsections) annex 9.3

The methods for assessing qualifications and skills vary across Member States but also depending on the type of profession, with a particular differentiation between regulated and unregulated professions.

Qualifications and skills checks are most commonly carried out through **in-house document reviews** performed by migration authorities. This applies in particular to checks related to **formal recognition** required for decisions related to migration pathways for highly-skilled or technically qualified TCNs (AT, BE, BG, DE, EE, EL, FR, HU, IT, LT, LU, LV, PL, PT, SE, SI), **professional experience verification** (BE, FR, HU, LT, PL, PT), and **authenticity checks** (AT, BE, BG, CZ, FR, HU, IE, LT, PL, PT).[350]

[349] EMN 2024. Ad-Hoc Query on Recognition of documents in unregulated professions. Available at: 275fd410-99bc-41fc-b383-66977c9510e0_en; EMN 2024. Ad-Hoc Query on recognition of third-country qualifications for the profession of doctor with basic medical training. Available at: Ad Hoc Query on the recognition of third-country qualifications for the profession of doctor with basic medical training | EMN

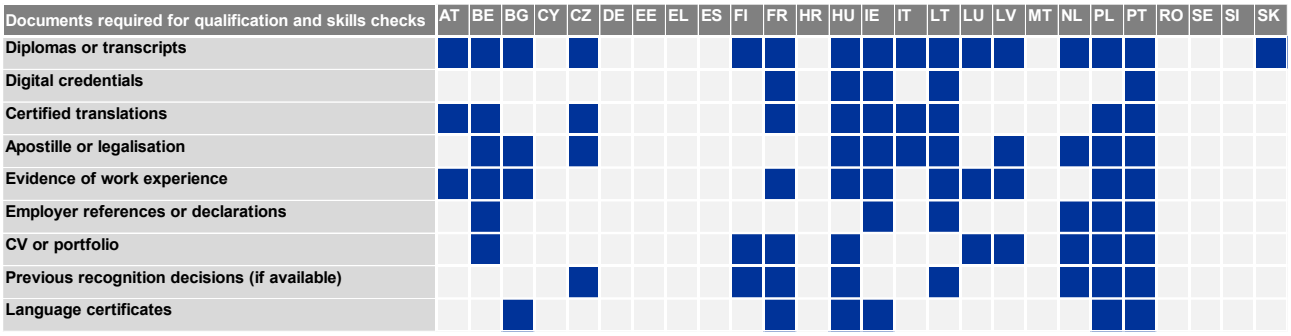
[350] Survey targeted at migration authorities, Q10: "For each type of check selected in Question 8, how is it most commonly handled?" n=48; EMN 2024. Ad-Hoc Query on Recognition of documents in unregulated professions. Available at: 275fd410-99bc-41fc-b383-

Conversely, for checks linked to **accessing regulated professions**, most Member States either rely on **ENIC-NARIC centres** and **formal recognition bodies** (AT, BE, BG, CZ, DE, EL, FI, IT, LT, PL, PT, SK) or on **professional regulators** responsible for recognition within their respective sectors (AT, BE, BG, FI, FR, HU, IT, LT, LU, LV, PL, PT, SE).[351] In addition, 10 Member States rely also on **employers' confirmation** of labour market authorities' input (AT, BE, BG, EE, ES, FI, HU, IT, LT, LV).

In terms of **volume** of **evidence and documentation** required, only two Member States (PL, PT) require all six types of documents considered including diplomas and transcripts, evidence of work experience, employer references or declarations, CV or portfolio, previous recognition decisions and language certificates (PL, PT), with Portugal also accepting digital credentials. This is followed by France and Hungary requesting five different types of documents and Belgium, Ireland, Lithuania and the Netherlands requesting four different types (see Figure 29 for a complete overview).

In terms of types of documents, 16 Member States (AT, BE, BG, CZ, FI, FR, HU, IE, IT, LT, LU, LV, NL, PL, PT, SK) consider **diplomas and transcripts** when assessing the qualifications and skills of TCNs through their migration authorities. This is followed by **evidence of work experience**, requested by 11 Member States (AT, BE, BG, FR, HU, IE, LT, LU, LV, PL, PT), and CV or portfolio requested by nine Member States (BE, FI, FR, HU, LU, LV, NL, PL, PT). For what concerns formal requirements, **legalisation and apostilles** are required by 11 Member States (BE, BG, CZ, HU, IE, IT, LT, LV, NL, PL; PT), while **certified translations** are required by 10 Member States (AT, BE, CZ, FR, HU, IE, IT, LT, PL,PT).[352] The figure below provides an overview of the volume and types of documentation and formal requirements typically requested by migration authorities across the different Member States according to the survey targeted at migration authorities.[353]

Figure 29 - Documentation or evidence typically requested for skills or qualification checks



Source: author's own elaboration

66977c9510e0_en; Migration Partnership Facility. Mapping Labour Migration Pathways in the EU. Available at: Resources - Migration Partnership Facility; identità – expatriats unit (MT). Available at: Expatriates Unit Highly Qualified Individuals - Blue Card - Identità.

[351] Survey targeted at migration authorities, Q10: "For each type of check selected in Question 8, how is it most commonly handled?" n=48; EMN 2024.; Migration Partnership Facility. Mapping Labour Migration Pathways in the EU. Available at: Resources - Migration Partnership Facility; targeted interview with one Public Employment Service

[352] Survey targeted at migration authorities, Q11: "What documentation or evidence is typically requested when skills or qualification checks are required? (Select all that apply)" n=48; EMN 2024. Ad-Hoc Query on Recognition of documents in unregulated professions. Available at: 275fd410-99bc-41fc-b383-66977c9510e0_en; Migration Partnership Facility. Mapping Labour Migration Pathways in the EU. Available at: Resources - Migration Partnership Facility

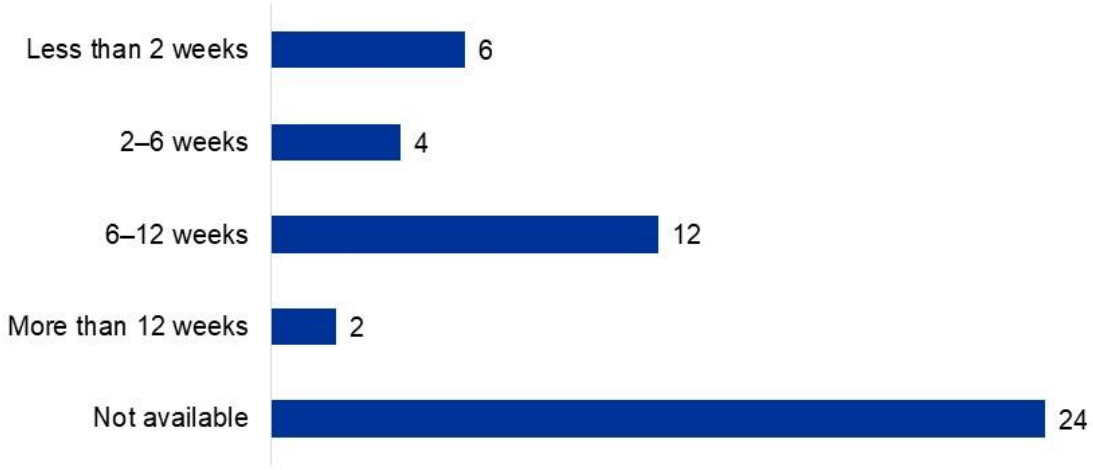
[353] Survey targeted at migration authorities, Q11: "What documentation or evidence is typically requested when skills or qualification checks are required? (Select all that apply)" n=48; Ad-Hoc Query on Recognition of documents in unregulated professions. Available at: 275fd410-99bc-41fc-b383-66977c9510e0_en; Migration Partnership Facility. Mapping Labour Migration Pathways in the EU. Available at: Resources - Migration Partnership Facility

Annex 8.3.5 Timelines

Regarding timelines for qualifications and skills checks performed throughout migration pathways, both the survey findings and the desk research point to a significant lack of clarity regarding the expected duration of qualification and skills checks within migration procedures.

This is further evidenced by the fact that 50% of the migration authorities consulted indicated that the **additional time attributable to such checks is unknown** (AT, CZ, FR, IE, IT, LT, MT, PL, PT, SK, SE).[354]

Figure 30 - What is the typical additional processing time attributable to skills or qualification checks?



Source: author's own elaboration

Despite these information gaps, the available evidence allows for the formulation of an indicative timeline for the qualification and skills checks carried out as part of migration processes. Across the Member States, **statutory processing times** for work-related residence permits tend to fall within a **general range of 6 to 12 weeks** for most categories and Member States (CZ, DE, EE, EL, FR, HR, IT, LU, LT, LV, NL, PL, RO).[355] This constitutes the **baseline timeline** applied to the majority of standard employment-related applications, such as Single Permits, general residence permits linked to work. A smaller group of Member States applies **shorter indicative deadlines** (FI, LV, HR), while others retain more flexible or non-published timeframes (IE, PT).[356]

For example, the **EU Blue Card** tends to benefit from **equal or shorter processing times** compared to other permit routes. Several Member States apply **specific maximum deadlines** for Blue Cards, often **30, 60 or 90 days**, depending on national legislation (FR,

[354] Survey targeted at migration authorities, Q16: "What is the typical additional processing time attributable to skills or qualification checks?" n=48

[355] Survey targeted at migration authorities, Q16: "What is the typical additional processing time attributable to skills or qualification checks?" n=48; EMN 2024. Ad-Hoc Query on Recognition of documents in unregulated professions. Available at: 275fd410-99bc-41fc-b383-66977c9510e0_en; Migration Partnership Facility. Mapping Labour Migration Pathways in the EU. Available at: Resources - Migration Partnership Facility

[356] EMN 2024. Ad-Hoc Query on Recognition of documents in unregulated professions. Available at: 275fd410-99bc-41fc-b383-66977c9510e0_en; Migration Partnership Facility. Mapping Labour Migration Pathways in the EU. Available at: Resources - Migration Partnership Facility

DE, CZ, HR, SE). In certain cases (CY, DE, FR, LV), Blue Card applications can fall under **fast-track or priority procedures**, resulting in shorter expected timelines.[357]

By comparison, **Single Permits** and **general employment permits** typically face longer or more variable timelines, especially where labour-market tests, employer approvals or complex eligibility checks are required (CY, HU, FR, LU, SE). Seasonal work permits are usually processed more quickly, while the example of ICT permits mirror the Blue Card in terms of statutory deadlines (CZ, DE, LU, SK).[358]

Another substantial difference in terms of timeline stands in whether the qualification and skills checks happen **before the migration procedure** is concluded (50% - BE, CZ, FR, HU, LT, PL, PT, SK, SE), or **in parallel to the migration procedures** (14.6% - HU, IE, NL, PL). This may obviously differ across migration routes and pathways (14.6% - AT, BG, HU, LT, PL, PT). [359]

Annex 8.3.6 Costs and fees

While most migration authorities do not levy fees for skills and qualifications checks within migration routes, costs may nonetheless arise for applicants depending on the type of professions (e.g. regulated and unregulated) and the specific requirements embedded in the migration pathway. This may occur, for instance, when formal recognition must be obtained so the migration procedure can advance (e.g. the EU Blue Card in CZ, NL, SK), or when the CA responsible for verifying qualifications is not the migration authority (mainly migration pathways specific for regulated professions). This distinction is important, as both the type of authority conducting the assessment and the characteristics of the migration pathway can determine whether applicants are exposed to additional financial burdens.

Survey results indicate that 95.8% of migration authorities (AT, BE, BG, CZ, FR, HU, IE, IT, LT, MT, PL, PT, SE, SK) reported **no fees specifically linked to skills and qualifications checks within migration procedures**, while no Member States mentioned fees applied to TCNs by directly by migration authorities.[360]

However, five Member States (AT, LT, NL, PL, PT) reported the presence of fees **not charged by migration authorities**, but rather by **other public bodies or professional regulators**. Indeed, **fees charged by other public authorities** were reported in four Member States (AT, LT, PL, PT – e.g. PL, **EUR 130**), while **fees charged by professional regulators** were indicated in two Member States (**EUR 127** in HU and **EUR 150** in NL).[361]

[357] EMN 2024. Ad-Hoc Query on Recognition of documents in unregulated professions. Available at: 275fd410-99bc-41fc-b383-66977c9510e0_en; Migration Partnership Facility. Mapping Labour Migration Pathways in the EU. Available at: Resources - Migration Partnership Facility

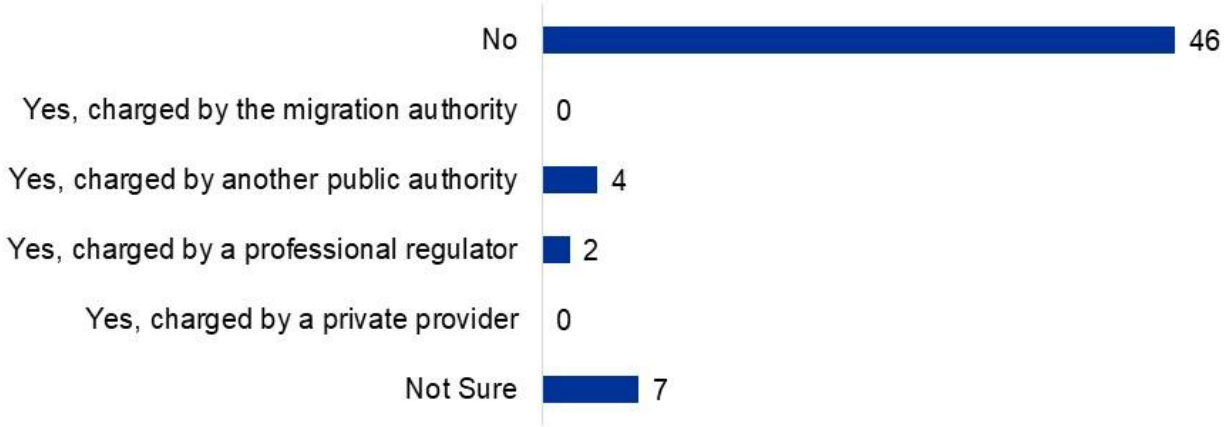
[358] EMN 2024. Ad-Hoc Query on Recognition of documents in unregulated professions. Available at: 275fd410-99bc-41fc-b383-66977c9510e0_en; Migration Partnership Facility. Mapping Labour Migration Pathways in the EU. Available at: Resources - Migration Partnership Facility ; [358] Survey targeted at migration authorities, Q16: “What is the typical additional processing time attributable to skills or qualification checks?” n=48

[359] Survey targeted at migration authorities, Q15: “Q15. When skills or qualification checks are required, how are they processed?” n=48

[360] Survey targeted at migration authorities: Q.17: “Are there specific fees related to skills or qualification checks?” n=48.

[361] Survey targeted at migration authorities: Q.17: “Are there specific fees related to skills or qualification checks?” n=48.

Figure 31 - Are there specific fees related to skills or qualification checks?



Source: author's own elaboration

Annex 8.3.7 Missing documentation — a structural vulnerability

Cases of missing or incomplete documentation may arise for several reasons, including situations involving refugees, undocumented migrants, or TCNs who have lost contact with their country of origin and therefore face significant hurdles in retrieving the required documents.[362] In such instances, migration authorities across Member States adopt different approaches.

According to survey responses, the majority of migration authorities do not have mechanisms in place to address these gaps. As a result, in most cases it is not possible to proceed with the application (64.6% – BE, BG, CZ, FR, HU, IE, IT, LT, NL, PL, PT, SK). However, some exceptions exist. In certain Member States, applications may still move forward when partial documentation is available, provided that the evidence is deemed sufficient (29.2% – BE, HU, LT, PL, PT). Other Member States may refer applicants to another authority or specialised service capable of completing the assessment (27.1% –AT, HU, LT, PL, PT). Lastly, only a few authorities may issue a request for additional documentation (6.3% – FR, PL, SE), thereby offering applicants an opportunity to supplement incomplete files, or accept a self-declaration by the applicant (6.3% – HU, PL, PT).[363]

While these mechanisms can provide support to TCNs facing difficulties in retrieving documentation, in most cases the absence of required documents prevents progression to formal recognition procedures. This is particularly critical for access to regulated shortage professions or visa pathways for highly skilled workers, where complete and verified documentation remains a strict prerequisite.

Annex 8.4 An estimation of the burden borne by TCNs vis a vis the recognition outcomes

This final section provides an **estimate of the burden borne by TCNs** when undergoing recognition procedures in the EU, considering both **financial costs and processing times**. It also examines the outcomes of these procedures in order to assess the overall efficiency of the system, in particular by comparing the burden incurred with the likelihood of obtaining recognition and gaining access to the labour market.

The analysis indicates that, while recognition procedures entail a non-negligible financial and time burden for applicants, these do not consistently translate into positive recognition decisions or improved labour market outcomes. This suggests the presence of structural inefficiencies in the current system.

[362] Targeted interviews with four CSOs, two IOs and one Focus Group with Individual TCNs

[363] Survey targeted at migration authorities, Q12: “How are cases with missing or incomplete documentation usually handled? (Select all that apply)” n=48

The tables below provide an overview of the estimated burden borne by TCNs when undergoing the recognition process when coming to the EU, as estimated in Annex 4.1 .

Table 34- Estimated financial burden borne by TCNs

Burden	Estimated cost
Fees borne by TCNs	1530 EUR
Average length of recognition procedures for TCNs Average length of the full recognition journey for TCNs (from document gathering to final outcome), regulated professions	14.2 months

Source: author's own elaboration based on the surveys targeted at CAs and TCNs

On average, a TCN with TCQ coming to the EU will bear costs of around 1500 EUR, calculated as a weighted average across the recognition pathways- (see Annex 4.1 to recognise his/her qualifications and will take approximately 14.2 months.

In order to capture the **overall burden faced by TCNs** when undergoing recognition procedures, a **Recognition Burden Index (RBI)** is by combining the two main dimensions of burden: **financial costs** and **procedural duration**.

The RBI is constructed combining monetary costs and procedural duration. Both variables were normalised on a 0–1 scale using minimum and maximum values of costs (EUR 0 – EUR 2500) and timelines (0–36 months) as follows (see Annex 4.1):

- $C = \frac{1530-0}{2500-0} = \frac{1530}{2500} = 0.612$
- $T = \frac{14.2-0}{36-0} = \frac{14.2}{36} = 0.39$
- $RBI = 100 * (0{,}5 * 0.612 + 0{,}5 * 0.39)$

The **index yields a value of 50,1** (on a 0–100 scale), indicating the existence of a burden for applicants, **with financial costs representing a slightly stronger driver of overall burden than duration**.

Table 35 – Outcome of the recognition procedures and impact on TCNs [364]

Outcomes	Rate
Recognition outcomes	
Successful recognition rate	27,9%
Partial recognition rate	23,5%
Rejection rate	9,8%
Withdrawal due to length	11,5%
Labour market outcomes	
It allowed TCNs to obtain a job that matched or exceeded their qualification level.	11,3%
It led the TCNs to change field/ accept a job below their qualification level	27,9%

Outcomes	Rate
It resulted in a missed job opportunity	15,5%
It caused delays in starting a job	13,4%

In terms of impact, the survey highlights that, while the majority of TCNs (51,4%) obtained a positive outcome, with either a full (27,9%) or partial (23,5%), only 11,3% experienced a positive impact of the recognition process (i.e. allowed to obtain a job matching their qualifications), while the rest of TCNs were either overqualified or experience delays and missed opportunities due to the complexity and length of recognition procedures.

In order to consider the outcome and subsequent impact of recognition procedure on TCNs according to this mapping, an **Outcome Quality Score (OQS)** is constructed in order to measure the effectiveness of recognition processes considering both the **formal outcome of recognition decisions** and the **subsequent labour market impact**.

Recognition and labour market outcomes categories were defined and assigned to a quality weight between 0 and 1, reflecting its desirability from the perspective of effective recognition and labour market integration as follows:

- Recognition outcomes:
  - Successful recognition: 1,0
  - Partial recognition: 0,6
  - Rejection/Withdrawal due to length: 0,0
- Labour market outcomes:
  - Job matched/exceeded qualification level:1.0
  - Job below qualification level: 0.3
  - Delays in starting a job: 0.2
  - Missed job opportunity: 0.0

Consequently, each sub-score (i.e the recognition decision score (RDS) and the labour market score (LMS)) is calculated as a weighted average of outcome rates (i.e. Score=100×∑(pi*·wi), considering the share of respondents (pi) and the assigned weights (wi). As a result, the **RDS yields to 42,0**, while **the LMS yields to 22,35.**

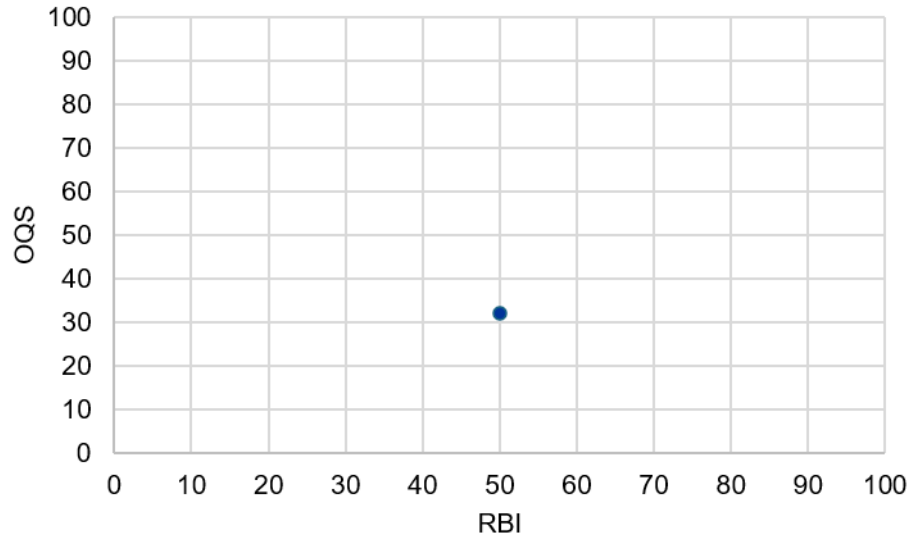
These sub scored reflecting recognition and labour market outcomes shall finally be aggregated in order to capture the overall outcome score of recognition procedures. Aggregation is carried out using equal wights simply as an average of the two scores, yielding to an **Overall Outcome Score (OQS)** of 32.18. The OQS reflects the overall effectiveness of recognition systems. A value of 32.18 indicates that **positive outcomes are limited**, particularly in terms of labour market integration.

Lastly, it is substantial to understand whether the overall outcomes achieved through recognition are commensurate with the burden faced by TCNs. To do so a Burden-Outcome

Efficiency indicator (BOEI) is constructed, simply as a ration between the OQS and the RBI, yielding to an overall BOEI **equal to 0,64.**

Values below 1 suggest that outcomes of recognition processes are weak relatively to the burden faced by TCNs.

Figure 32 - Burden-Outcome efficiency indicator



Source: author's own elaboration

In the Burden–Outcome plane, the **EU-average point is located in the lower-right quadrant**, though close to the centre. This positioning indicates that the burden faced by applicants in terms of costs and processing times is high (with RBI > 50), though its proximity to the centre suggests that it should not be regarded as excessive. However, the quality of outcomes, particularly with regard to effective labour market integration, remains low. Taken together, **this pattern suggests that the level of effort and resources required from applicants is not matched by commensurate benefits**. In other words, high levels of burden are associated with weak outcomes. The chart therefore points to an efficiency gap in the system, where existing procedures generate costs and delays without consistently delivering strong recognition results or facilitating adequate labour market matching. This suggests scope for improving the efficiency of recognition procedures, notably by reducing procedural frictions and strengthening the link between recognition decisions and actual labour market outcomes, so that benefits more closely align with the burden borne by TCNs.

Annex 8.5 Conclusion

In conclusion, the mapping highlights that qualification checks for TCNs in the EU are carried out through two distinct but coexisting procedural tracks: formal recognition procedures for access to regulated professions, governed by professional regulatory frameworks and implemented by CAs, and qualification and skills checks embedded in migration admission

procedures, carried out by migration authorities to assess eligibility for entry and residence, particularly under high-skilled migration pathways.

Overall, **formal recognition procedures carried out by CAs** display significant variation across EU Member States. Available evidence suggests that the average duration of these procedures is around 14.2 months, with the number of required documents typically lying over 6, and average costs estimated at approximately 1530 EUR. By contrast, **qualification checks within migration procedures** are primarily conducted in the context of high-skilled migration pathways and schemes. These checks generally add an estimated 6 to 12 weeks to the overall duration of the migration process and are, in most cases, provided free of charge.

While these two tracks are based on different legal and administrative frameworks, they operate largely independently from one another and do not systematically align or interact. As a result, TCNs may be required to engage with parallel processes across the admission and integration continuum.

The mapping further shows that these procedures are characterised by varying timelines, documentation requirements, and formal conditions, as well as differing cost structures across Member States and professions. Taken together, these elements contribute to a fragmented procedural landscape in which applicants must navigate multiple sets of requirements, depending on the pathway pursued and the profession concerned.

Annex 8.6 Appendix 1 - Application fees per professional categories across EU Member States[365]

The table below provide an overview of t

MS	Profession	Fee
Health professions		
AT	Doctors, Dentists, Nurses, Midwives, Pharmacists	0 €
HR	Doctors	132.72 €
HR	Dentists	1,466.59 €
HR	Nurses	53.09 €
HR	Midwives	796.34 €

[365] Survey targeted at CAs, Q17. “What type of costs are typically incurred by third country nationals for recognition of qualifications?” (Select all that apply) (n=190); EMN, 2024. Ad-Hoc Query 2024.16 on Recognition of third-country qualifications for the profession of doctor with basic medical training

MS	Profession	Fee
HR	Pharmacists	212.36 €
EE	Doctors, Dentists, Nurses, Midwives, Pharmacists	260 €
FI	Doctors, Dentists, Nurses, Midwives, Pharmacists	1,390–2,028 €
DE	Doctors, Dentists, Pharmacists	400–500 €
DE	Nurses, Midwives	100–250 € (depending on procedure / authority)
IE	Nurses, Midwives	350 €
IT	Health professions	0 €
LT	Doctors	0 € (recognition); licensing fee applies
LV	Doctors	100-200 €
LU	Doctors	0 €
MT	Doctors	0 €
NL	Doctors	1,971 €
NL	Dentists	1,520 €
NL	Pharmacists	100 €
NL	Nurses, Midwives	85 €
PL	Doctors	PLN 1,682.10 in 2026; maximum fee, 35% of minimum wage
PT	Doctors, Nurses, Dentists, Midwives, Pharmacists	140 €
RO	Doctors, Nurses, Dentists, Midwives, Pharmacists	20 €
SI	Doctors, Nurses, Dentists, Midwives, Pharmacists	22.60 €
ES	Doctors, Nurses, Dentists, Midwives, Pharmacists	300 €
SE	Doctors, Nurses, Dentists, Midwives, Pharmacists	990 SEK (or 3,300 SEK in some cases)
Healthcare assistants		

MS	Profession	Fee
AT	Healthcare assistants	50–200 € (most frequently 150 €)
DE	Healthcare assistants	225 €; some procedures 800–2,500 €
IE	Healthcare assistants	350 €
MT	Healthcare assistants	0 €
NL	Healthcare assistants	0–100 €
PT	Healthcare assistants	Not applicable / 0 €
RO	Healthcare assistants	0–20 €
SE	Healthcare assistants	990 SEK
Architects, engineers, technical professions		
AT	Architects, engineers	According to BAO (variable); often 0 €
EE	Architects, engineers	130 €
HR	Architects	400 €
LT	Architects	340 €
LU	Architects, engineers	50–75 €
NL	Architects	0–75 €
PL	Architects	"same as Polish procedure"
PT	Architects	295 €
RO	Architects	100 € (+100 € in some cases)
SI	Architects, engineers	39 €
ES	Engineers	163.22 €
Education and teaching		

MS	Profession	Fee
AT	Education	50 €
EE	Education	0 €
FI	Education	495 €
IE	Teaching	200 € (teacher education); 100 € per subject
LU	Education	75 €
NL	Education	75 €
PL	Education	0 €
PT	Education	50 €
ES	Education	166.50 €
SE	Education	1,890 SEK
Social workers and social care		
AT	Social workers	~300 €
MT	Social workers	30 €
PT	Social workers	0 €
RO	Social workers	0–300 €
Business (e.g accountant, tax advisors), legal (e.g. attorneys, judicial experts, notaries), transport and logistics (e.g. drivers, shipping) , industrial trades and craft (e.g. manufacturing, retail)		
FR	Business professions	Free
IT	Trades, business, transport	16–32 € (+ stamp duty in some cases)
LU	Business, trades	50–75 €
PL	Regulated professions (general rule)	35% of minimum wage (1,682.10 PLN in 2026)
ES	Legal professions	46.69 €
PT	Engineering professions	39–78 €

MS	Profession	Fee
SE	Veterinary, construction, education	1,890 SEK

Annex 9. Validation of skills of TCNs across EU Member States

Annex 9.1 Introduction

The **validation of skills** concerns the assessment of the ability to apply knowledge and use know-how to complete tasks and solve problems.[366]

Consultations conducted throughout the course of the study on the recognition of qualification and validation of skills of Third Country Nationals (TCNs) show that validation of skills does not yet function as a sufficiently visible, trusted and interoperable mechanism across Member States,[367] and even less so with regard to skills acquired in third countries. It tends to happen in a severely fragmented manner across and within Member States, and often remains at the level of employers, rather than formal recognition authorities and bodies (i.e. ENIC NARIC centres and Competent Authorities (CAs) for recognition of qualifications).[368]

The following sections will provide an overview of authorities' involvement in the validation of skills and the recognition of non-formal and informal learning, showcasing the existing high level of fragmentation across EU Member States, as well as the most common methods and practices employed to validate skills of TCNs, concluding that validation mechanisms are not sufficiently mature or widely embedded to support effective EU-level intervention.

Annex 9.2 CAs for recognition and relevant recognition bodies' involvement in validation of skills

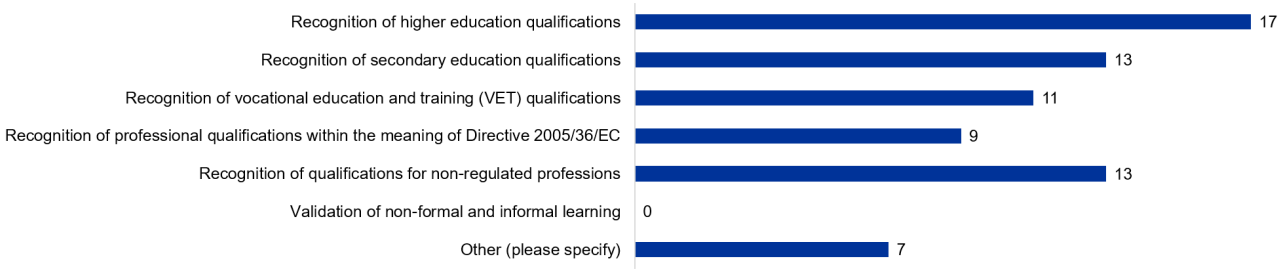
For TCNs, validation can play an important role in making skills acquired outside formal education, and often outside the EU, more visible, documented and, in some cases, certifiable. The 2012 Council Recommendation[369] established a common policy framework for validation, but implementation across Member States remains uneven and, in practice, remains limited and confined to the informal level.[370]

As already noted, **the validation of skills for TCNs largely remains confined to an informal or level**, as its value depends heavily on whether validation leads to recognised credentials, whether these are linked to NQFs, and whether labour market actors understand and accept them.[371] This reflects the institutional remit of the main bodies responsible for recognition across EU Member States, namely the ENIC-NARIC centres and

[366] CEDEFOP (2014). Terminology of European education and training policy: https://www.cedefop.europa.eu/files/4117_en.pdf
[367] Internal source provided by DG EMPL (Action 1)
[368] In non-regulated professions, the decision whether to require the TCN to seek formal recognition of her foreign-acquired qualifications rests with the employer. Targeted interviews with 3 HR departments and 3 EU organisations of employers
[369] Council of the European Union (2012), Council Recommendation of 10 July 2012 on the National Reform Programme 2012 of Belgium and delivering a Council opinion on the Stability Programme of Belgium, 2012–15, OJ C 219, 24.7.2012. Available at: eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:C:2012:219:0005:0008:EN:PDF
[370] Internal source provided by DG EMPL (Action 1); Villalba-Garcia, E. (forthcoming). Validation supporting an EU wide Skills Portability System. Cedefop working papers
[371] Internal source provided by DG EMPL (Action 1)

CAs for access to regulated and non-regulated professions, which focus on the recognition of formal qualifications and certified learning and do not carry out validation of non-formal or informal learning. This is confirmed by evidence from the survey targeted at ENIC-NARIC centres: **none of the 18 responding ENIC NARIC centres (**BE, BG, EE, EL, ES, FI, FR, HU, IE, IT, LT, LV, NL, NO, RO, SE, SI, SK) **reported validating non-formal or informal learning**, despite being actively involved in the recognition of a broad range of formal qualifications and certifications.[372] As a result, skills acquired through work experience, on-the-job training, or other informal pathways tend to fall outside established recognition frameworks, reinforcing reliance on *ad hoc* or employer-led assessments rather than systematic, authority-based validation mechanisms (see Figure below).

Figure 33- For which of the following areas does your NARIC centre have responsibility in relation to the recognition of qualifications and skills of TCNs? (n=18)



Source: author's own elaboration based on the survey targeted at ENIC-NARIC centres

Only in few cases NARIC centres has taken a proactive approach towards the validation of skills, i.e. the Netherlands' NARIC centre launched a pilot project on skills validation,[373] and the Piedmont Region in Italy has piloted a project on skills validation at provincial level.[374] Nonetheless, these initiatives remain at an experimental stage and, more importantly, they remain at regional or provincial without resulting in a national framework for formal recognition of skills comparable to the one existing for recognition of qualifications.

In a similar manner, **CAs in charge of recognition of qualifications to access regulated professions do not engage in formal validation of skills while extensively engaging the recognition of qualifications and relevant formal certifications**. Skills tests or professional assessment are used for applications of TCNs when lacking complete documentation only in 10.5% of CAs surveyed (AT, DE, LV, MT, PL, SE).[375]

This low uptake appears to be closely linked to cost considerations. Stakeholders consistently reported **limited use of validation mechanisms**, driven both **by low awareness and by a prevailing perception that the process yields few tangible**

[372] Survey targeted at ENIC-NARIC centres, Q3: "For which of the following areas does your NARIC centre have responsibility in relation to the recognition of qualifications and skills of third-country nationals (TCNs)? (Select all that apply)" n=18; and Q14: "Does your NARIC centre have any role in the validation of non-formal or informal learning of TCNs?"(n=18)
[373] Survey targeted at NARIC centres, Q14.a: "Does your NARIC centre have any role in the validation of non-formal or informal learning of TCNs? If *other*, please specify" (n=18)
[374] Focus Group on Attracting Talent and Recruitment with HR departments, EU associations of employers and Talent Partnerships stakeholders
[375] Survey targeted at CAs, Q27: "How are cases handled when third-country national applicants lack complete documentation (e.g. refugees/displaced persons)?" (n=190).

benefits.[376] As a result, demand for validation services remains weak. At the same time, the **administrative and operational costs associated with maintaining validation systems are often significant**.[377] In this context, several smaller providers have assessed that sustaining such services is not economically viable. This dynamic contributes to a self-reinforcing cycle, whereby limited demand and high costs lead to reduced service provision, which in turn lowers visibility and awareness, further weakening uptake and limiting the resources available to support the labour market integration of mobile workers, including TCNs.[378]

Overall, **skills validation largely remains within the informal spectrum, with skills checks—rather than formal validation—often embedded in the procedures carried out by migration authorities when issuing visas and work permits**. These checks typically aim to verify the plausibility of qualifications or professional experience, rather than to formally validate skills acquired through non-formal or informal learning pathways. They are performed by a majority of migration authorities surveyed (29 out of 48), spread across 10 Member States (AT, BE, CZ, FR, HU, IE, LT, NL, PL, PT), which reported **systematically conducting skills and qualification checks as part of specific labour migration procedures**.[379] Other nine migration authorities out of 48, operating in four Member States (BG, LT, PL, PT), indicated that such checks are carried out only occasionally. By contrast, other 10 migration authorities out of 48 across seven Member States (HU, IT, LT, MT, PL, SK, SE) stated that they do not conduct any skills or qualification checks at all within their procedures.[380]

Skills and qualification checks performed by migration authorities may subsequently be taken into account by CAs responsible for access to regulated professions. However, this practice is far from systematic. According to the survey, migration authorities' checks are considered in all cases by only 11.0% of CAs (AT, EE, FR, DE, IE, IT, LT, LU, MT, NL, PL, PT), only occasionally by 5.5% (AT, LT, NL, PT, RO), and not at all by 24.9% of CAs (AT, BE, ES, FI, FR, DE, HU, IE, IT, LT, MT, NL, PT, RO, SI, SE).[381]

Within this broader picture, more targeted validation of non-formal and informal learning remains particularly limited, concerning only 14 migration authorities out of 48 surveyed, located in five Member States (BE, BG, LT, PL, PT).[382]

[376] Internal source provided by DG EMPL (Action 1)

[377] Internal source provided by DG EMPL (Action 1)

[378] Internal source provided by DG EMPL (Action 1)

[379] Survey targeted at Migration Authorities , Q4: "Does your authority conduct or rely on skills and qualification checks as part of labour migration procedures?" (n=48)

[380] Survey targeted at Migration Authorities , Q4: "Does your authority conduct or rely on skills and qualification checks as part of labour migration procedures?" (n=48)

[381] Survey targeted at CAs, Q33: "Do you take into account prior qualification recognition or skills assessment conducted for migration/residence/work permit purposes in your Member State?" n=190

[382] Survey targeted at migration authorities, Q8: " When your authority carries out or relies on skills and qualifications checks, which of the following elements are used as part of those checks? (Select all that apply)" (n=48)

Annex 9.3 Fragmentation of validation of skills across and within EU Member States

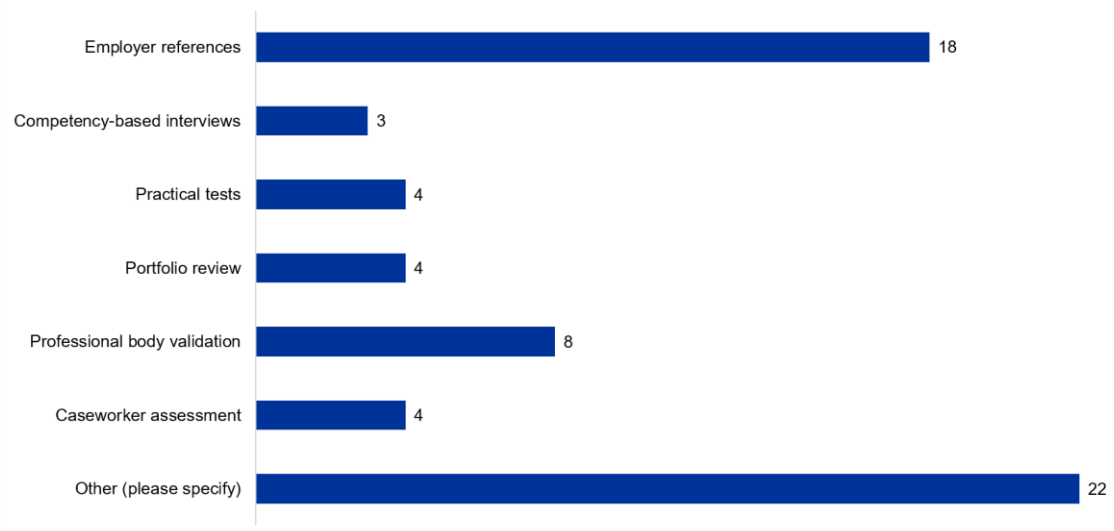
Although some form of validation arrangement exists in almost all EU Member States, these systems differ significantly in their scope, coverage, governance and accessibility.[383] Only a limited number of Member States provide comprehensive coverage across all major education and training systems.[384]

In practice, fragmentation in systems for validation of skills is compounded by differences within Member States, where **responsibilities** may be divided across regions, sectors or even individual employers.[385] Besides responsibilities being scattered across different authorities and levels, skills validation displays a high degree of fragmentation across several other dimensions, including **how validation is carried out, the methods applied, and the time required to complete the process**. This fragmentation largely stems from the fact that, while the recognition of qualifications has become increasingly formalised at both EU and national levels, although remaining highly fragmented, the validation of skills continues to be predominantly non-formalised and employer-driven.

As a matter of fact, even the few cases in which migration authorities assess and validate skills have shown a **high degree of variance in the processing time for the skills and qualification checks across EU Member States**, ranging from less than 2 weeks in 6 migration authorities out of 48 surveyed (BE, PT) to more than 12 weeks in two Member States (HU, PL), with the majority lying between 6 and 12 weeks (12 migration authorities out of 48 surveyed spread in three Member States (LT, NL, PL).[386] Similarly, **a high degree of variation is also found regarding the methods used to perform skill checks**, with most respondents declaring to rely upon employers (BE, HU, IE, LT, PL, PT).[387]

[383] Internal source provided by DG EMPL (Action 1)
[384] Internal source provided by DG EMPL (Action 1); In non-regulated professions, the decision whether to require the TCN to seek formal recognition of her foreign-acquired qualifications rests with the employer. Targeted interviews with 3 HR departments and 3 EU organisations of employers
[385] Internal source provided by DG EMPL (Action 1)
[386] Survey targeted at migration authorities, Q16: " What is the typical additional processing time attributable to skills or qualification checks?" (n=48)
[387] Survey targeted at Migration authorities, Q13: "If your authority carries out validation of skills or experience (Type C - see the background section), which methods are used? (Select all that apply)" (n=48)

Figure 34 - If your authority carries out validation of skills or experience, which methods are used? (n=48)



Source: author's own elaboration based on the survey targeted at Migration Authorities

Beyond cross-country differences, significant fragmentation also exists within Member States.[388] CAs responsible for different regulated professions apply skills, qualification, and a priori assessments conducted by migration authorities in divergent ways. In several Member States (AT, FR, LT, NL, PL, PT, RO), some CAs consistently rely on prior skills or qualification checks, while others do so only sporadically or not at all.[389] This divergence points to structural weaknesses in national skills-validation systems and highlights the lack of harmonised and robust frameworks governing the use of existing assessments even within Member States.

Annex 9.3.1 Validation of skills performed by employers

In practice, the **validation of skills currently relies almost entirely on individual employers**.[390] In most cases, large companies assess and validate skills directly in third countries, either by deploying dedicated human-resources staff on site or by relying on specialised recruitment agencies and certified partners.[391]

In some Member States, more advanced partnerships have been established with specific third countries. For example, Finland has developed cooperation arrangements with the Philippines, whereby Finnish companies work closely with local recruitment agencies, with the International Labour Organisation (ILO) acting as a facilitator between employers and TCNs.[392] Similarly, other large companies apply comparable recruitment models, relying on

[388] Targeted interview with two EU professional associations, three EU association of employers, two CSOs, three HR departments , two IOs

[389] Survey targeted at CAs, Q33: "Do you take into account prior qualification recognition or skills assessment conducted for migration/residence/work permit purposes in your Member State?" n=190

[390] Targeted interview with two EU professional associations, three EU association of employers, two CSOs, three HR departments, two IOs; Focus group on attracting talent with HR departments and talent partnerships stakeholders (n= 27).

[391] Targeted interview with two EU professional associations, three EU association of employers, two CSOs, three HR departments, two IOs; Focus group on attracting talent with HR departments and talent partnerships stakeholders (n= 27)

[392] Targeted interview with one HR department

certified partners located in third countries to conduct preliminary assessments of candidates' skills.[393]

Under this model, it is either the recruitment agency mandated by the EU-based company, or the company itself, primarily in the case of large, well-established European businesses, that conducts the skills assessment directly in the third country and subsequently offers employment to the TCN.[394]

Other examples entail 'open' frameworks, where industries develop their own qualifications and validation models to meet labour market needs. This is the example of Sweden, where since 2017, more than 35 000 qualification certificates have been issued for non-formal qualifications, of which more than 8 000 were issued in the most recent year.[395]

However, this employer-driven and largely decentralised approach presents several limitations, as highlighted by consulted stakeholders.[396] Beyond the absence of an established and standardised framework for skills assessment, resulting in a high degree of fragmentation, particular challenges arise from the reliance on agencies and intermediaries in third countries. While large companies may possess financial resources and organisational capacity to recruit directly abroad, small and medium-sized enterprises (SMEs) are generally required to rely on intermediaries.[397] This reliance increases recruitment costs for both employers and TCNs engaging in international mobility and may also create conditions conducive to irregular or unlawful recruitment practices. [398]

Annex 9.4 Conclusion

Overall, the evidence collected throughout the study indicates that the validation of skills for TCNs does not currently operate as a sufficiently visible, trusted or interoperable mechanism across Member States, particularly with regard to skills acquired outside the EU. Validation practices remain fragmented both across and within Member States[399] and are often implemented at the level of employers rather than through formal recognition authorities or established institutional frameworks.

As a result, **validation processes do not yet provide a consistent or reliable pathway for supporting recognition or facilitating labour market access**. Their effectiveness depends heavily on their linkage to formal credentials, their integration within NQF and their recognition by labour market actors, which often remains at the discretion of the employers. However, as seen above, awareness of available validation mechanisms remains limited,

[393] Focus Group on Attracting Talent and Recruitment with HR departments, EU associations of employers and Talent Partnerships stakeholders
[394] Targeted interview with two EU professional associations, three EU association of employers, two CSOs, three HR departments, two IOs; Focus group on attracting talent with HR departments and talent partnerships stakeholders (n= 27)
[395] Internal source provided by DG EMPL (Action 1)
[396] Targeted interview with one EU association of employers, two IOs, two HR departments
[397] Targeted interview with one EU association of employers, two IOs, two HR departments
[398] Targeted interview with one EU association of employers, two IOs
[399] Internal source provided by DG EMPL (Action 1)

procedures are frequently perceived as complex and time-consuming, and employers do not consistently rely on validation outcomes when assessing skills acquired abroad.

Taken together, these findings suggest that, in their current form, validation mechanisms are not sufficiently mature or widely embedded to support effective EU-level intervention. In the absence of a more coherent, trusted and operational baseline across Member States, EU action in this area would face significant feasibility and effectiveness constraints and may therefore not be justified at this stage.

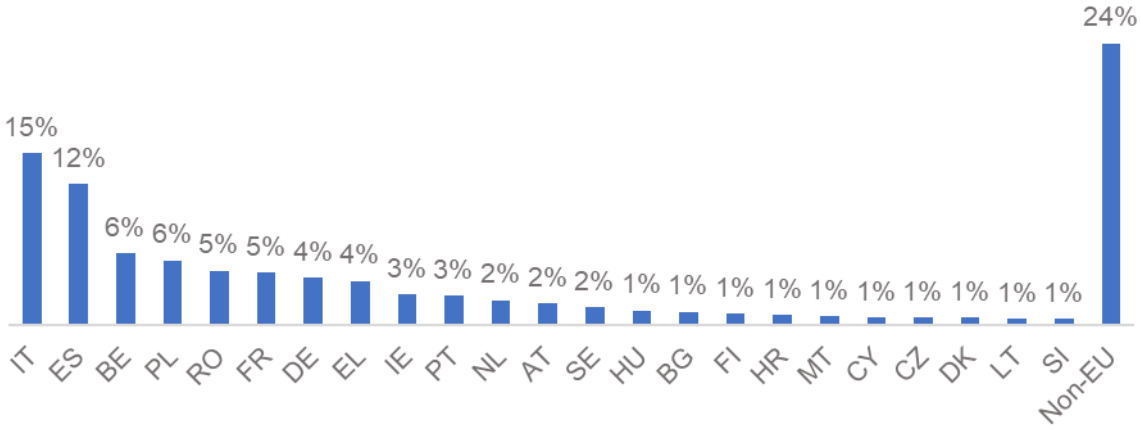
Annex 10. Analysis of public consultation

Annex 10.1 Introduction

The public consultation (PC) for the impact assessment of the SPI was open from 5 December 2025 to 27 February 2026, available in all EU official languages, and accessible via the Commission's "Have Your Say" portal. The questionnaire included both closed and open-ended questions addressing the contexts and issues underpinning each of the 3 actions included under the SPI. The consultation aimed to gather views from individuals and organisations on issues related to skills portability within the EU. The consultation explored challenges faced by individuals and employers when using qualifications and skills across borders, experiences with recognition procedures and the validation of skills, and obstacles and opportunities for mobility within the EU labour market. [400]

A total of **785 responses** were gathered. More than three-quarters of respondents (**76%**) were from **EU Member States**, while the remaining **24%** represented **non-EU countries**[401]. The EU Member States with the highest numbers of respondents included Italy (15%), Spain (12%), Belgium (6%), and Poland (6%). (see Figure 35).

Figure 35 – Respondents by country of origin (N= 785)



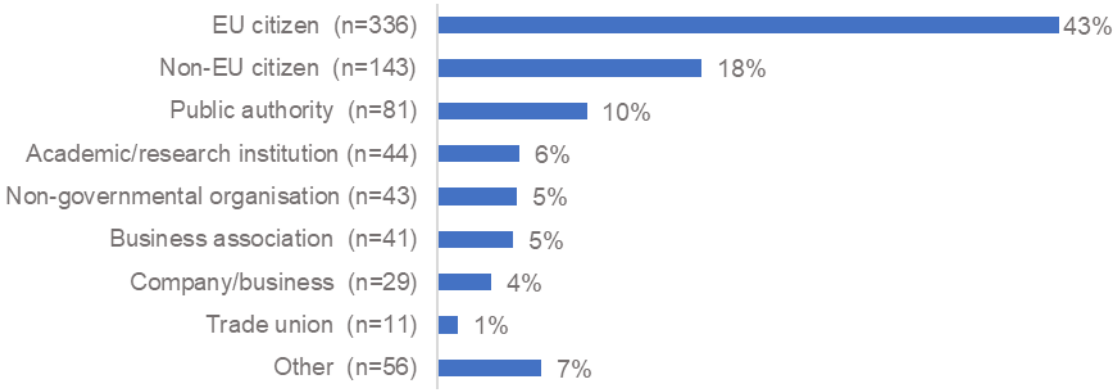
On the total number of respondents, the large majority (61%) is represented by **individual respondents**, including both **EU (43%)** and **non-EU citizens (18%)**. **Organisations** accounted for **39%** of responses, encompassing **public authorities (10%), academic or research institutions (6%), NGOs (5%) business associations (5%), businesses (4%)** and **trade unions (1%)**. Other respondents (e.g. National boards and professional

[400] European Commission. Skills portability, action 3 – simplifying the recognition of qualifications and skills of third-country nationals. Available at: Skills portability, action 3 – simplifying the recognition of qualifications and skills of third-country nationals

[401] Respondents from non-EU countries were from: Albania, Algeria, Angola, Argentina, Australia, Azerbaijan, Bangladesh, Benin, Bosnia and Herzegovina, Brazil, Cameroon, Canada, Chile, Cuba, Ecuador, Egypt, Ethiopia, Georgia, Ghana, Iceland, India, Indonesia, Iran, Iraq, Jordan, Kenya, Libya, Malaysia, Moldova, Morocco, Nepal, Nigeria, North Macedonia, Pakistan, Philippines, Russia, Serbia, South Africa, South Sudan, Sri Lanka, Sudan, Tajikistan, Tanzania, Tunisia, Türkiye, Uganda, Ukraine, United Kingdom, and the United States.

associations, national ministries, CEDEFOP, ETF and ENIC NARIC centres) professional bodies, chambers and regulators; intermediaries and other civil society actors, EU agencies) accounted for 7% of responses (see Figure 36).

Figure 36 – Respondents by stakeholder group



This annex provides an overview of the responses to the PC on key questions relevant for **Action 3 of the Skills Portability Initiative (SPI)**, specifically the study on common EU rules for the recognition of qualifications and validation of skills of TCNs.

The **sample considered** in the following analysis only encompasses **individual TCNs, EU-citizens with a TCQ** as well as a broad range of stakeholders involved in recognition, labour market integration and migration, including **employers, business associations, CSOs, trade unions, academic and research institutions, and public authorities**. EU citizens with EU qualifications were excluded from the analysis, as their feedback is not relevant for the specific objectives and findings of Action 3. In total, 486 responses were retained for analysis (n=486).

Where relevant, the analysis draws on **targeted sub-samples** to provide a more in-depth and punctual assessment of stakeholder perspectives. In some analytical sections, the focus is placed exclusively on individual TCNs (n=61) or EU-citizens with a TCQ (n=37) while in others it is limited to a sub-group of stakeholders directly engaged in the recruitment, recognition, and support of TCNs. This approach allows findings to be contextualised according to the actors most directly concerned, while preserving the robustness and relevance of the overall analysis.

In terms of content, the following sections summarise the **main problems and challenges** encountered by TCNs in the recognition of their qualifications and validation of their skills when coming to the EU, outline the **EU tools currently in place**, and present stakeholders' **perceptions regarding the need for EU action**, as well as their views on potential **EU-level solutions**.

Annex 10.2 An overview on the practices for recognition of qualifications and validation of skills

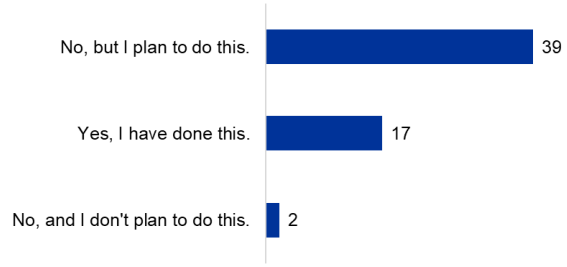
Annex 10.2.1 The recognition of TCQs in the EU

Among TCNs who responded to the PC, 17 out of 61 have tried to get their qualifications recognised in an EU Member State (all of whom are currently based in the EU), and 39 out of 61 are planning to apply for recognition. Only a small minority of TCNs (i.e. 2 out of 61) who responded to the PC, have not sought for recognition and do not have the intention to (see

Figure 37).[402]

For what concerns **EU citizens with TCQs**, a 28 out of 38 respondents either already has their qualifications recognised (i.e. 14 respondents) or aims to do so (i.e. 14 respondents), while a nine out of 38 respondents has not had their qualifications recognised, nor intends to do so in the future.

Figure 37 - Have you ever tried to get your qualification(s) recognised in an EU country? (TCNs, n=61)



Source: Author's own elaboration based on the PC

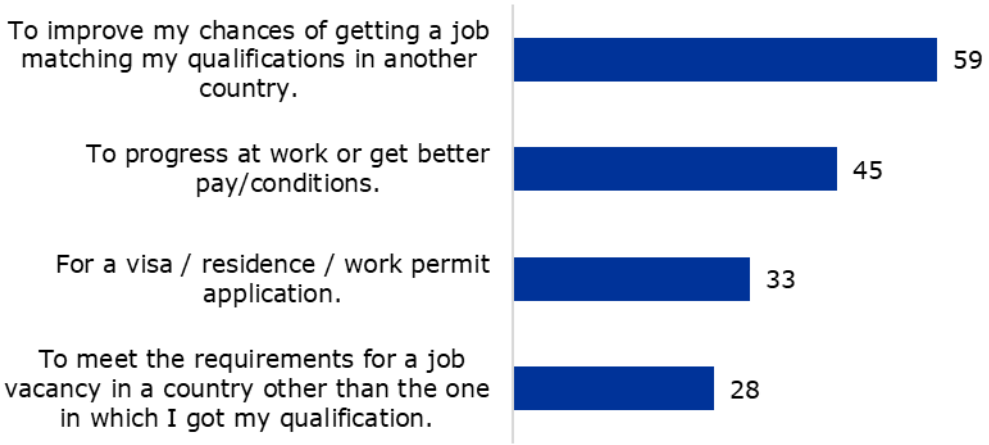
Figure 38 - Have you ever tried to get your qualification(s) recognised in an EU country? (EU citizens with TCQs, n=38)



Source: Author's own elaboration based on the PC

As shown in the figure below, TCNs and EU citizens with TCQs (n=17 TCNs, and n=14 EU citizens) who underwent or plan to undergo (n=39 TCNs and n=14 EU citizens) recognition processes were mostly motivated by the **possibility to improve their chances of getting a job matching their qualification level** (59 out of 84), or to **progress at work** or get better pay and conditions (45 out of 84). For a minority of respondents entirely composed of TCNs (33 out of 84) the need to apply for a visa, residence or work permit also played a role in their decision to apply for recognition. Conversely, only 28 out of 84 of respondents sought recognition of their qualifications to **meet the requirements for a job vacancy in a Member State** (see Figure 39).

Figure 39 - What motivated you to have your qualifications recognised? (select all that apply) (n=84)

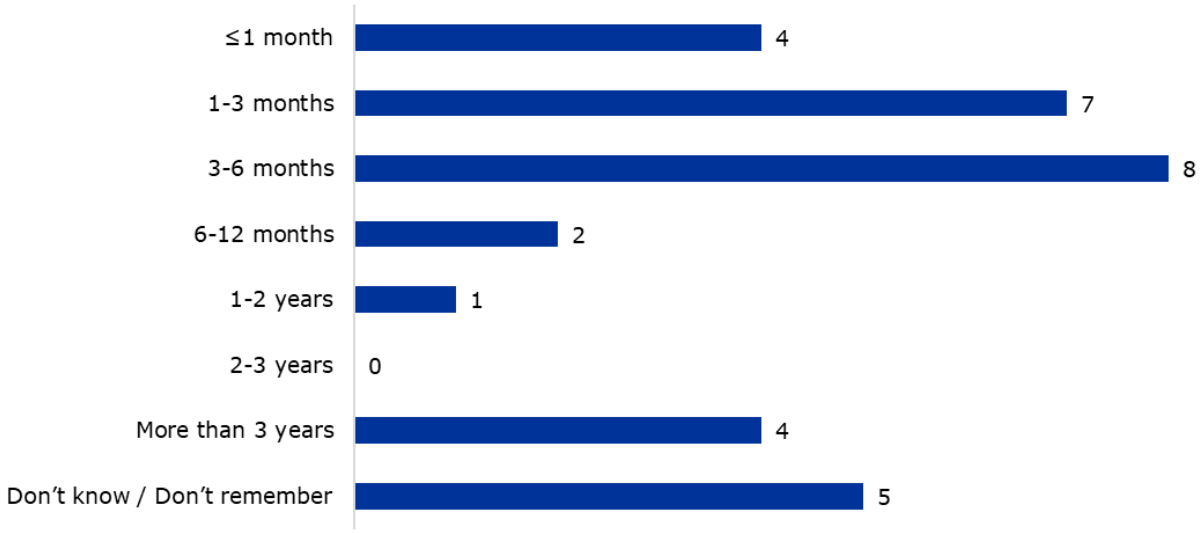


[402] PC. Q32 "Have you ever tried to get your qualification(s) recognised in an EU country?" (n=61)

Source: Author's own elaboration based on the PC

The length of the recognition procedures for a majority of TCNs and EU citizens with TCQs (19 out of 31) lies within a maximum of six months or below as it can be seen from Figure 40 below, with a minority (seven out of 31) taking between 6 months and three years. Results from the PC do not highlight particular differences between EU citizens and TCNs with TCQs.

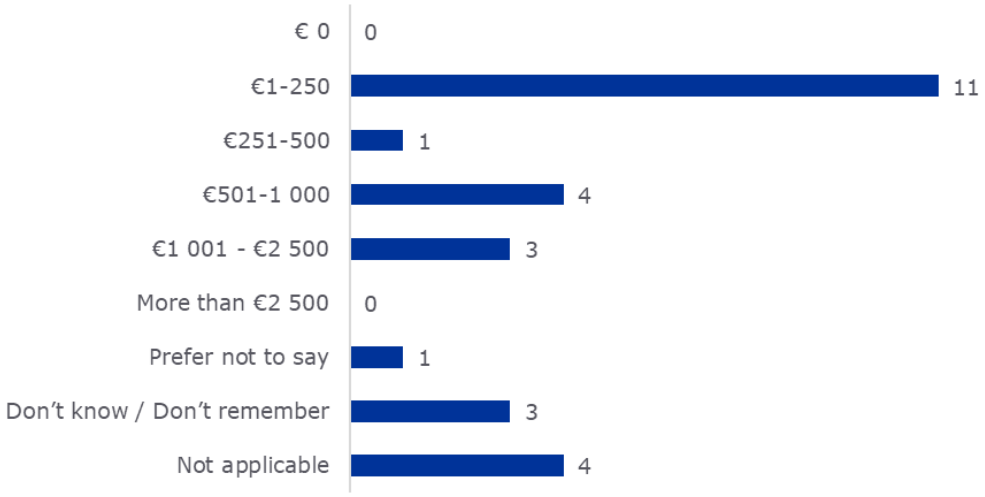
Figure 40 - How long did the recognition process take from start (gathering all necessary documents) to finish (receiving a decision or final outcome)? (n=31)



Source: Author's own elaboration based on the PC

A certain degree of variance was also observed with respect to costs borne for the whole recognition process, including those for certified translations, certifications needed and application per se, with 11 out of 31 respondents mentioning costs between EUR 1 and EUR 250, while 4 out of 31 respondents experience costs ranging between EUR 501 and EUR 1000 (see Figure 41 below), with no substantial difference between TCNs and EU citizens.

Figure 41 - Approximately how much did the recognition process cost you overall (please estimate all fees and costs paid, including for translations, certifications and the application)? (n=31)



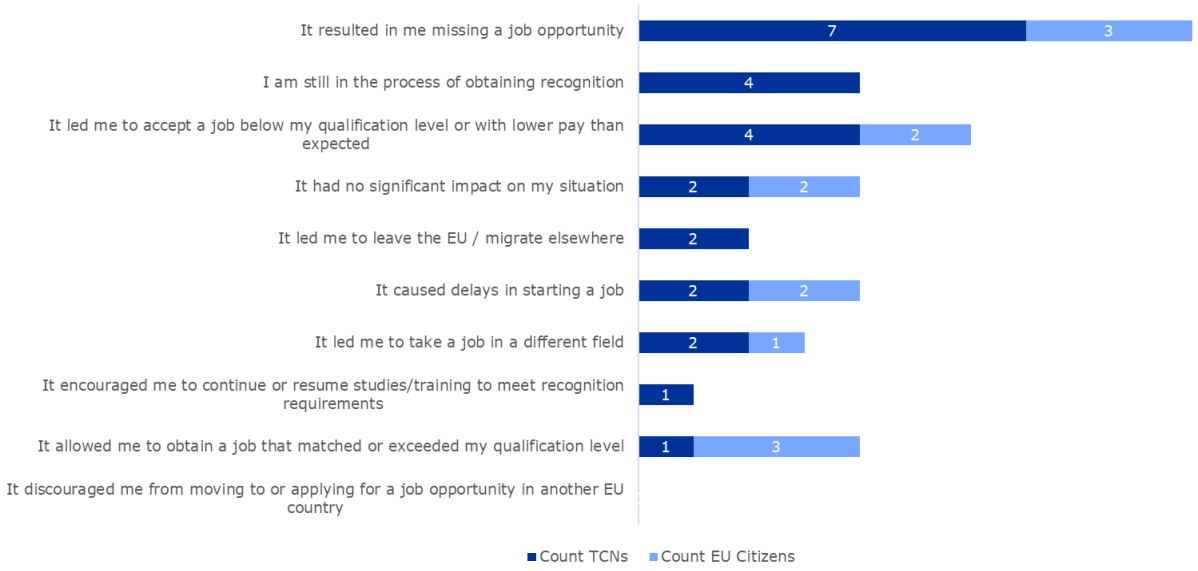
Source: Author's own elaboration based on the PC

The vast majority of respondents reported negative impacts of the process or outcome of a recognition decision. In particular, 10 respondents out of 31 (n=7 TCNs and n=3 EU citizens) indicated that the **lack of recognition resulted in a missed job opportunity**, while six respondents out of 31 (n=4 TCNs and n=2 EU citizens) reported that they **had to accept a job below their qualification level or expected pay** and 4 respodnets out of 31 (n=2 TCNs and n=2 EU citizens) indicated **delays in starting a job**. In addition, four respondents (n=4 TCNs) are **still in the process of obtaining recognition,** two (n=2 TCNs) stated that recognition **issues led them to leave the EU**, or pushed them to **take up employment in a different field** (n=2 TCNs and n=1 EU citizens).[403] Illustrative cases include a woman working as a cleaner in the EU despite having previously worked as a project leader and manager in Albania, and an individual holding a Master's degree who is currently employed as a Pilates teacher following an unsuccessful recognition process.[404]

[403] PC results. Q40 "How did the process or outcome of the recognition decision affect you? (Select all that apply) (n=31)
[404] PC results. Q41 "Do you want to add anything about the qualification recognition process? If so, please write it below.(n=17)

Conversely, only one respondent reported positive outcomes, such as pursuing further studies or obtaining a job matching or exceeding their qualification level.[405]

Figure 42 - How did the process or outcome of the recognition decision affect you? (Select all that apply) (n=31)



Source: Author's own elaboration based on the PC

Annex 10.2.2 Validation of skills for TCNs in the EU

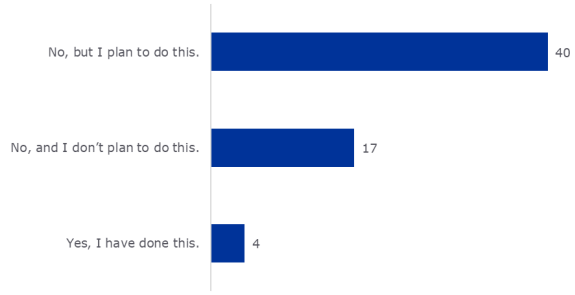
In contrast to recognition procedures, only a minority of TCNs (n=4) and of EU citizens (n=2) reported having already validated their skills. An **overwhelming majority of TCNs 57 out of 61 respondents) and of EU citizens with TCQs (35 out of 37 respondents) had not pursued skills validation,** although 40 TCNs and 17 EU citizens indicated that they plan to do so, while 17 TCNs out of 61 responding and 18 EU citizens with TCQs out of 37 reported having no intention to pursue validation (see Figure 43).[406]

Among this latter group of TCNs and EU citizens with TCQs who do not plan to validate their skills at a formal level (n = 35), the **main barrier appears to be a lack of awareness**. In particular, 23 respondents stated that they had never heard of the possibility to validate their skills, while 10 respondents who were aware of this possibility reported that they did not know how to proceed or which institutions to contact.[407]

This finding further corroborates the evidence presented in below, which highlights that recognition systems for TCNs remain strongly centred on formal qualifications, while **skills acquired through non-formal and informal learning, including work experience, continue to be insufficiently recognised or validated.**

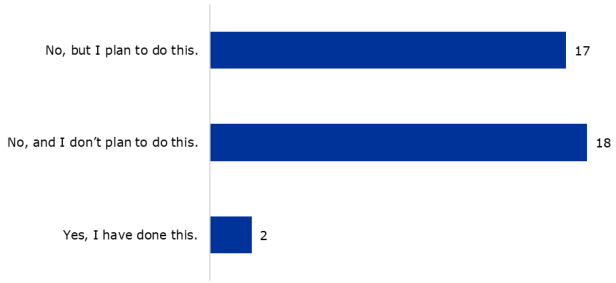
[405] PC results. How did the process or outcome of the recognition decision affect you? (Select all that apply) (n=17)
[406] PC results. Q42 "Have you ever had your skills (e.g. from work experience or volunteering) officially validated in an EU country (i.e. have you requested and received a certificate or qualification from an official authority proving what you can do)?" (n=61 TCNs) (n=37 EU citizens with TCQs)
[407] PC results. Q43 "Are you aware that in some places it is possible to obtain an official certificate to show potential employers what you can do and what you have learnt outside of formal education (for example, while working or while volunteering)?" (n=17)

Figure 43 - Have you ever had your skills (e.g. from work experience or volunteering) officially validated in an EU country (i.e. have you requested and received a certificate or qualification from an official authority proving what you can do)? (n=61 TCNs)



Source: Author's own elaboration based on the PC

Figure 44 - Have you ever had your skills (e.g. from work experience or volunteering) officially validated in an EU country (i.e. have you requested and received a certificate or qualification from an official authority proving what you can do)? (n=28 EU citizens with TCQs)



Source: Author's own elaboration based on the PC

The main reasons reported by TCNs and EU citizens with TCQs for validating their skills (considering responses from those who have already completed the validation process or are planning to do so) primarily relate to **improving their chances of securing employment** (51 respondents out of 61), **supporting career progression and improving working conditions and pay** (49 respondents out of 61), and providing employers with **formal evidence of their skills** (47 respondents out of 61) (see Figure 45).[408]

Figure 45 - What motivated you to have your skills validated? (Select all that apply) (n=63)



Source: Author's own elaboration based on the PC

With regard to the length of validation procedures, only TCNs who underwent the skills validation procedures provided insights. The findings show some degree of variety, with three respondents indicating the duration of the validation process from start to finish lasting less than a month, one respondent indicating between one and three months and another

[408] PC results. Q45 "What motivated you to have your skills validated? (Select all that apply)" (n=63)

one indicating three and six months,[409] while in terms of costs three TCNs indicated that the process was free of charge.[410] In terms of outcome of the validation decisions, some TCNs mentioned that validation procedure ended up leading to missing a job opportunity (2), discouraged them from moving to or applying for a job in another EU Member State (2), caused delays in getting a job (1), or had no significant impact (3).[411]

Overall, validation of skills is mostly performed by employers, and the next section provides a brief overview on the validation practices they carry out.

Annex 10.2.2.1 The validation of skills performed by employers

In terms of employer practices for assessing qualifications and validating skills when recruiting TCNs and evaluating TCQs, the evidence points to a **high degree of heterogeneity**, suggesting the **absence of well-established or standardised procedures among employers**. This lack of consistency is particularly pronounced with regard to the validation of skills and **non-formal and informal learning** that is not certified by an official authority.

When identifying the skills and qualifications of TCNs, **the majority of employers who have engaged in the recruitment process of TCNs** (**75%, 15 respondents**) reported that they request candidates to provide proof of their qualifications. This is followed by requesting credential issued by official authority that has assessed and certified candidates' skills (13 respondents) (see Figure 46).[412]

In addition, many employers reported using **their own assessment methods** to evaluate candidates' skills. These include assessments conducted through interviews (**nine** respondents) as well as **competency based- interviews, tests, and assessment centres** (**eight** respondents), highlighting the importance of informal and employer -led evaluation practices in the recruitment process.[413] At the same time, another substantial share of respondents (**eight** respondents) indicated that they rely on **applicants' self-declared- skills and qualifications,** as presented in curricula vitae and cover letters, particularly when assessing candidates from unfamiliar education systems or labour markets.[414]

Moreover, while 45% (nine respondents) of employers require candidates to obtain a **formal recognition decision or a statement of comparability**, a smaller share (**3 respondents**) indicated that they require candidates to have their skills **formally validated by a CA**.[415]

Overall, levels of **trust in micro credentials remains relatively low**. Only **three** respondents reported accepting micro credentials as such, although this share increases to **seven respondents** when employers can identify the training provider, learning outcomes,

[409] PC results. Q49. "How long did the validation process take from start (gathering all necessary documents) to finish (receiving a decision or final outcome)" (n=4)
[410] PC results. Q50. "Approximately how much did the validation process cost you overall (please estimate all fees and costs paid, including for translations, certifications and the application)?" (n=4)
[411] PC results. Q51. "How did the process or outcome of the validation decision affect you? (Select all that apply)" (n=4)
[412] PC results. Q53. "When recruiting candidates from other countries, what sources of information do you use to identify their skills and qualifications, and do you trust these sources?" (Select all that apply)" (n=20)
[413] PC results. Q53. "When recruiting candidates from other countries, what sources of information do you use to identify their skills and qualifications, and do you trust these sources?" (Select all that apply)" (n=20)
[414] PC results. Q53. "When recruiting candidates from other countries, what sources of information do you use to identify their skills and qualifications, and do you trust these sources?" (Select all that apply)" (n=20)
[415] PC results. Q53. "When recruiting candidates from other countries, what sources of information do you use to identify their skills and qualifications, and do you trust these sources?" (Select all that apply)" (n=20)

and QA arrangements. Taken together, these findings suggest that employer trust remains strongly anchored in traditional qualifications and self-assessment mechanisms, while skills validation processes, particularly those linked to non-formal and informal learning, are still only marginally integrated into recruitment practices.[416]

Figure 46 - When recruiting candidates from other countries, what sources of information do you use to identify their skills and qualifications, and do you trust these sources? (select all that apply) (n=20)



Source: Author's own elaboration based on the PC

Regarding the main reasons for which employers tend to require a formal recognition of qualifications, half of the respondents (10 out of 20) indicated that this requirement is primarily driven by external obligations, rather than their own preferences. In particular, 5 respondents reported that recognition is necessary to comply with requirements set by others, such as those linked to public tenders or subsidised contracts, while other 5 respondents indicated that formal recognition is used as a means to verify the authenticity of qualifications (see Figure 47).

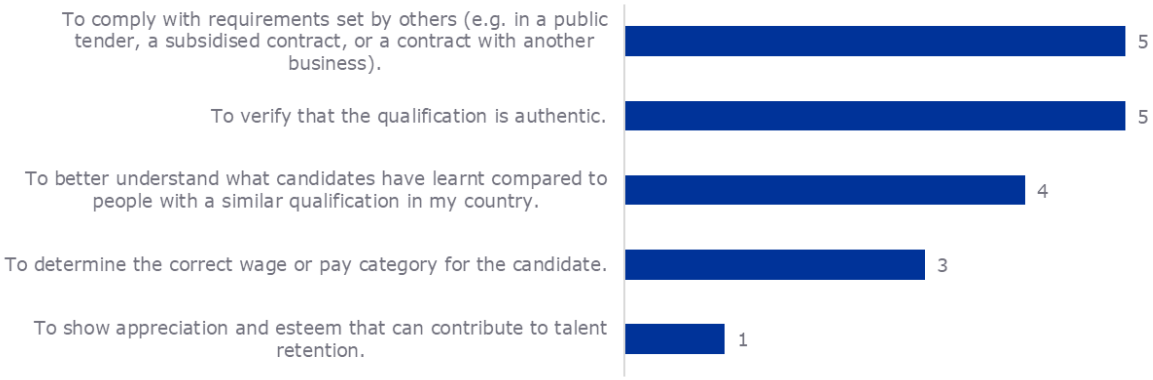
Beyond compliance-related motivations, employers also reported using formal recognition to support their own assessment processes. Specifically, four respondents indicated that recognition helps them gain a better understanding of the content and level of learning

[416] PC results. Q53. "When recruiting candidates from other countries, what sources of information do you use to identify their skills and qualifications, and do you trust these sources?" (Select all that apply)" (n=20)

acquired by applicants, while three reported relying on recognition outcomes to determine the appropriate wage level.

Overall, these findings suggest that employers' use of formal recognition serves both procedural purposes - linked to regulatory or contractual requirements - and informational purposes, supporting decisions related to recruitment, job matching, and remuneration.

Figure 47 - Why do you ask candidates to get their foreign qualifications recognised by a competent authority in your country? (Select all that apply) (n=20)



Source: Author's own elaboration based on the PC

Moreover, the call for evidence further corroborates the fact that **employers often rely on assessment and trust mechanisms that differ fundamentally from formal recognition procedures**, particularly when recruiting TCNs, unless forced by external factors. While public recognition systems prioritise formal documentation, academic curriculum equivalence and administrative completeness, employers, especially in shortage sectors, tend to assess candidates through **competence-based, multi-stage and practice-oriented processes**.[417] This misalignment is repeatedly identified as a source of inefficiency and missed opportunities for skills utilisation.

Concrete employer evidence illustrates this gap. Some employers use a structured, multi-stage assessment process to recruit skilled workers from third countries, combining video interviews, technical discussions, demonstrations of practical tasks, review of work history and supporting documentation.[418] While these assessments provide a robust picture of what candidates can do in real occupational settings, they are often **not considered by recognition authorities**, whose decisions remain anchored in formal curricula and documentation rather than demonstrated competence. This creates a practical mismatch between recognition logic and occupational reality, particularly in sectors where skills are standardised through work processes rather than educational pathways.

Similarly, SMEs emphasise that the complexity of existing frameworks makes it difficult to translate recognition outcomes into operational hiring decisions. SMEs need **simple, usable decision-support tools** rather than abstract classifications.[419] They propose the

[417] Contribution to the call for evidence (DKG; CONFLAVORO; Taflan GmbH; PMI).
[418] Contribution to the call for evidence (Taflan GmbH).
[419] Contribution to the call for evidence (CONFLAVORO).

development of an “SME Skills Snapshot” embedded in a digital wallet concept, which would summarise verified competences in a format aligned with production realities and SME capacity.[420] The emphasis is not on replacing public recognition, but on making outcomes intelligible and actionable for employers with limited administrative resources.

Lastly, healthcare employers note that recognition decisions are frequently framed in **deficit-based terms**, focusing on missing elements or gaps relative to national curricula, without clearly indicating what applicants are already qualified to do.[421] Hospitals argue that more **positive, competence-visible outcomes**, for example, clearly identifying tasks that can be performed under supervision or during adaptation periods, would allow employers to deploy skills earlier and more effectively during integration, especially in contexts of acute staff shortages.[422]

10.2.2.2 Support provided by employers to TCNs

In cases where a recognition procedure is mandatory in order to access a profession or obtain a work permit in a Member State, most employers indicated that they provide support to the employee, who nonetheless remains formally responsible for completing the procedure. In particular, six out of nine respondents reported that they assist candidates throughout the process, for example by offering guidance or administrative support. By contrast, two employers indicated that they handle the recognition procedure directly on behalf of the applicant. One respondent further clarified that the level of employer involvement depends on the type of position being filled, with greater support typically provided for certain roles.[423]

From the perspectives of business organisations, CSOs and academic authorities, evidence on the length of recognition procedures points to a wide variation in duration, broadly consistent with TCNs’ perceptions. Reported timelines range from less than one month (two respondents) to two to three years (one respondent), as illustrated in Figure 48.

With regard to costs borne by employers, four respondents out of nine reported costs in the range of EUR 251 to EUR 500. The remaining respondents provided a variety of estimates, reflecting considerable differences across Member States. In addition, two respondnets out of nine respondents indicated that costs are not applicable, suggesting that in some cases employers do not directly incur expenses related to recognition procedures or that such costs are borne by other actors (see Figure 49).

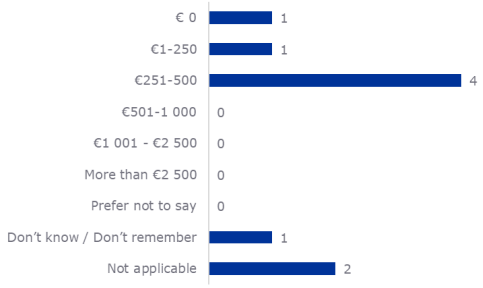
[420] Contribution to the call for evidence (CONFLAVORO).
[421] Contribution to the call for evidence (DKG).
[422] Contribution to the call for evidence (DKG).
[423] PC results. Q56. “If a recognition procedure is mandatory to access a specific profession or to stay/work in the country, do you, as an employer, handle the procedure, or do you leave it to the prospective employee?” (n=9)

Figure 48 - How long do formal recognition processes usually take from start (filing the application) to finish (receiving a decision)? (n=9)



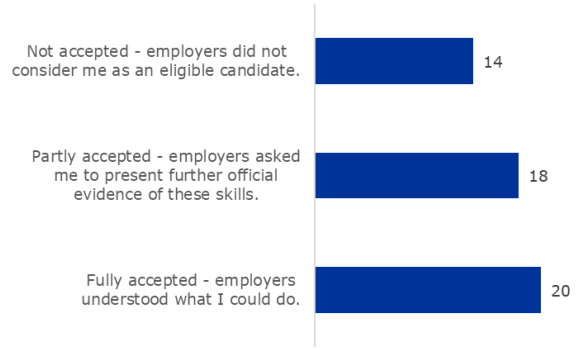
Source: Author's own elaboration based on the PC

Figure 49 - Approximately how much did the validation process cost you overall (please estimate all fees and costs paid, including for translations, certifications and the application)? (n=9)



Source: Author's own elaboration based on the PC

Figure 50 - To what extent were the skills that you acquired in a different country accepted by employers (your previous work or volunteering experience, for example)? (n=51)



Source: Author's own elaboration based on the PC

Figure 51 - How did this affect how well your job matched your level of skills (what you can do based, for example, on your previous work experience)? (n=51)



Source: Author's own elaboration based on the PC

IOs also stress that existing recognition pathways focus primarily on formal diplomas and certificates, while **systematic assessment of skills acquired through work experience or informal learning is uneven or absent** across Member States.[424] Where documentation is missing or incomplete (e.g. as it is often the case for the most disadvantaged groups including refugees and undocumented migrants), recognition procedures often stall rather than offering structured alternative pathways. Therefore IOs call for the integration of **recognition of prior learning (RPL)** as a core component of recognition systems, including clear, structured routes for validating competences where formal evidence cannot be provided.[425] This would particularly benefit refugees and TCNs who acquire substantial skills through **real work environments**, including through work integration social enterprises (WISEs), that remain largely invisible in current recognition and validation systems.[426] In addition, one IO argues that WISEs should be explicitly acknowledged as legitimate environments for skills acquisition and that validation mechanisms should be adapted to capture learning outcomes from work-based and informal contexts, particularly when formal documentation is unavailable.[427]

Trade unions frame the lack of effective validation of non-formal and informal skills as both a labour market and a social issue, emphasising that when skills acquired through experience are not recognised, TCNs are systematically exposed to **deskilling and downward occupational mobility**, even when they possess relevant competences.[428] Prolonged non-recognition increases dependency on employers or intermediaries and heightens vulnerability to exploitation, underscoring that access to validation is also a matter of equal treatment and worker protection.[429]

Employers, particularly SMEs, confirm that this misalignment between recognition systems and labour market realities undermines efficient recruitment.[430] In many sectors, especially craft, services and production-oriented occupations, **practical experience is often more relevant than formal diplomas**. However, **employers have limited tools to rely on such experience** when recognition systems do not provide credible and trusted validation mechanisms. As a result, employers may be unable to mobilise available skills or may abandon recruitment of TCNs despite clear operational needs.[431]

Overall, stakeholders argue that the gaps in validation mechanisms reflect a **weak operationalisation, rather than** a lack of policy intent. In fact, while EU frameworks and instruments acknowledge non-formal and informal learning in principle, stakeholders argue that these remain insufficiently embedded in recognition procedures for TCQs. Validation pathways are often optional, fragmented or project-based, rather than integrated into mainstream recognition processes.[432]

[424] Contribution to the call for evidence (IOM; ENSIE).
[425] Contribution to the call for evidence (IOM).
[426] Contribution to the call for evidence (ENSIE).
[427] Contribution to the call for evidence (ENSIE).
[428] Contribution to the call for evidence (ETUC).
[429] Contribution to the call for evidence (ETUC, IOM).
[430] Contribution to the call for evidence (CONFLAVORO; Taflan GmbH).
[431] Contribution to the call for evidence (CONFLAVORO; Taflan GmbH).
[432] Contribution to the call for evidence (ETUC, IOM).

At the same time, stakeholders emphasise that effective validation of non-formal and informal skills requires **credibility, transparency and trust**. In fact, validation mechanisms should involve social partners and reflect **production realities**, so that assessed competences are meaningful for hiring decisions and outcomes must be portable, transparent and subject to quality assurance.[433]

Another substantial issue concurring to the limited ability to validate skills stands in the language barriers. **Around 60% of respondents** identify language barriers as a key factor affecting the recognition and valuation of TCQs. This issue is particularly emphasised by **TCNs (around 70%)** and **CSOs (around 65%)**, who report difficulties understanding procedures, accessing information and demonstrating competence. **Around 45% of public authorities** also acknowledge that language requirements can hinder fair access to recognition processes.[434]

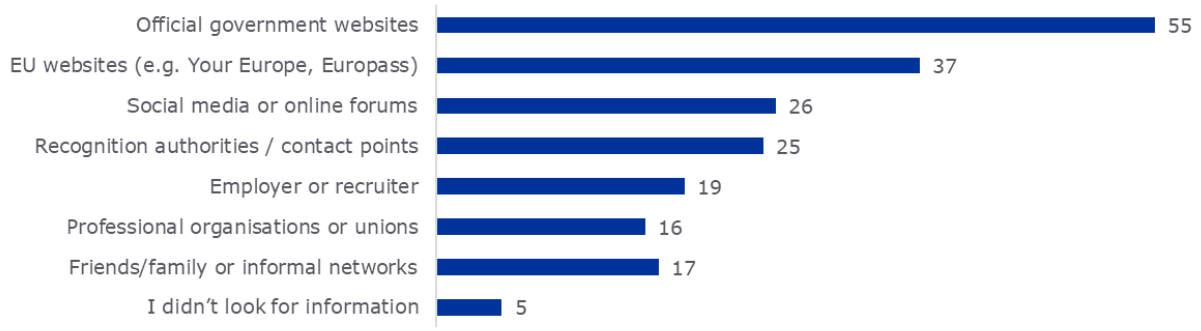
Annex 10.2.3 Lack of clear and accessible information

In terms of information accessibility regarding procedures for the recognition of qualifications and the validation of skills, TCNs express broadly aligned views regarding the accessibility of information on procedures for both the recognition of qualifications and the validation of skills. However, the perceived quality and accessibility of information are higher for the recognition of qualifications than for the validation of skills. This difference is to be expected, given the more limited scope for validating skills through standardised and formalised procedures compared to qualification recognition.

The majority of individuals with TCQs who have already **recognised** their qualifications or are planning to do so, **sought information from official government websites** (55 out of 84 respondents), followed by **EU websites**, such as “Your Europe” or “Europass” (37 out of 84 respondents). A minority also mentioned online fora and social media (26 out of 84 respondents), recognition authorities and contact points (29,8%) and employers or recruiters (19 out of 84 respondents) as relevant a source of information (see figure below). Only a few TCNs indicated other sources, including universities, mobility partnerships websites and AI-powered chatbots.[435]

[433] Contribution to the call for evidence (ETUC, CONFLAVORO).
[434] PC results. Q25 “Do you think there are other issues that make it harder for people to have their skills and qualifications understood, recognised and valued in another country?” (n=486)
[435] PC results. Q35 “Where did you look for information about the recognition of qualifications? (Select all that apply) (n= 84)

Figure 52 - Where did you look for information about the recognition of qualifications? (Select all that apply) (n= 84)



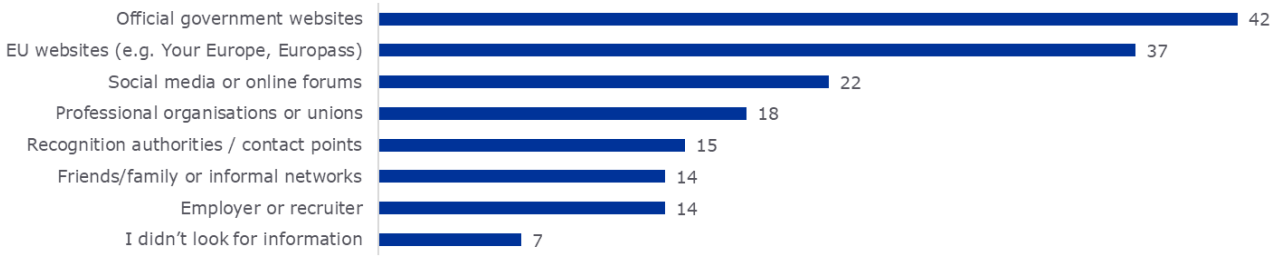
Source: Author's own elaboration based on the PC

With regard to the **quality of such information**, half of the respondents (61 respondents out of 84) considered it **somewhat clear**, while only 17 respondents out of 84 found it not clear at all, and none of the respondents was unable to retrieve it.[436]

Conversely, **slightly less than half of respondents with TCQs highlighted that no support or assistance was available during the recognition process** (14 respondents out of 31) and even in cases where it was available, it was largely unhelpful (8 respondents out of 31). Only 5 respondents out of 31 considered assistance helpful.[437]

In line with findings on recognition procedures, the main sources of information used by TCNs who have **validated** their skills or are planning to do so are **official national government websites** (42 respondents out of 63) and **EU-level platforms**, such as "Your Europe" or "Europass" (37 respondents out of 63). A smaller share of respondents also reported relying on **online fora and social media** (22 respondents out of 63), **professional organisations or trade unions** (18 respondents out of 63), **recognition authorities and contact points** (15 respondents out of 63) and **informal networks**, including family and friends (14 respondents out of 63), as relevant sources of information (see Figure 53). Only one respondent reported having used an AI-powered chatbot to obtain information on skills validation.[438]

Figure 53 - Where did you look for information about how to do this? (Select all that apply) (n=63)



Source: Author's own elaboration based on the PC

[436] PC results. Q36 "How clear was the information you found about the requirements for recognition?" (n=84)
[437] PC results. Q37 " Was support or assistance available during the recognition process? "(n=31)
[438] PC results. Q46. "Where did you look for information about how to do this? (Select all that apply) (n=63)

With regard to the clarity of the information available, the findings suggest that access to information does not necessarily translate into effective understanding. Among respondents with TCQs who actively searched for information on skills validation, a significant majority (42 respondents out of 63) found the **information retrieved to be either only somewhat clear** (19 respondents out of 63) or **not clear at all** (23 respondents out of 63), indicating considerable difficulties in navigating or interpreting validation-related guidance. In addition, 11,1% of respondents reported being **unable to retrieve any information**, pointing to persistent gaps in visibility or accessibility despite the existence of multiple information sources. Conversely, only a minority of respondents (15 respondents out of 63) assessed the information retrieved as very clear.[439] In terms of support provided during the skills validation process, only individuals who underwent the formal process provided insights (n=6), with three respondents indicating that support was either not available, or not helpful, while only one found it useful.[440]

Overall, these findings indicate that while information on skills validation is formally available - primarily through official channels - its clarity and user-friendliness remain uneven, potentially acting as a barrier to engagement with validation procedures and contributing to lower uptake among TCNs.

Employers' perspective proved to be more critical on the information provision. Employers evidence consistently identifies **limited transparency of recognition procedures** and **weak practical comparability of TCQs** as a major impediment to effective recognition of TCNs skills and qualifications. This limitation is not primarily linked to the quality of third-country education and training, but to the absence of accessible, standardised and trusted information allowing authorities and employers to interpret non-EU qualifications in a consistent and operational manner.[441]

Annex 10.2.4 Complex and burdensome administrative procedures for recognition

Several TCNs highlight how fragmentation, together with the **complexity** of current recognition and validation procedures, causes **excessive length** and **uncertainty of recognition and comparability procedures**. 16 TCNs out of 98 respondents highlighted **burdensome, costly and repetitive documentation requirements**.[442] In particular, respondents referred to the high costs of certified translations, legalisation and apostilles, repeated requests for original curricula or legacy documents, and the rejection of work experience as valid evidence. Several respondents with TCQs stressed that documentation requirements created a financial barrier before they could even begin their professional trajectory in the EU, disproportionately affecting those with long careers or education completed outside formal EU systems.[443] Moreover, 14 respondents with TCQs out of a total

[439] PC results. Q47. "How clear was the information you found about the requirements for getting your skills validated?" (n=63)
[440] PC results. Q48. "Was support or assistance available during the process?" (n=6)
[441] Contribution to the call for evidence (Taflan GmbH; ZDH; ONCD).
[442] PC results. Q26 "Have you had any personal experiences with any of these challenges, for example, when applying for jobs in a different country, recruiting people from another country or dealing with the recognition of qualifications or validation of skills?" (n=98) open question
[443] PC results. Q27 "please elaborate on any personal experiences with any of these challenges" (n=98), open question

of 98 respondents explicitly referred to the **excessive length and uncertainty of recognition or comparability procedures**.[444] Some testimonies linked long procedures to forced professional inactivity, delayed careers, and prolonged dependency on precarious employment. In several cases, respondents noted that they would need to repeat the same lengthy procedure if applying in another Member State.[445]

Nonetheless, some stakeholders caution that simplification should not be equated with speed alone, as equivalence assessments require substantive technical judgment that shall be performed at national level.[446] Some stakeholders therefore see EU added value primarily in procedural convergence, clear sequencing, reusable outcomes and timelines, without harmonising standards.[447]

Annex 10.2.5 Lack of understanding and trust of qualifications and skills obtained in third countries

Stakeholder evidence consistently identifies **limited transparency** and **weak practical comparability of TCQs** as a major impediment to the effective understanding and consequent recognition of TCNs skills and qualifications. This limitation is not primarily linked to the quality of third-country education and training, but to the absence of accessible, standardised and trusted information allowing authorities and employers to interpret non-EU qualifications in a consistent and operational manner.[448]

Approximately 50% of respondents to the PC (n=486) mention limited transparency and comparability of non-EU qualifications as a significant challenge.[449] This concern is raised by **around 55% of public authorities**, which report difficulties mapping TCQs to national or European frameworks. **Around 45% of respondents with TCQs and businesses** also highlight employers' limited ability to interpret foreign qualification titles and levels. **Around 40% of CSOs** underline that existing EU transparency tools are poorly known or inconsistently applied to non-EU qualifications.[450]

Moreover, employers and competent authorities report **persistent difficulties in accessing reliable information on curricula, training content, learning outcomes and awarding bodies for TCQs**. Where such information exists, it is often fragmented, non-digitised or not available in a format usable for recognition procedures, forcing authorities to rely on ad hoc document requests and individualised assessments).[451] As a result, recognition decisions are frequently made under conditions of informational uncertainty, increasing both processing times and the risk of divergent outcomes.

[444] PC results. Q26 "Have you had any personal experiences with any of these challenges, for example, when applying for jobs in a different country, recruiting people from another country or dealing with the recognition of qualifications or validation of skills?" (n=98), open question
[445] PC results. Q27 "please elaborate on any personal experiences with any of these challenges" (n=98) open question
[446] Contribution to the call for evidence (COLEF).
[447] Contribution to the call for evidence (IOM; Confederation of Danish Employers).
[448] Contribution to the call for evidence (Taflan GmbH; ZDH; ONCD).
[449] PC. Q25 "Do you think there are other issues that make it harder for people to have their skills and qualifications understood, recognised and valued in another country?" (n=486)
[450] PC results. Q25 "Do you think there are other issues that make it harder for people to have their skills and qualifications understood, recognised and valued in another country?" (n=486)
[451] Contribution to the call for evidence (Taflan GmbH; ZDH).

Beyond gaps in understanding TCQs, 38% of consulted stakeholders highlight a **lack of trust in TCQ systems.**[452] This perception is most prevalent among **TCNs (around 55%)**, who frequently describe systemic scepticism towards non-EU education systems, regardless of individual experience or skill level.[453] **Approximately 45% of CSOs and trade unions** also refer to mistrust as a driver of under-employment and occupational downgrading, as qualified TCNs are forced to accept jobs that are below their qualification level. By contrast, **around 25% of public authorities** frame trust issues primarily in relation to verification and authenticity concerns, focusing on the reliability, credibility, and formal validation of information.[454]

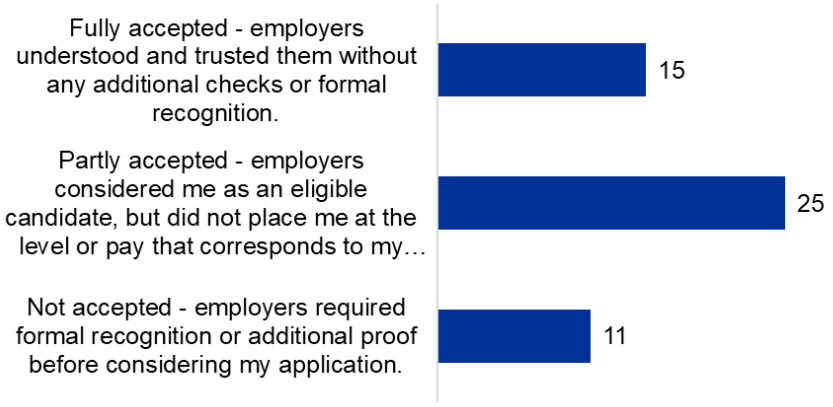
Recognition frameworks in the EU were originally designed to support intra-EU mobility and are grounded in mutual trust between Member States' education and training systems. This presumption of trust does not extend to third countries, whose qualifications are instead treated as inherently uncertain and subject to intensified scrutiny.[455]

This asymmetry is reinforced by the legal architecture governing recognition. Directive 2005/36/EC establishes mutual recognition mechanisms for EU professionals but does not create a coherent framework for TCQs. As a result, trust in third-country systems is not institutionalised at EU level but assessed indirectly and inconsistently through national procedures.[456]

In practice, this lack of trust and understanding manifests through **case-by-case equivalence assessments** and **extensive documentary requirements** that go beyond what is typically required for EU qualifications. In fact, 36 respondents with TCQs out of 51 highlighted that employers either do not accept TCQs and skills unless there is a formal recognition (11 respondents out of 51) or only partly accept them (25 respondents out of 51), placing TCNs at a level below their actual skills and pay range (see Figure 54 below).[457] TCNs are therefore often asked to provide detailed curricula, training plans or institutional confirmations that are difficult or impossible to obtain, particularly where education systems operate under different administrative or documentation standards.[458]

[452] PC results. Q25 "Do you think there are other issues that make it harder for people to have their skills and qualifications understood, recognised and valued in another country?" (n=486)
[453] PC results. Q25 "Do you think there are other issues that make it harder for people to have their skills and qualifications understood, recognised and valued in another country?" (n=486)
[454] PC results. Q25 "Do you think there are other issues that make it harder for people to have their skills and qualifications understood, recognised and valued in another country?" (n=486)
[455] Contribution to the call for evidence (ZDH; ONCD; IOM).
[456] Contribution to the call for evidence (IOM).
[457] PC results. Q28 "To what extent were the qualifications that you acquired in a different country accepted by employers?" (n=51)
[458] Contribution to the call for evidence (Taflan GmbH; ENSIE; DKG).

Figure 54 - To what extent were the qualifications that you acquired in a different country accepted by employers? (n=51)[459]



Source: Author's own elaboration based on the PC

Stakeholders link this trust deficit directly to labour market inefficiencies and skill underuse, including mainly **overqualification** (16 respondents out of 51) and **failure to fill in a vacancy** (14 respondents out of 51) and (see Figure 55 below).[460] IOM highlights that limited portability of TCQs contributes to structural underemployment, noting that 39,6% of tertiary-educated TCNs are employed below their qualification level. Recognition barriers are thus framed not only as administrative obstacles, but as a factor undermining talent attraction, retention and effective labour market integration.[461]

Figure 55 - How did this affect how well your job matched your qualifications? (n=51)



Source: Author's own elaboration based on the PC

At the same time, sectoral authorities and trade unions caution that **trust-building measures must not result in automatic recognition or the erosion of public interest safeguards**. In regulated professions, particularly healthcare, stakeholders stress that any EU-level action should respect Member State discretion and ensure patient safety.[462] Trade unions further emphasise that improved trust and facilitated recognition should support

[459] PC results. Q28 "To what extent were the qualifications that you acquired in a different country accepted by employers?" (n=51)
[460] PC results. Q29 "How did this affect how well your job matched your qualifications?" (n=51)
[461] Contribution to the call for evidence (IOM).
[462] Contribution to the call for evidence (ONCD; EFN).

equal treatment and procedural fairness, including the right to challenge recognition decisions, and should not lead to systematic downgrading of TCQs.[463]

Annex 10.2.6 Doubts regarding the efficacy of quality assurance systems in third countries

In addition to transparency and trust deficits, several stakeholder contributions point to persistent **doubts about the effectiveness, consistency and reliability of QA systems in third countries** as a factor shaping restrictive recognition practices. These concerns are not always articulated as explicit critiques of third-country education systems but rather emerge implicitly through the way recognition procedures are designed and justified, particularly in regulated professions and safety-critical sectors.[464]

CAs and sectoral stakeholders underline that, unlike EU education and training systems, where QA frameworks are embedded in shared governance structures and subject to peer review, **third-country QA arrangements are often insufficiently known, unevenly documented or difficult to verify from an EU perspective**.[465] As a consequence, authorities tend to adopt a precautionary approach, relying on intensive individual scrutiny rather than systemic recognition.

This uncertainty is particularly visible in **regulated professions**, where public interest considerations such as patient safety or consumer protection are paramount. Health sector stakeholders stress that doubts about the robustness of quality assurance in third-country education and training justify maintaining strict controls over recognition, even where shortages are acute.[466] From this perspective, recognition is not only a technical exercise in comparability, but also an assessment of whether training systems are subject to equivalent quality controls, supervision and enforcement mechanisms.

Employers and professional bodies similarly point out that **variability in QA standards across third countries complicates recognition decisions.** Contributions indicate that even within the same country, training quality may differ significantly between institutions, further limiting the usefulness of blanket assumptions or simplified recognition pathways.[467] This reinforces the tendency toward curriculum-based and institution-specific assessments as a compensatory mechanism.[468]

At the same time, several **stakeholders appear to implicitly question whether current recognition practices genuinely assess quality, or whether they primarily assess the availability of documentation**.[469] Employer evidence suggests that missing or inaccessible curricula are often treated as proxies for insufficient quality assurance, even where professional competences are demonstrably strong.[470] . In practice, recognition authorities

[463] Contribution to the call for evidence (ETUC).
[464] Contribution to the call for evidence (ONCD; EFN; CCBC).
[465] Contribution to the call for evidence (ONCD; ZDH).
[466] Contribution to the call for evidence (ONCD; EFN).
[467] Contribution to the call for evidence (CCBC; DKG).
[468] Contribution to the call for evidence (CCBC; DKG).
[469] Contribution to the call for evidence (Taflan GmbH, ONCD; CCBC; ECCVT).
[470] Contribution to the call for evidence (Taflan GmbH).

often rely on the availability of formal training curricula or framework plans as indirect indicators of quality assurance, using them as a proxy to assess whether a qualification meets expected standards. Where such curricula are missing, inaccessible or not digitally available, as is frequently the case for TCQs, this absence tends to be interpreted as signalling weaker quality control, even when professional competences can be demonstrated through other means.[471] Employer evidence shows that this approach privileges documentary alignment with national training pathways over substantive, practice-based assessments of skills, resulting in situations where extensive professional experience, work samples or employer-led competence evaluations are systematically undervalued. As a result, the lack of accessible curricula can outweigh concrete evidence of professional capability, effectively substituting procedural checks for a direct assessment of skills and excluding experienced workers whose competences are objectively comparable to domestic standards.[472]

Several contributions therefore suggest that addressing QA concerns requires institutional trust-building rather than stricter individual scrutiny. Proposals for EU-level reference tools, pre-assessed lists of qualifications or providers, and structured cooperation with competent authorities are framed as ways to establish shared confidence in minimum quality standards for selected TCQs,[473] preserving Member State discretion and avoid lowering standards.[474]

Annex 10.3 EU tools and actions

The EU has developed an extensive set of tools and frameworks to support transparency, comparability, recognition of qualifications and validation of skills across the Single Market. These instruments constitute an important foundation for facilitating labour market integration. However, evidence from the PC indicates that, for TCNs, the current ecosystem remains fragmented, underused and insufficiently adapted to non-EU contexts, limiting its practical effectiveness.

Annex 10.3.1 Existing EU tools and current level of awareness

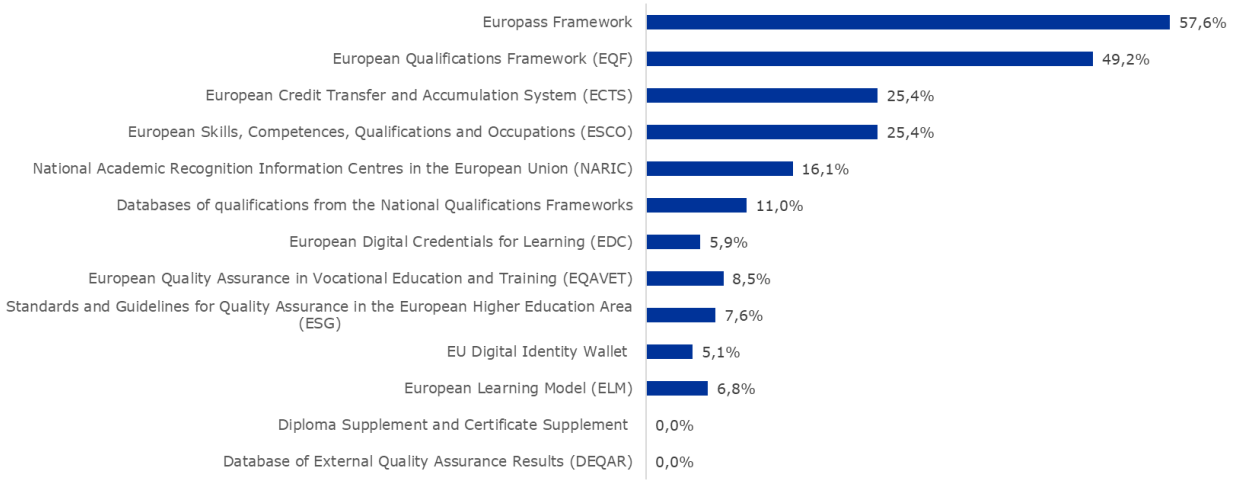
Awareness of EU transparency and recognition tools varies significantly across instruments. Long-standing and more visible tools are substantially better known than newer or more technical instruments. In particular, **the Europass Framework and the EQF are the most widely recognised tools**, each known by 57,6% and 49,2% of respondents respectively. These are followed by the **ECT)** (25,4%), **ESCO** (25,4%) and **NARIC**(16,1%) (see Figure 56).

By contrast, awareness of other EU tools remains very limited. Instruments such as EDC, EQAVET, ESG, the EU Digital Identity Wallet, the ELM, national qualification framework databases and DEQAR are each known by fewer than 15% of respondents, and in some cases by fewer than 5%. This uneven knowledge base suggests that **the challenge is not**

[471] Contribution to the call for evidence (Taflan GmbH
[472] Contribution to the call for evidence (Taflan GmbH
[473] Contribution to the call for evidence (ONCD; CCBC; ECCVT).
[474] Contribution to the call for evidence (ETUC; ONCD).

the absence of EU tools, but rather their limited visibility, accessibility and perceived relevance for non-EU applicants.

Figure 56 - With which of the following EU tools supporting transparency and comparability of skills and qualifications are you familiar? (Select all that apply) (n=118)



Source: Author's own elaboration based on the PC

Annex 10.3.2 Key limitations from a TCN perspective

Qualitative responses reveal a set of recurring challenges related to the way EU tools and recognition procedures currently operate for TCNs. A dominant theme concerns the **complexity and opacity of existing systems**. Respondents highlighted that qualification recognition and equivalence assessments are difficult to understand for non-EU applicants, who often face unfamiliar education structures, terminology and documentation requirements.[475]

Many respondents reported that **recognition procedures do not adequately take account of professional experience, partial equivalence, or compensatory pathways**. Concrete examples were provided across several regulated professions, including law, engineering, geodesy and healthcare, where individuals with extensive work experience or willingness to undergo adaptation measures were nonetheless unable to obtain recognition.[476] In these cases, applicants reported having no opportunity to clarify their situation or discuss individual circumstances with competent authorities, leading to long waiting periods and uncertain outcomes.[477]

Respondents also underlined persistent difficulties in distinguishing between **academic recognition** and **professional qualification recognition**, both for applicants and for employers, resulting in the requirement of academic qualifications even in cases where

[475] PC results. Q60. "Would you suggest changes to any of the above tools to enhance the portability of skills and qualifications in the single market? If so, please elaborate." (n=486)
[476] PC results. Q60. "Would you suggest changes to any of the above tools to enhance the portability of skills and qualifications in the single market? If so, please elaborate." (n=486)
[477] PC results. Q60. "Would you suggest changes to any of the above tools to enhance the portability of skills and qualifications in the single market? If so, please elaborate." (n=486)

practical experience is more relevant and a professional qualification could be sufficient. This lack of clarity contributes to under-utilisation of skills, occupational downgrading and delays in labour market integration.[478] Additional obstacles were identified in relation to the recognition of distance-learning qualifications, professional certificates, military-to-civilian skill transfers and continuing professional development, which are handled inconsistently across Member States.[479]

Annex 10.3.3 Identified priorities for improving EU tools

Despite these limitations, **respondents did not generally call for the creation of new instruments. Instead, there was strong convergence around the need to simplify, better integrate and upgrade existing EU tools**.[480] A frequently repeated proposal was the creation of a **single, unified EU access point for skills and qualifications,** allowing users to understand, compare and apply existing instruments more easily.[481] Europass was often identified as the most visible tool and therefore a natural anchor for such an approach, provided that its interface and navigation are significantly improved.[482]

Digitalisation and interoperability were repeatedly highlighted as key enablers. Respondents called for verifiable, **machine-readable digital credentials** that could be shared across borders, integrated with the **EU Digital Identity Wallet**, and automatically recognised by competent authorities and employers.[483] Several contributions explicitly advocated for **stronger operational links between ESCO, EQF, national qualification databases and recognition bodies,** so that qualifications are assessed not only by title, but also through transparent and comparable descriptions of skills and competences.[484]

A number of respondents also stressed the need for **EU tools to provide clear trust signals for employers,** including information on professional-body membership, good standing and continuing professional development, and for better guidance on the legal effects of recognition decisions.[485]

[478] PC results. Q60. “Would you suggest changes to any of the above tools to enhance the portability of skills and qualifications in the single market? If so, please elaborate.” (n=486)
[479] PC results. Q60. “Would you suggest changes to any of the above tools to enhance the portability of skills and qualifications in the single market? If so, please elaborate.” (n=486)
[480] PC results. Q60. “Would you suggest changes to any of the above tools to enhance the portability of skills and qualifications in the single market? If so, please elaborate.” (n=486)
[481] PC results. Q60. “Would you suggest changes to any of the above tools to enhance the portability of skills and qualifications in the single market? If so, please elaborate.” (n=486)
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[485] PC results. Q60. “Would you suggest changes to any of the above tools to enhance the portability of skills and qualifications in the single market? If so, please elaborate.” (n=486)

Annex 10.3.4 Limits of current comparability approaches and the need for competence-based instruments

Stakeholders further emphasise that **existing comparability tools do not adequately support real-world decision-making,** particularly in recruitment and professional recognition contexts.[486] Mapping a qualification to an **EQF or National Qualifications Framework (NQF) level** provides only an abstract indication of educational attainment and does not convey sufficient information on concrete competences, professional tasks or occupational readiness. Employers underline that, for recruitment purposes, framework-level classification alone is insufficient to determine whether a candidate can effectively perform specific functions in practice, especially in regulated or technically complex occupations.[487]

In the absence of robust **competence-based reference points**, recognition procedures tend to revert to **curriculum-based comparisons**, focusing on programme structure, duration and course content rather than learning outcomes or demonstrated professional practice.[488] Stakeholders stress that this approach systematically disadvantages TCNs, as third-country education and training programmes rarely mirror EU national pathways in structure or length, even where the underlying professional activities, standards and methods are functionally equivalent.[489] As a result, findings of "substantial differences" are frequently reported, despite evidence of effective occupational performance in real-world work settings.

Concrete employer evidence illustrates these shortcomings. For example, skilled crafts workers from Türkiye were denied full recognition in Germany due to missing or inaccessible curricula, despite decades of professional experience and the use of identical work processes, tools and manufacturer standards to those applied domestically.[490] Such cases highlight how a rigid reliance on documentary equivalence, rather than competence and practice, undermines trust in outcomes and leads to the under-utilisation of skills.

Several stakeholders therefore argue that the primary gap does not lie in the lack of additional classification layers, but in the absence of **shared, reusable comparability instruments** capable of translating TCQs into **intelligible and credible competence signals**.[491] Proposed solutions include the development of **EU-level reference repositories or comparability statements** for frequently encountered TCQs, developed in cooperation with competent authorities, as well as **pre-assessed lists of qualifications or providers**

[486] PC results. Q60. "Would you suggest changes to any of the above tools to enhance the portability of skills and qualifications in the single market? If so, please elaborate." (n=486); Contribution to the call for evidence – Confederation of Danish Employers
[487] PC results. Q60. "Would you suggest changes to any of the above tools to enhance the portability of skills and qualifications in the single market? If so, please elaborate." (n=486); Contribution to the call for evidence – Confederation of Danish Employers
[488] PC results. Q60. "Would you suggest changes to any of the above tools to enhance the portability of skills and qualifications in the single market? If so, please elaborate." (n=486)
[489] PC results. Q60. "Would you suggest changes to any of the above tools to enhance the portability of skills and qualifications in the single market? If so, please elaborate." (n=486); Contribution to the call for evidence – Taflan GmbH; CCBC; EFN; Confederation of Danish Employers
[490] PC results. Q60. "Would you suggest changes to any of the above tools to enhance the portability of skills and qualifications in the single market? If so, please elaborate." (n=486); Contribution to the call for evidence – Taflan GmbH
[491] PC results. Q60. "Would you suggest changes to any of the above tools to enhance the portability of skills and qualifications in the single market? If so, please elaborate." (n=486)

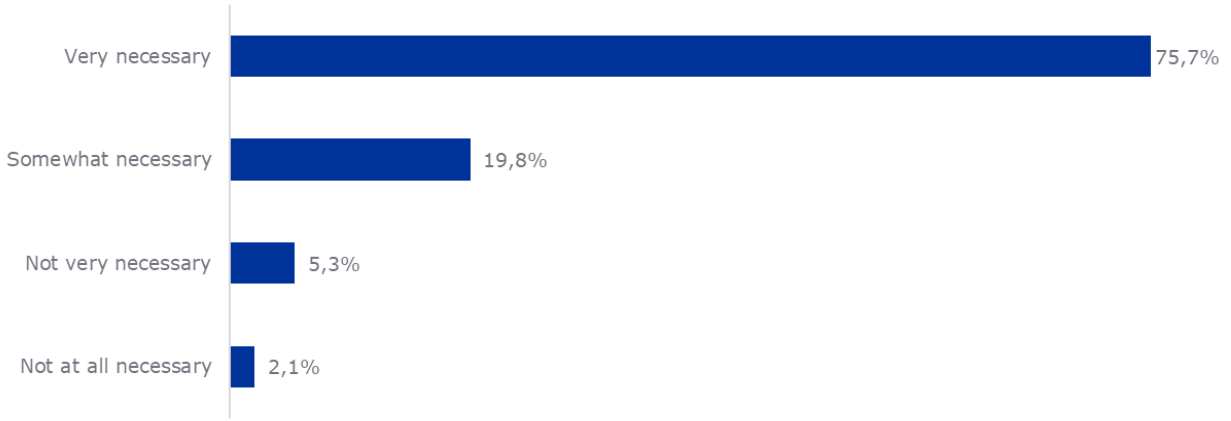
meeting minimum quality standards for priority regulated professions.[492] Stakeholders emphasise that such tools could improve transparency, reduce duplication of assessments and enhance predictability of outcomes, without harmonising national qualification standards or encroaching on Member State competences.

A concrete example of existing good practice is the **EU Skills Profile Tool for TCNs**, which provides a structured methodology for identifying prior learning and competences, particularly in situations where documentation is incomplete or unavailable.[493] When implemented by trained professionals and linked to **Europass profiles**, the tool can be effective in making skills visible and supporting early skills identification. However, stakeholders caution that its impact remains limited unless it is fully embedded within recognition pathways and systematically connected to validation procedures and follow-up measures, rather than applied as a stand-alone instrument.[494]

Annex 10.3.5 Strong support for EU-level action

The consultation demonstrates overwhelming support for EU-level action to simplify recognition and validation procedures for qualifications and skills acquired outside the EU. More than three quarters of respondents (75,7%) consider such action **very necessary**, while a further 19,8% consider it **somewhat necessary**. Only a small minority consider EU intervention as not necessary (see Figure 57).

Figure 57 - To what extent do you think EU-level action is necessary to simplify the way in which people who have acquired qualifications or skills outside the EU can get them recognised in the EU so that they can access the EU labour market? (n=486)



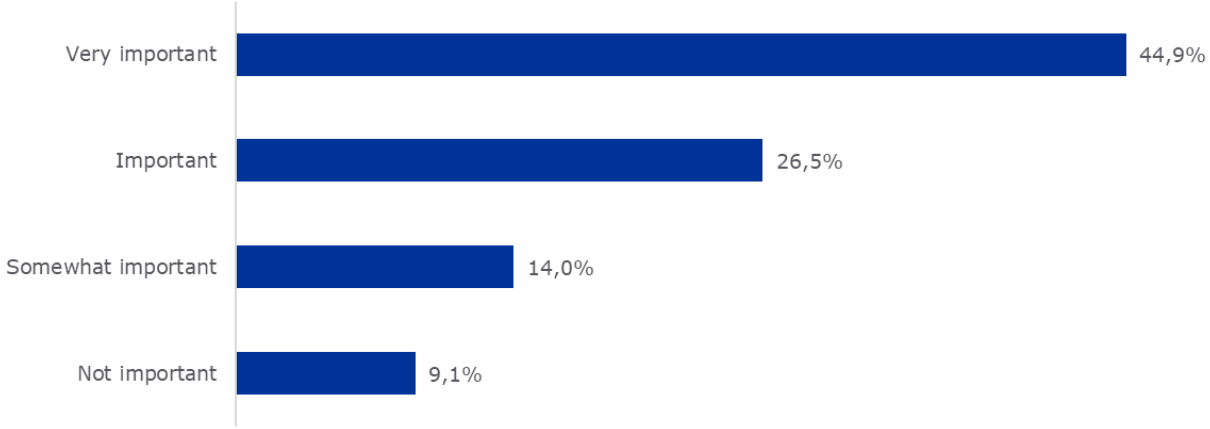
Source: Author's own elaboration based on the PC

At the same time, respondents strongly emphasised the strategic importance of attracting skilled non-EU nationals. Almost three quarters consider this **very important or important**

[492] PC results. Q60. "Would you suggest changes to any of the above tools to enhance the portability of skills and qualifications in the single market? If so, please elaborate." (n=486); Contribution to the call for evidence – CCBC; ECCVT; DKG
[493] PC results. Q60. "Would you suggest changes to any of the above tools to enhance the portability of skills and qualifications in the single market? If so, please elaborate." (n=486); Contribution to the call for evidence – ENSIE
[494] PC results. Q60. "Would you suggest changes to any of the above tools to enhance the portability of skills and qualifications in the single market? If so, please elaborate." (n=486); Contribution to the call for evidence – ENSIE

for their sector or country, reflecting widespread recognition of the role that TCNs can play in addressing current and future labour market needs (see Figure 58).

Figure 58 - In your view, how important is it for your sector or your country to attract skilled non-EU nationals to address current and future labour market needs? (n=486)



Source: Author's own elaboration based on the PC

Taken together, the evidence suggests that the EU already possesses a comprehensive but under-exploited toolbox. The primary challenge lies in transforming this set of instruments into a **coherent, interoperable and user-centred ecosystem**, supported by targeted EU-level action and regulatory adaptation, capable of ensuring faster, fairer and more transparent recognition and validation of the skills and qualifications of TCNs.

Annex 10.4 EU solutions

In terms of potential EU-level solutions, the PC explored stakeholders' views on the **creation of a system whereby qualifications, training certificates, and evidence of skills could be issued as verifiable and transparent digital credentials, interoperable and recognisable across EU Member States.** Such a system would enable individuals to securely share their qualifications with employers or competent authorities in other countries, while allowing these actors to verify authenticity efficiently and reliably, including across borders.

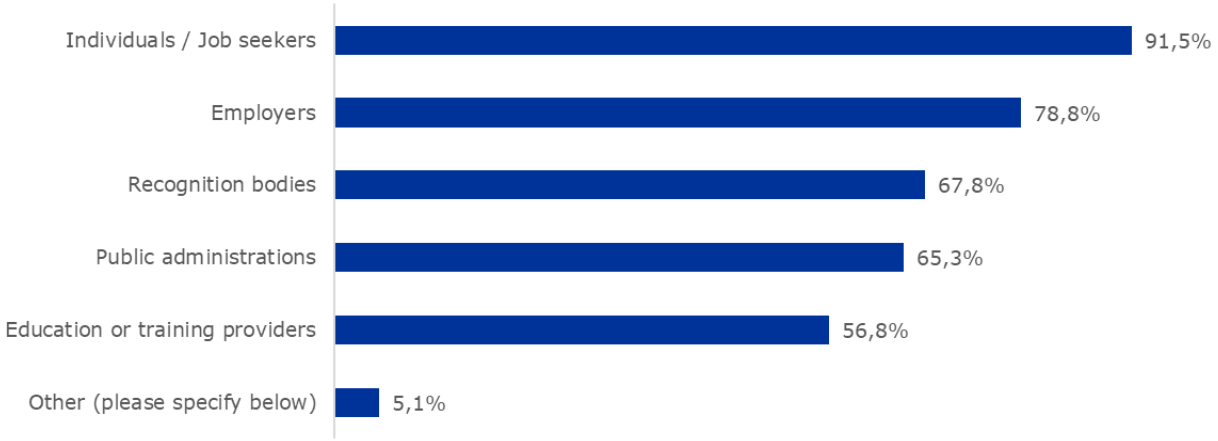
Among individual with TCQs and stakeholders directly involved in the recruitment, employment, and support of TCNs (including employers, business associations, and CSOs) (n=118) **support for this option is overwhelmingly high.** Overall, 91,5% of respondents in these groups consider that an EU-wide system of digital credentials would benefit TCNs and EU citizens with TCQs,[495] a view that is even more pronounced among individual TCNs themselves (58 respondents out of 61).[496] This strong consensus reflects widespread acknowledgement that fragmented, paper-based, and nationally-specific procedures remain a key barrier to the effective recognition of qualifications and validation of skills obtained outside the EU. Importantly, the consultation also highlights the **cost-reduction potential**

[495] PC results. Q67. "Do you think such a system would lead to cost savings or reductions in administrative burden for any of the groups below? (select all that apply)." (n=118)
[496] PC results. Q67. "Do you think such a system would lead to cost savings or reductions in administrative burden for any of the groups below? (select all that apply)." (n=61)

of digital credentials for individual TCNs. For example, one TCN supporting the EU-wide digital system explicitly noted that it could significantly reduce the financial burden associated with recognition procedures, notably costs related to apostilles, certified translations, and repeated document submissions. This suggests that, beyond improving trust and efficiency, **an EU-wide digital credentials framework could directly enhance accessibility and fairness in recognition and validation processes**, particularly for non-EU graduates and workers with limited resources.

Beyond individual TCNs, respondents identified a broad range of institutional and labour-market actors that would also benefit from such a system. **Employers** are seen as key beneficiaries (78,8%), given the potential to reduce uncertainty, delays, and administrative burden in recruitment processes. **Recognition bodies** (67,8%) and **public administrations** (65,3%) are likewise expected to benefit from more streamlined, standardised, and reliable verification procedures, while **education and training providers** (56,8%) could gain from improved transparency and comparability of credentials across systems (see Figure 26).[497] In addition, respondents pointed to specific professional groups – particularly those in regulated professions and technical occupations – as groups for whom faster and more trustworthy verification mechanisms would be especially valuable.

Figure 59 - Do you think such a system would lead to cost savings or reductions in administrative burden for any of the groups below? (select all that apply) (n= 118)



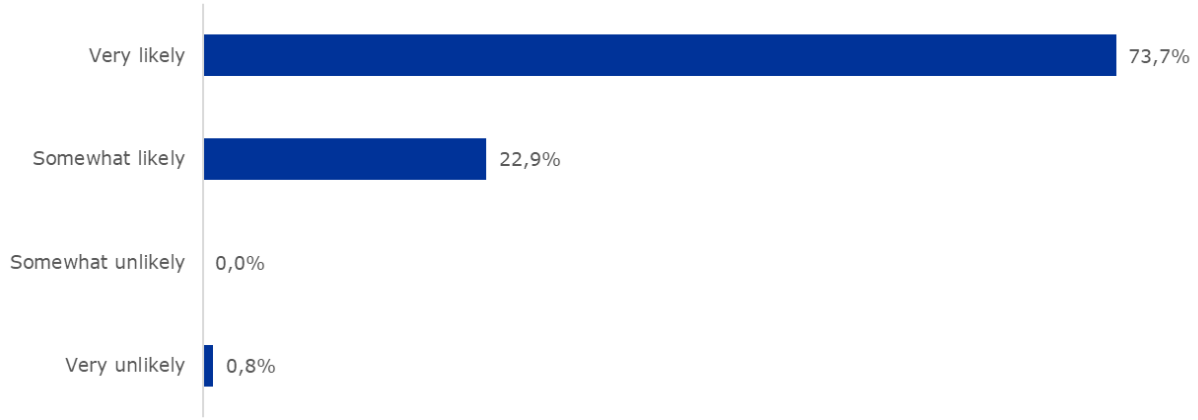
Source: Author's own elaboration based on the PC

Moreover, the overwhelming majority of stakeholders (96,6%) report that they would be either very likely (73,7%) or somewhat likely (22,9%) to use and/or accept (depending on their role) EU-wide digital credentials for qualifications and skills (see Figure 60).[498] Support is even stronger among **individual TCNs**, as all respondents **indicate willingness to use such a system**.[499] This near-universal uptake intention suggests that **digital credentials are perceived not merely as a technical improvement, but as a practical and credible tool to address persistent barriers in qualification recognition and skills validation**. Notably, scepticism was expressed by only one CSO, which raised concerns related to the

[497] PC results. Q67. "Do you think such a system would lead to cost savings or reductions in administrative burden for any of the groups below? (select all that apply)." (n=118)
[498] PC results. Q68. "If EU-wide digital credentials for qualifications and skills were available, how likely would you be to use them and/or accept them if someone were to share them with you? (n=118)
[499] PC results. Q68. "If EU-wide digital credentials for qualifications and skills were available, how likely would you be to use them and/or accept them if someone were to share them with you? (n=61)

perceived ineffectiveness and inefficiency of digital credentials, underscoring that resistance to this solution remains marginal among consulted stakeholders.[500]

Figure 60 - If EU-wide digital credentials for qualifications and skills were available, how likely would you be to use them and/or accept them if someone were to share them with you? (n=118)



Source: Author's own elaboration based on the PC

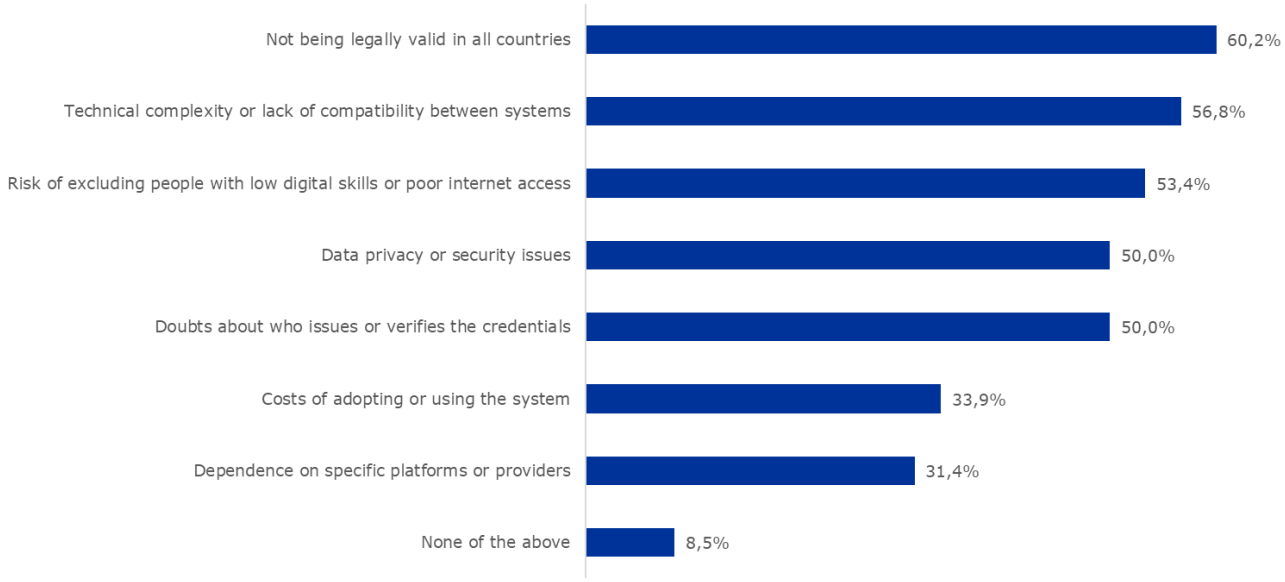
Notwithstanding the strong overall support, **stakeholders also highlighted a number of significant concerns** that could arise if such a unified digital system were to be implemented (see Figure 61). The most frequently cited issue relates to the **risk of continued fragmentation in the legal validity and recognition of digital credentials across Member States**, mentioned by 60,2% of respondents. Closely linked to this, 56,8% of stakeholders pointed **to challenges associated with technical complexity and the lack of comparability across existing systems**, reflecting concerns that differences in standards, formats, or infrastructures could undermine interoperability and trust. The **risk of exclusion for individuals with low digital skills or limited access to reliable internet connectivity**, was also prominent, with 53,4% of respondents underlining the importance of ensuring that digitalisation measures do not exacerbate existing inequalities among TCNs.[501]

An equally high share of stakeholders (50%) warned of the **data protection and security considerations**, expressing concerns about the handling of sensitive personal data, particularly in cross-border contexts. Similarly, 50% of respondents raised doubts **regarding the authority and credibility of the entities responsible for issuing and verifying digital credentials**, indicating that trust in the governance and oversight of the system would be a critical precondition for its acceptance.[502]

By contrast, concerns related to financial **costs of adoption** and **dependence on platform providers** were mentioned by a comparatively smaller share of stakeholders (33,9% and 31,4%, respectively). This suggests that, while resource implications are not negligible, **stakeholders perceive legal, technical, and governance challenges - rather than economic ones - as the primary obstacles to the effective deployment of an EU-wide digital credentials system.**

[500] PC results. Q68. "If EU-wide digital credentials for qualifications and skills were available, how likely would you be to use them and/or accept them if someone were to share them with you? (n=118)
[501] PC results. Q68. "If EU-wide digital credentials for qualifications and skills were available, how likely would you be to use them and/or accept them if someone were to share them with you? (n=118)
[502] PC results. Q68. "If EU-wide digital credentials for qualifications and skills were available, how likely would you be to use them and/or accept them if someone were to share them with you? (n=118)

Figure 61 - If EU-wide digital credentials for qualifications and skills were available, how likely would you be to use them and/or accept them if someone were to share them with you? (n=118)



Source: Author's own elaboration based on the PC

When asked about the **most helpful changes and improvements the EU could introduce to facilitate the presentation and sharing of qualifications**, particularly for TCNs, the majority of individuals with TCQs and stakeholders involved in their recruitment and support emphasised **system-level interoperability and transparency**. The most frequently cited priority was ensuring that **digital credentials are recognised and function seamlessly across all EU Member States** (69,5%), pointing to the need for consistent legal and technical acceptance throughout the Union.[503] Closely following this, 51,7% of respondents highlighted the **importance of establishing a shared EU-wide database of qualifications and standards**, accessible to all relevant actors, as a means to improve comparability and reduce uncertainty in recognition processes (see Figure 62).

By contrast, more operational or implementation-oriented measures were mentioned by a smaller share of stakeholders. These include facilitating education and training institutions in the **issuance of digital credentials** (35,6%), linking credentials to **single secure applications or digital wallets (26,3%),** particularly important for EU citizens with TCQs**,** and ensuring **easy and inclusive access** to digital credentials for individuals (25,4%)**.** This distribution suggests that stakeholders primarily perceive the main obstacles to effective qualification recognition for TCQs as lying at the level of **cross-border consistency and systemic trust**, rather than in the technical modalities of credential delivery alone.

[503] PC results. Q70. "If the EU could improve or create new online/digital ways for people to show and share their qualifications, which changes do you think would help the most?" (n=118)

Figure 62 - If the EU could improve or create new online/digital ways for people to show and share their qualifications, which changes do you think would help the most? (n=118)



Source: Author's own elaboration based on the PC

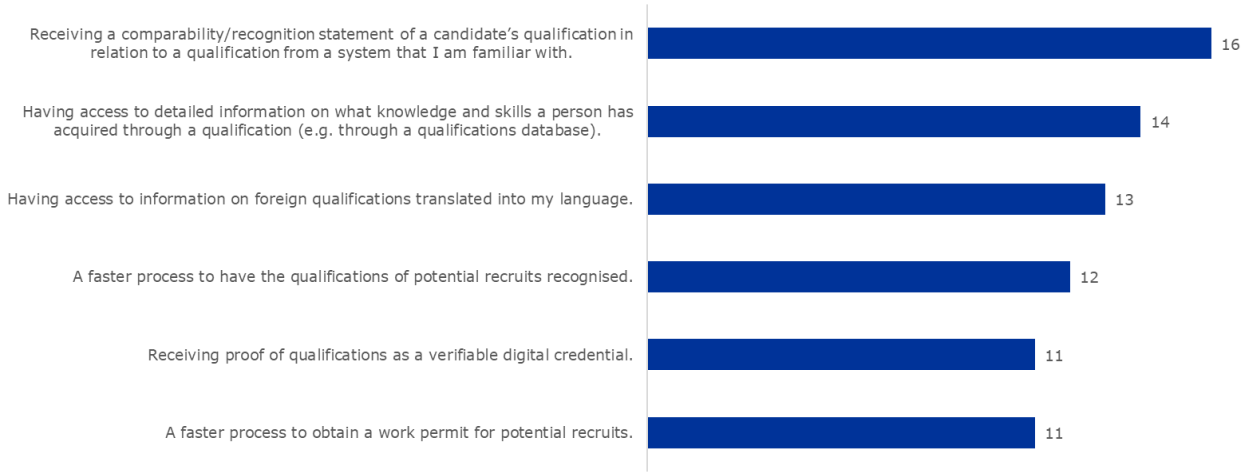
Lastly, a majority of employers, business associations, and CSOs involved in the recruitment of TCNs emphasised that receiving a **comparability or recognition statement** assessing a candidate's qualification against a familiar national or EU qualification would significantly facilitate the recruitment process (16 respondents out of 20) (see Figure 63).[504]

This is followed by the need for **enhanced access to detailed and reliable information on the knowledge and skills acquired by TCNs**, for instance through a structured qualifications or skills database, highlighted by 14 respondents out of 20. Access to **information on foreign qualifications translated into different EU languages** was also considered an important facilitator (13 respondents out of 20), reflecting persistent language-related barriers in recruitment and assessment procedures. In addition, **faster recognition procedures** were identified 12 stakeholders out of 20 consulted as a key improvement, underlining the time-sensitive nature of recruitment decisions.[505]

In contrast, a more moderate share of stakeholders (55%) pointed to the **usefulness of receiving proof of qualifications in the form of verifiable digital credentials**, as well as **faster procedures for obtaining work permits**. While still significant, the comparatively lower prioritisation of these measures suggests that employers and intermediaries primarily value tools that enhance **clarity, comparability, and speed of decision-making**, rather than purely technical innovations, unless these directly translate into more efficient and trustworthy recruitment outcomes.[506]

[504] PC results. Q71. "Would any of these situations make your process for recruiting people from another country easier and cheaper?" (select all that apply) (n=20)
[505] PC results. Q71. "Would any of these situations make your process for recruiting people from another country easier and cheaper?" (select all that apply) (n=20)
[506] PC results. Q71. "Would any of these situations make your process for recruiting people from another country easier and cheaper?" (select all that apply) (n=20)

Figure 63 - Would any of these situations make your process for recruiting people from another country easier and cheaper? (Select all that apply) (n=20).



Source: Author's elaboration based on the PC

Annex 10.5 Main themes emerging from call for evidence

Nine main macro-topics emerge from the public consultation and the related call for evidence. Several of these themes, most notably the fragmentation and complexity of recognition procedures, limited transparency and comparability of non-EU qualifications, and the lack of trust in third-country qualifications and quality assurance systems, directly reflect the drivers and core problem areas identified in the problem definition.

Other themes, including gaps in skills validation, the interaction between recognition and migration procedures, labour-market impacts, and the demand for EU-level action, are closely aligned with the identified implications and outcomes of the Study on the recognition of qualifications and validation of skills of TCNs (Action 3).

Taken together, these macro-topics illustrate how structural features of existing recognition and validation systems interact and reinforce one another, generating persistent barriers for TCNs across the recognition process and along the labour-market integration pathway.

Annex 10.5.1 Fragmentation and complexity of recognition procedures and the absence of a uniform EU pathway

Stakeholder evidence consistently describes **recognition procedures for TCNs as fragmented, complex and duplicative**, generating significant uncertainty and administrative burden for applicants, employers and public authorities alike.[507]

A core driver of this fragmentation is the **absence of a uniform EU pathway for the recognition of third-country qualifications**. While EU-level instruments such as EQF, ESCO and Europass support transparency, they do not establish common procedural rules or ensure convergence of recognition practices across Member States.[508]

Fragmentation operates both within and across Member States. Within the same Member State, third-country qualifications may be assessed multiple times for different

[507] Contribution to the call for evidence (IOM; ONCD; ECCVT).
[508] Contribution to the call for evidence (IOM).

purposes, notably by migration authorities and professional bodies. Across Member States, recognition practices diverge despite operating under the same EU legal framework.[509] Concrete examples from healthcare illustrate the consequences: complex and poorly coordinated procedures delay the use of available skills and undermine workforce planning (DKG).

Nonetheless, stakeholders caution, however, that simplification should not be equated with speed alone, as equivalence assessments require substantive technical judgment that shall be performed at national level.[510] Stakeholders therefore see EU added value primarily in procedural convergence, clear sequencing, reusable outcomes and timelines, without harmonising standards.[511]

Annex 10.5.2 Underdeveloped validation of non-formal and informal skills (critical for many TCNs and refugees)

Stakeholder evidence consistently highlights that recognition systems for TCNs remain **strongly centred on formal qualifications**, while skills acquired through **non-formal and informal learning**, including work experience, are insufficiently recognised or validated.[512] This gap is particularly consequential for TCNs and refugees, who disproportionately rely on work-based learning pathways due to disrupted education trajectories, displacement, or differences in education systems.[513]

International Organisations (IOs) stress that existing recognition pathways focus primarily on formal diplomas and certificates, while **systematic assessment of skills acquired through work experience or informal learning is uneven or absent** across Member States.[514] Where documentation is missing or incomplete (e.g. as it is often the case for the most disadvantaged groups including refugees and undocumented migrants), recognition procedures often stall rather than offering structured alternative pathways. Therefore IOs call for the integration of **recognition of prior learning (RPL)** as a core component of recognition systems, including clear, structured routes for validating competences where formal evidence cannot be provided.[515] This would particularly benefit refugees and TCNs who acquire substantial skills through **real work environments**, including through work integration social enterprises (WISEs), that remain largely invisible in current recognition and validation systems.[516] In addition, one IO argues that WISEs should be explicitly acknowledged as legitimate environments for skills acquisition and that validation mechanisms should be adapted to capture learning outcomes from work-based and informal contexts, particularly when formal documentation is unavailable.[517]

Trade unions frame the lack of effective validation of non-formal and informal skills as both a labour market and a social issue, emphasising that when skills acquired through experience are not recognised, TCNs are systematically exposed to **deskilling and downward occupational mobility**, even when they possess relevant competences.[518] Prolonged non-recognition increases dependency on employers or intermediaries and

[509] Contribution to the call for evidence (ONCD; ECCVT).
[510] Contribution to the call for evidence (COLEF).
[511] Contribution to the call for evidence (IOM; Confederation of Danish Employers).
[512] Contribution to the call for evidence (IOM; ENSIE; ETUC; CONFLAVORO; Taflan GmbH).
[513] Contribution to the call for evidence (IOM; ENSIE).
[514] Contribution to the call for evidence (IOM; ENSIE).
[515] Contribution to the call for evidence (IOM).
[516] Contribution to the call for evidence (ENSIE).
[517] Contribution to the call for evidence (ENSIE).
[518] Contribution to the call for evidence (ETUC).

heightens vulnerability to exploitation, underscoring that access to validation is also a matter of equal treatment and worker protection.[519]

Employers, particularly SMEs, confirm that this misalignment between recognition systems and labour market realities undermines efficient recruitment.[520] In many sectors, especially craft, services and production-oriented occupations, **practical experience is often more relevant than formal diplomas**. However, **employers have limited tools to rely on such experience** when recognition systems do not provide credible and trusted validation mechanisms. As a result, employers may be unable to mobilise available skills or may abandon recruitment of TCNs despite clear operational needs.[521]

Overall, stakeholders argue that the gaps in validation mechanisms reflect a **weak operationalization, rather than** a lack of policy intent. In fact, while EU frameworks and instruments acknowledge non-formal and informal learning in principle, stakeholders argue that these remain insufficiently embedded in recognition procedures for third-country qualifications. Validation pathways are often optional, fragmented or project-based, rather than integrated into mainstream recognition processes.[522]

At the same time, stakeholders emphasise that effective validation of non-formal and informal skills requires **credibility, transparency and trust**. In fact, validation mechanisms should involve social partners and reflect **production realities**, so that assessed competences are meaningful for hiring decisions and outcomes must be portable, transparent and subject to quality assurance.[523]

A concrete example of good practice is provided by the **EU Skills Profile Tool for Third Country Nationals**: a structured instrument for identifying prior learning and competences, particularly when implemented by trained professionals and linked to Europass profiles. Such tools can be effective in making skills visible where documentation is lacking, but only if they are embedded in recognition pathways and connected to validation and follow-up measures, rather than used in isolation.[524]

Annex 10.5.3 Limited transparency and comparability of non-EU qualifications

Stakeholder evidence consistently identifies **limited transparency** and **weak practical comparability of third-country qualifications** as a major impediment to effective recognition of TCNs skills and qualifications. This limitation is not primarily linked to the quality of third-country education and training, but to the absence of accessible, standardised and trusted information allowing authorities and employers to interpret non-EU qualifications in a consistent and operational manner.[525]

Employers and competent authorities report **persistent difficulties in accessing reliable information on curricula, training content, learning outcomes and awarding bodies for third-country qualifications**. Where such information exists, it is often fragmented, non-digitised or not available in a format usable for recognition procedures, forcing

[519] Contribution to the call for evidence (ETUC, IOM).
[520] Contribution to the call for evidence (CONFLAVORO; Taflan GmbH).
[521] Contribution to the call for evidence (CONFLAVORO; Taflan GmbH).
[522] Contribution to the call for evidence (ETUC, IOM).
[523] Contribution to the call for evidence (ETUC, CONFLAVORO).
[524] Contribution to the call for evidence (ENSIE).
[525] Contribution to the call for evidence (Taflan GmbH; ZDH; ONCD).

authorities to rely on ad hoc document requests and individualised assessments).[526] As a result, recognition decisions are frequently made under conditions of informational uncertainty, increasing both processing times and the risk of divergent outcomes.

Stakeholders further emphasise that current **comparability tools do not adequately support real-world decision-making**. Mapping a qualification to an EQF or NQF level provides only an abstract indication of educational level and does not convey sufficient information on concrete competences, professional tasks or occupational readiness. Employers underline that, in recruitment contexts, framework-level classification alone is insufficient to assess whether a candidate can perform specific functions in practice, particularly for regulated or technically complex occupations.[527] In fact, in the absence of robust competence-based reference points, **recognition procedures tend to default to curriculum-based comparisons rather than learning outcomes or professional practice.** This approach systematically disadvantages TCNs, as third-country training programmes rarely mirror national education pathways in structure or duration, even where professional activities and standards are equivalent.[528] Consequently, findings of "substantial differences" are frequently reported despite functional equivalence in the workplace. Concrete employer evidence illustrates these shortcomings. For example, skilled crafts workers from Türkiye were denied full recognition due to missing or inaccessible curricula, despite decades of professional experience and the use of identical work processes and manufacturer standards to those applied in Germany.[529]

Several stakeholders therefore argue that what is missing is not additional classification layers, but shared and reusable comparability instruments capable of translating third-country qualifications into intelligible competence signals. Proposals include EU-level reference repositories or comparability statements for frequently encountered third-country qualifications, developed in cooperation with competent authorities,[530] as well as pre-assessed lists of qualifications or providers meeting minimum standards for priority regulated professions.[531] These tools are presented as means to improve transparency, reduce duplication and enhance predictability, without harmonising national qualification standards.

Annex 10.5.4 Structural lack of trust in third-country qualification systems

Beyond transparency gaps, stakeholders identify a **lack of trust in third-country qualification systems.** Recognition frameworks in the EU were originally designed to support intra-EU mobility and are grounded in mutual trust between Member States' education and training systems. This presumption of trust does not extend to third countries, whose qualifications are instead treated as inherently uncertain and subject to intensified scrutiny.[532]

This asymmetry is reinforced by the legal architecture governing recognition. Directive 2005/36/EC establishes mutual recognition mechanisms for EU professionals but does not create a coherent framework for third-country qualifications. As a result, trust in third-country

[526] Contribution to the call for evidence (Taflan GmbH; ZDH).
[527] Contribution to the call for evidence (Confederation of Danish Employers).
[528] Contribution to the call for evidence (Taflan GmbH; CCBC; EFN; Confederation of Danish Employers)
[529] Contribution to the call for evidence (Taflan GmbH)
[530] Contribution to the call for evidence (ONCD)
[531] Contribution to the call for evidence (CCBC; ECCVT; DKG).
[532] Contribution to the call for evidence (ZDH; ONCD; IOM).

systems is not institutionalised at EU level but assessed indirectly and inconsistently through national procedures.[533]

In practice, this lack of trust manifests through **case-by-case equivalence assessments** and **extensive documentary requirements** that go beyond what is typically required for EU qualifications. TCNs are often asked to provide detailed curricula, training plans or institutional confirmations that are difficult or impossible to obtain, particularly where education systems operate under different administrative or documentation standards.[534] These requirements reflect a precautionary approach driven by uncertainty rather than by evidence of inadequate competence.

Stakeholders link this trust deficit directly to labour market inefficiencies and skill underuse. IOM highlights that limited portability of third-country qualifications contributes to structural underemployment, noting that 39.6% of tertiary-educated TCNs are employed below their qualification level. Recognition barriers are thus framed not only as administrative obstacles, but as a factor undermining talent attraction, retention and effective labour market integration.[535]

At the same time, sectoral authorities and trade unions caution that **trust-building measures must not result in automatic recognition or the erosion of public interest safeguards**. In regulated professions, particularly healthcare, stakeholders stress that any EU-level action should respect Member State discretion and ensure patient safety.[536] Trade unions further emphasise that improved trust and facilitated recognition should support equal treatment and procedural fairness, including the right to challenge recognition decisions, and should not lead to systematic downgrading of third-country qualifications.[537]

Annex 10.5.5 Doubts regarding the effectiveness and reliability of quality assurance systems in third countries

In addition to transparency and trust deficits, several stakeholder contributions point to persistent **doubts about the effectiveness, consistency and reliability of quality assurance (QA) systems in third countries** as a factor shaping restrictive recognition practices. These concerns are not always articulated as explicit critiques of third-country education systems but rather emerge implicitly through the way recognition procedures are designed and justified, particularly in regulated professions and safety-critical sectors.[538]

Competent authorities and sectoral stakeholders underline that, unlike EU education and training systems, where quality assurance frameworks are embedded in shared governance structures and subject to peer review, **third-country QA arrangements are often insufficiently known, unevenly documented or difficult to verify from an EU perspective**.[539] As a consequence, authorities tend to adopt a precautionary approach, relying on intensive individual scrutiny rather than systemic recognition.

This uncertainty is particularly visible in **regulated professions**, where public interest considerations such as patient safety or consumer protection are paramount. Health sector stakeholders stress that doubts about the robustness of quality assurance in third-country

[533] Contribution to the call for evidence (IOM).
[534] Contribution to the call for evidence (Taflan GmbH; ENSIE; DKG).
[535] Contribution to the call for evidence (IOM).
[536] Contribution to the call for evidence (ONCD; EFN).
[537] Contribution to the call for evidence (ETUC).
[538] Contribution to the call for evidence (ONCD; EFN; CCBC).
[539] Contribution to the call for evidence (ONCD; ZDH).

education and training justify maintaining strict controls over recognition, even where shortages are acute.[540] From this perspective, recognition is not only a technical exercise in comparability, but also an assessment of whether training systems are subject to equivalent quality controls, supervision and enforcement mechanisms.

Employers and professional bodies similarly point out that **variability in QA standards across third countries complicates recognition decisions.** Contributions indicate that even within the same country, training quality may differ significantly between institutions, further limiting the usefulness of blanket assumptions or simplified recognition pathways.[541] This reinforces the tendency toward curriculum-based and institution-specific assessments as a compensatory mechanism.[542]

At the same time, several **stakeholders appear to implicitly question whether current recognition practices genuinely assess quality, or whether they primarily assess the availability of documentation.**[543] Employer evidence suggests that missing or inaccessible curricula are often treated as proxies for insufficient quality assurance, even where professional competences are demonstrably strong.[544]

Several contributions therefore suggest that addressing quality assurance concerns requires institutional trust-building rather than stricter individual scrutiny. Proposals for EU-level reference tools, pre-assessed lists of qualifications or providers, and structured cooperation with competent authorities are framed as ways to establish shared confidence in minimum quality standards for selected third-country qualifications,[545] preserving Member State discretion and avoid lowering standards.[546]

Annex 10.5.6 Employer practices, trust mechanisms and verification (how do employers actually assess TCNs?)

Stakeholder evidence shows that **employers often rely on assessment and trust mechanisms that differ fundamentally from formal recognition procedures**, particularly when recruiting third-country nationals. While public recognition systems prioritise formal documentation, curriculum equivalence and administrative completeness, employers, especially in shortage sectors, tend to assess candidates through **competence-based, multi-stage and practice-oriented processes**.[547] This misalignment is repeatedly identified as a source of inefficiency and missed opportunities for skills utilisation.

Concrete employer evidence illustrates this gap. Some employers use a structured, multi-stage assessment process used to recruit skilled workers from third countries, combining video interviews, technical discussions, demonstrations of practical tasks, review of work history and supporting documentation.[548] While these assessments provide a robust picture of what candidates can do in real occupational settings, they are often **undervalued or disregarded by recognition authorities**, whose decisions remain anchored in formal curricula and documentation rather than demonstrated competence. This creates a practical

[540] Contribution to the call for evidence (ONCD; EFN).
[541] Contribution to the call for evidence (CCBC; DKG).
[542] Contribution to the call for evidence (CCBC; DKG).
[543] Contribution to the call for evidence (Taflan GmbH, ONCD; CCBC; ECCVT).
[544] Contribution to the call for evidence (Taflan GmbH).
[545] Contribution to the call for evidence (ONCD; CCBC; ECCVT).
[546] Contribution to the call for evidence (ETUC; ONCD).
[547] Contribution to the call for evidence (DKG; CONFLAVORO; Taflan GmbH; PMI).
[548] Contribution to the call for evidence (Taflan GmbH).

mismatch between recognition logic and occupational reality, particularly in sectors where skills are standardised through work processes rather than educational pathways.

Similarly, SMEs emphasise that the complexity of existing frameworks makes it difficult to translate recognition outcomes into operational hiring decisions. SMEs need **simple, usable decision-support tools** rather than abstract classifications.[549] They propose the development of an "SME Skills Snapshot" embedded in a digital wallet concept, which would summarise verified competences in a format aligned with production realities and SME capacity.[550] The emphasis is not on replacing public recognition, but on making outcomes intelligible and actionable for employers with limited administrative resources.

Lastly, healthcare employers note that recognition decisions are frequently framed in **deficit-based terms**, focusing on missing elements or gaps relative to national curricula, without clearly indicating what applicants are already qualified to do.[551] Hospitals argue that more **positive, competence-visible outcomes**, for example, clearly identifying tasks that can be performed under supervision or during adaptation periods, would allow employers to deploy skills earlier and more effectively during integration, especially in contexts of acute staff shortages.[552]

Annex 10.5.7 Labour market impacts: deskilling, overqualification and exploitation risks

Stakeholder evidence consistently links shortcomings in recognition and validation systems for TCNs to **negative labour market outcomes**, notably deskilling, overqualification and heightened exploitation risks. These impacts are not presented as marginal side effects, but as structural consequences of delayed, uncertain or incomplete recognition pathways.[553]

Stakeholders highlight **high levels of structural overqualification**, with a large share of tertiary-educated TCNs working below their qualification level.[554] Prolonged periods of overqualification can lead to **long-term labour market penalties** (e.g. reduced career progression, earnings and effective skills utilisation over time) and **skills waste,** with significant social implications.[555] Non-recognition and partial recognition enable wage dumping and poor working conditions, as TCNs may be channelled into lower-paid roles despite possessing higher-level competences. From this perspective, recognition is not only a labour mobility instrument but also a protective mechanism, supporting equal treatment and preventing social dumping by ensuring that skills are matched with appropriate pay and conditions.[556]

Sector-specific evidence illustrates how the complexity of recognition processes contributes to deskilling and exclusion. A contribution from the domestic and homecare sector argues that complex and inconsistent recognition procedures push TCNs into **informal or semi-formal employment**, where skills are neither recognised nor protected.[557] Similarly, stakeholders in the healthcare sector, despite upholding the need to maintain safeguards for the patients' health, acknowledge that existing systems are often excessively rigid,

[549] Contribution to the call for evidence (CONFLAVORO).
[550] Contribution to the call for evidence (CONFLAVORO).
[551] Contribution to the call for evidence (DKG).
[552] Contribution to the call for evidence (DKG).
[553] Contribution to the call for evidence (IOM; ETUC).
[554] Contribution to the call for evidence (IOM; ETUC; EICBI).
[555] Contribution to the call for evidence (IOM; ETUC).
[556] Contribution to the call for evidence (ETUC).
[557] Contribution to the call for evidence (EFFE).

leading to prolonged exclusion of qualified professionals and underuse of skills in sectors facing acute shortages.[558]

In order to reconcile safeguards with accessibility, professional bodies and competent authorities argue that better use of **existing EU quality assurance frameworks** could help.[559] Several actors support the development of approved or pre-assessed lists of third-country qualifications or providers for shortage professions, as a way to reduce repeated assessments while maintaining quality and safety standards.[560] For example, one actor proposes using the ESEVT accreditation system to pre-assess third-country veterinary education providers, avoiding duplication of national assessments while preserving robust quality controls.[561]

Annex 10.5.8 Link between recognition and migration or residence status (high stakes for third-country nationals)

Stakeholder evidence highlights that shortcomings in recognition procedures for TCNs are **magnified by their direct interaction with migration, visa and residence frameworks**, making recognition outcomes unusually high-stakes. Unlike EU nationals, TCNs' access to employment, mobility and legal stay is often **contingent on recognition decisions**, meaning that delays, uncertainty or negative outcomes can have immediate consequences for both labour market participation and residence security, creating challenges for both TCNs and employers.[562]

In fact, procedural complexity and fragmentation affect mobility **at entry as well as during residence.** In this context, uncertainty and delays deter talent from applying for EU jobs and complicate employer planning, as recognition timelines are difficult to align with migration procedures.[563]

For what concerns challenges for TCNs, when skills are not recognised, or recognition is delayed, they may become **structurally dependent on a single employer or intermediary** to maintain their residence status.[564] Recognition outcomes often determine whether a worker qualifies for a particular permit, can renew residence, or can change employer. From this perspective, recognition frameworks for TCNs cannot be considered in isolation from migration status. Fragmented or rigid recognition processes can heighten TCNs vulnerabilities as they can lock TCNs into precarious employment situations, excluding them from skilled occupations even where labour demand exists and heightening exploitation risk.[565]

Hurdles are also faced by employers and sectoral stakeholders for whom misalignment between recognition timelines and migration procedures frequently results in **prolonged inactivity**.[566] Hospitals and other employers report situations where qualified professionals are legally present but unable to work, or unable to work at their skill level, while waiting for

[558] Contribution to the call for evidence (EFN, DKG).
[559] Contribution to the call for evidence (CCBC; ECCVT; DKG).
[560] Contribution to the call for evidence (CCBC; ECCVT; DKG).
[561] Contribution to the call for evidence (ECCVT).
[562] Contribution to the call for evidence (IOM; Fragomen).
[563] Contribution to the call for evidence (IOM; Fragomen).
[564] Contribution to the call for evidence (ETUC).
[565] Contribution to the call for evidence (ETUC, DGB; EICBI; Fragomen).
[566] Contribution to the call for evidence (DKG; CCBC).

recognition decisions required to activate or maintain their work permit.[567] This creates inefficiencies for employers and lost income and experience for TCNs.

Annex 10.5.9 EU-level action: what stakeholders concretely ask for (procedural standards, cooperation, governance and safeguards)

Across contributions, stakeholders converge on a **clear demand for stronger and more targeted EU-level action** to address the structural barriers faced by TCNs in recognition and validation systems. While respecting subsidiarity and Member State competence over qualification standards, most actors argue that EU intervention is essential to overcome fragmentation, ensure interoperability and define minimum procedural guarantees for TCNs.[568]
Recommendations and proposals advanced in the contributions include:

- the establishment of **EU-wide procedural standards** for recognition of third-country qualifications. This includes common parameters covering transparent documentation requirements, interoperable and reusable assessment results, appeal mechanisms, integration of RPL pathways, and safeguards against discrimination or bias. These standards are explicitly framed as procedural, rather than substantive, rules, intended to improve predictability and fairness without harmonising national qualification standards.[569]
- **Common procedural rules** , **including binding or clearly defined maximum time limits**, **clearer sequencing of procedural steps** and **user-friendly guidance for applicants and employers**. Stakeholder support procedural simplification through document clarity, maximum timelines, digitalisation and transparency of criteria, while stressing that such simplification must coexist with **rigorous substantive equivalence assessment**, especially in regulated activities such as teaching or professions involving vulnerable groups.[570] These could also include options for **pre-arrival verification**, allowing parts of the recognition process to be completed before entry, while maintaining national competence over final decisions. [571]
- Robust authenticity and fraud-prevention checks.
- A more flexible, **staged or "progressive" recognition models** at EU level, allowing labour market insertion while recognition procedures are ongoing, through mechanisms such as provisional authorisation, supervised practice or tutoring, with completion of procedures in parallel.[572]
- **EU-level lists of pre-assessed qualifications or institutions** for priority professions, aimed at reducing duplication and accelerating access while maintaining oversight.[573]
- **Enhanced digitalisation and usability**. [574]

[567] Contribution to the call for evidence (DKG; CCBC).
[568] Contribution to the call for evidence (IOM; EFN; ECCVT; Danish Employers; CONFLAVORO).
[569] Contribution to the call for evidence (IOM).
[570] Contribution to the call for evidence (COLEF; Confederation of Danish Employers).
[571] Contribution to the call for evidence (Confederation of Danish Employers)
[572] Contribution to the call for evidence (CONFLAVORO)
[573] Contribution to the call for evidence (CONFLAVORO)
[574] Contribution to the call for evidence (COLEF; BDA)

- **Removal formal recognition requirements linked to immigration** when unnecessary, particularly for non-regulated professions where residence law may impose recognition obligations that are not strictly required for labour market functioning (BDA).[575]
- At the **governance level**, stakeholders emphasise the need for **EU coordination rather than over-legislation**, support stronger coordination, data sharing and exchange of practices between competent authorities rather than rigid EU rules.[576]
- In regulated sectors, EU action must be **evidence-based and proportionate**. Several actors warn against broad EU-level "automatic recognition" as a general solution, citing safety, liability and the diversity of vocational education and training systems, and raising ethical concerns around third-country recruitment and potential brain drain.[577]
- Regulated-sector stakeholders support **targeted EU mechanisms** that build on existing **QA frameworks and reinforce them**.[578] For example, using the ESEVT accreditation system to pre-assess third-country veterinary education providers, thereby avoiding repeated national assessments while maintaining robust safeguards and public trust (ECCVT).[579]

Overall, stakeholders do not call for harmonisation of qualification standards, but for **EU-level procedural convergence, coordination and trust-building**. Concretely, they ask for minimum procedural guarantees (timelines, clarity, appeals), interoperable and reusable assessments, stronger cooperation between authorities, targeted EU reference tools for priority professions, and safeguards ensuring quality, equal treatment and proportionality. EU action is therefore seen as essential to improve predictability and fairness for TCNs, while preserving Member State discretion and public interest protections.

[575] Contribution to the call for evidence (BDA)
[576] Contribution to the call for evidence (ZDH; ONCD; AEBR/CB labour mobility)
[577] Contribution to the call for evidence (Europe ON; GCP)
[578] Contribution to the call for evidence (ECCVT; Osteopathy Europe)
[579] Contribution to the call for evidence (ECCVT)

Annex 11. Further considerations on the need for EU action

The EU is experiencing persistent **skills shortages across a wide range of sectors and skill levels.** The demand for qualified workers cannot be met solely through the training and upskilling of EU nationals. As a result, the EU must both **attract skilled migrants from third countries** and **improve the integration of TCNs already residing within the Union**.

Significant shortages occur in regulated occupations, particularly in construction, healthcare, and information and communications technology (ICT). These shortages affect all skill levels and are expected to worsen in the coming years due to demographic changes and job creation, especially in areas with high replacement demand resulting from retirements.[580] In 2023 the EU identified **42 shortage priority occupations** (across more than 10 sectors) to fill by attracting talent from third countries (see Table 36 - EU priority professions below).[581] These priority professions reflect a mix of regulated and unregulated professions.

Importantly, skills and labour shortages in the EU should be understood as a **broad, system-level challenge**, affecting multiple sectors and skill levels and driven by structural forces rather than a narrow list of occupations. In particular, **demographic ageing and a shrinking working-age population** increase replacement demand as large cohorts retire, while the green and digital transitions and changing production models create additional pressures on hiring and skills needs across the economy.[582] This helps explain why shortages are reported not only in high-skilled professions, but also in many medium- and lower-skilled roles, and why they often persist over time in essential sectors such as healthcare, construction, hospitality and transport.[583] The EU has therefore stressed that demand for qualified workers cannot be met solely through training and upskilling of EU nationals, and that improving the attraction and labour-market integration of third-country nationals (TCNs) is part of the policy mix to sustain competitiveness and public services.[584]

For TCNs holding non-EU qualifications, access to such occupations is often conditional on successfully completing a formal qualification recognition process, which is generally a cumbersome and time-consuming endeavour, discouraging many potential applicants. TCNs play a vital role in the EU labour market. In 2024, 13.8 million non-EU citizens were employed across the EU, representing 6.5% of the working-age population.[585] These individuals fill critical roles in sectors facing acute shortages, including healthcare, long-term care, ICT, construction, and transport. In 2023, over 3.7 million first residence permits for

[580] European Commission (2023) 'Communication on Skills and Talent Mobility COM(2023) 715 final'. Available at: https://commission.europa.eu/document/download/b8c2d90f-17b1-4a10-b91c-4aa536cd2103_en?filename=COM_2023_715_1_EN.pdf

[581] Employment and Social Developments in Europe: Addressing labour shortages and skills gaps in the EU (2023) https://employment-social-affairs.ec.europa.eu/employment-and-social-developments-europe-addressing-labour-shortages-and-skills-gaps-eu-2023_en

[582] Employment and Social Developments in Europe: Addressing labour shortages and skills gaps in the EU (2023) https://employment-social-affairs.ec.europa.eu/employment-and-social-developments-europe-addressing-labour-shortages-and-skills-gaps-eu-2023_en

[583] Employment and Social Developments in Europe: Addressing labour shortages and skills gaps in the EU (2023) https://employment-social-affairs.ec.europa.eu/employment-and-social-developments-europe-addressing-labour-shortages-and-skills-gaps-eu-2023_en

[584] Mario Draghi (2024). *A competitiveness strategy for Europe*. Available at: https://commission.europa.eu/topics/eu-competitiveness/draghireport_en#:~:text=Read%20Mario%20Draghi%27s%20report%20on%20the%20future%20of,on%20how%20Europe%20can%20boost%20its%20economic%20growth.

[585] EUROSTAT (2025) 'Population by sex, age, citizenship, labour status and NUTS 2 region'. Available at: https://doi.org/10.2908/LFST_R_LFSD2PWN; Internal source gathering evidence on the recognition of qualifications of TCNs provided by DG EMPL.

employment purposes were issued by EU Member States, further highlighting the importance of TCNs to the EU economy.[586]

Table 36 - EU priority professions

Sector	Occupations
Healthcare	Generalist medical practitioners, Specialist medical practitioners, Nursing professionals, Nursing associate professionals, Health care assistants
Construction	Civil engineers, Bricklayers and related workers, Concrete placers and finishers, Carpenters and joiners, Roofers, Plasterers, Plumbers and pipe fitters, Air conditioning and refrigeration mechanics, Building and related electricians, Electrical mechanics and fitters
Transport	Bus and tram drivers, Heavy truck and lorry drivers, Motor vehicle mechanics and repairers
IT & Digital	Systems analysts, Software developers, Web and multimedia developers, Applications programmers, Software and applications developers and analysts not elsewhere classified
Engineering	Electrical engineers, Mechanical engineers, Industrial and production engineers, Chemical engineers, Mechanical engineering technicians, Electrical engineering technicians, Physical and engineering science technicians not elsewhere classified
Green Jobs	Environmental engineers, Environmental protection professionals
Hospitality	Cooks, Waiters, Butchers, fishmongers and related food preparers
Manufacturing	Welders and flame cutters, Sheet-metal workers, Structural-metal preparers and erectors, Metal working machine tool setters and operators
Agriculture	Agricultural and industrial machinery mechanics and repairers
Others	Accountants, Cleaners and helpers in offices, hotels and other establishments

Source: Author's elaboration based on European Commission, 2023[587]

The imperative to enhance the regional attractiveness for TCNs amidst a global competition for international talent has driven several EU-wide initiatives, such as revisions to legal migration instruments, the establishment of Talent Partnerships, and proposals for an EU Talent Pool. The **revised Blue Card Directive**[588], for example, has lowered admission salary thresholds for highly skilled workers, expanded eligibility to include certain categories of professional experience, and improved intra-EU mobility rights for Blue Card holders. Intra-EU mobility is significant not only for TCNs wishing to move from one EU Member State to another, but also for those who intend to commute across borders for work. The **Single Permit Directive**[589] was also revised in 2024. The Directive establishes a simplified application procedure for one single permit for both the right to work and reside in the EU. The revision simplifies and speeds up the application procedures for the single

[586] Eurostat, Residence permits - statistics on first permits issued during the year: https://ec.europa.eu/eurostat/statistics-explained/index.php?oldid=456573#:~:text=In%202023,%20more%20than%203.7%C2%A0million

[587] European Commission (2023). Employment and Social Developments in Europe: Addressing labour shortages and skills gaps in the EU. Available at: https://c/Users/XN349YQ/OneDrive%20-%20EY/Desktop/employment%20and%20social%20developments%20in%20europe%202023-KEBD23002ENN.pdf

[588] EU Parliament (2021). 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. Available at: http://data.europa.eu/eli/dir/2021/1883/oj

[589] European Parliament (2024). 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 (recast). Available at: https://eur-lex.europa.eu/eli/dir/2024/1233/oj/eng.

permit and ensures enhanced protection to non-EU workers. The **EU Talent Pool**[590] will be the first EU-wide online platform to facilitate job matching between jobseekers from third countries and EU employers. However, these measures do not address national procedures for recognition of professional qualifications and validation of skills. The EU Talent Pool will only facilitate access to information on such procedures by providing this information on the online platform.

Despite these efforts, the EU continues to face challenges in attracting the skilled workforce needed to sustain and boost regional competitiveness.

A significant barrier to enhancing EU attractiveness, as well as to the effective integration of TCNs, is the **fragmented and complex landscape of national systems for the recognition of qualifications and validation of skills** (see section 3). TCNs may be required to have their qualifications recognised for various purposes, such as accessing regulated professions or meeting prerequisites for legal migration. Moreover, recognition may also be beneficial for integration purposes, as it allows individuals to access their profession at the appropriate level and reduces the risk of overqualification.[591]

Navigating these, often opaque, national recognition and validation frameworks can be **highly cumbersome, time-consuming and costly for both TCNs and employers seeking to hire talent from outside of the EU**. Procedures often involve multiple authorities and extensive documentation requirements, resulting in limited transparency and lengthy waiting periods that delay labour market access. The fragmented landscape of recognition procedures across the EU creates significant “information costs” for TCNs. This lack of clarity regarding which specific pathway applies to their circumstances often acts as a deterrent, discouraging skilled talent from viewing the Single Market as a viable career destination. According to a recent evidence gathering report commissioned by DG EMPL, based on European Labor Force Data (EU LFS 2021), for one out of three TCNs professionals residing in the EU and holding TCQs in regulated occupations, the complexity and the cost of the recognition procedures and their lack of transparency were major deterrents to seek recognition and access to professional practice commensurate to their qualifications.[592] According to an earlier survey, 21% of TCNs identify recognition procedures as the main obstacle to securing employment that matches their skills.[593]

Employers, particularly small and medium-sized enterprises (SMEs), are also deterred by the administrative burden and uncertainty associated with qualification recognition and validation of skills. Although a majority of SMEs[594] report skills shortages,

[590] European Commission (2023). COMMISSION STAFF WORKING DOCUMENT SUBSIDIARITY GRID Accompanying the document Proposal for a Regulation of the European Parliament and of the Council establishing an EU Talent Pool. Available at: https://eur-lex.europa.eu/legal-content/IT/TXT/?uri=CELEX%3A52023SC0716.

[591] Margaras, V., & Eisele, K. (2023). Recognition of the qualifications of third-country nationals: Pre-legislative synthesis of national, regional and local positions on the European Commission's initiative (Briefing No. EPRS_BRI(2023)754594). European Parliamentary Research Service, European Parliament. Available at: https://www.europarl.europa.eu/RegData/etudes/BRIE/2023/754594/EPRS_BRI(2023)754594_EN.pdf

[592] Internal source gathering evidence on the recognition of qualifications of TCNs provided by DG EMPL).

[593] The cost of non-Europe in the area of legal migration, European Parliament, 2019: EPRS_STU(2019)631736_EN.pdf

[594] From 50 to 74% of SMEs that recruited non-EU workers, EU and Member States, (% of SMEs), Eurofound: https://www.eurofound.europa.eu/en/data-catalogue/smes-recruited-non-eu-workers-eu-and-member-states-smes

594 OECD(2025), International Migration Outlook 2025, OECD Publishing Paris

only 9% actively recruit outside the EU. International recruitment is hindered, among other things, by complex and fragmented recognition procedures and validation of skills. Notably, SMEs cited recognition of professional qualifications as one the specific difficulties they encounter when scaling operation across Member States.[595] Streamlining recognition procedures and validation of skills could enable businesses to access a broader pool of skilled workers more efficiently and with greater confidence.

In the global competition for talent, migration policies across Organisation for Economic Cooperation and Development (OECD) countries have been fine-tuned to facilitate the admission of skilled professionals, including, and particularly, those holding qualifications in regulated health occupations.[596] Moreover, countries such as Canada, Australia, Norway, and the United Kingdom (UK) have modernised their recognition systems **through fast-track schemes**, **automatic recognition of qualifications issued by trusted institutions**, and **expedited pathways to the labour market for skilled workers**.[597] In some EU Member States, promising innovations such as the accelerated qualification recognition procedures for nurses from India and the Philippines (IE) and the training of TCNs health workers in their country of origin (DE), as well as those piloted in the context of the COVID-19 emergency (AT, DE, IT, PL) and, more recently, in response to large-scale displacement of skilled professionals from Ukraine (EE, LT, LV, PL), have demonstrated unprecedented momentum in streamlining qualification recognition policies and processes.[598] Yet, so far, these efforts have largely been ad hoc, while, in general, national recognition systems across the EU still suffer from complexities and fragmentations which are ill-suited to serve the international portability of skills in today's globalised economies.

Improving qualification recognition and skills validation procedures offers tangible potential to enhance the EU's appeal to skilled workers. The OECD talent attractiveness indicator[599] highlights the EU's collective struggle to compete for top global talent, with only Sweden ranking among the five most attractive countries for highly skilled workers. While overall attractiveness is influenced by broader economic and social factors, **barriers to qualification recognition, which are primarily administrative and legal, can be addressed by targeted policy interventions.**

The fragmented and complex nature of national recognition systems also has macroeconomic consequences, contributing to **overqualification**, **skills mismatches**, and **employment gaps**, which in turn hinder the effective integration of TCNs. In 2023, nearly 39.4% of tertiary-educated TCNs in the EU were employed in positions below their qualification level, compared to 20.8% of nationals.[600] TCNs also have a lower employment rate (63%) compared to EU nationals (75%).[601] In particular, the unemployment among TCNs is exacerbated by the failure in recognising qualifications: the unemployment rate

[595] Lates Eurobarometer survey: https://futurium.ec.europa.eu/en/border-focal-point-network/news/latest-eurobarometer-survey-reveals-key-barriers-cross-border-growth-smes
596 OECD(2025), International Migration Outlook 2025, OECD Publishing Paris
[597] OECD(2025), International Migration Outlook 2025, OECD Publishing Paris
[598] Internal source gathering evidence on the recognition of qualifications of TCNs provided by DG EMPL
[599] OECD. Available at: Talent Attractiveness 2023, OECD
[600] Migrant integration statistics - over-qualification, Eurostat: https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Migrant_integration_statistics_-_over-qualification
[601] Annual report on intra-EU labour mobility, Edition 2024, DG Employment, Social Affairs and Inclusion, European Commission

among TCNs with recognised qualifications is 16%, which is lower compared to 22% for those with unrecognised qualifications.[602] In a similar manner, barriers to the recognition of qualifications significantly impact the **participation of tertiary-educated persons in the labour market**. While at medium education levels, participation rates for TCNs with recognised qualifications (79%) are only slightly higher than those with unrecognised qualifications (77%), the participation rate for tertiary-educated TCNs with recognised qualifications (81%) is markedly higher than for those with unrecognised qualifications (74%).[603] These disparities are particularly pronounced in sectors such as **healthcare**, **construction**, **ICT**, and **education**, where staffing shortages threaten public services and future growth.

Recognising these challenges, the 2024-2029 Political Guidelines[604] announced **support for Member States and companies in legal migration based on skills needs, with a commitment to harmonise rules on the recognition of qualifications**. Recent initiatives, such as Recommendation (EU) 2022/554[605] on the recognition of qualifications for people fleeing Russia's invasion of Ukraine and Recommendation (EU) 2023/2611[606] on the recognition of qualifications of TCNs, call on Member States to scale up efforts to facilitate recognition, speeding up and simplifying procedures, and attracting talent to address labour market gaps.

Therefore, addressing the fragmentation and complexity of national qualification recognition and validation systems is essential for the EU to fully leverage global talent, close skills gaps, address integration failures, and strengthen regional competitiveness. Targeted reforms to streamline and harmonise recognition and validation procedures will benefit skilled migrants (both residents and candidates), employers, and the wider public by supporting economic growth and the resilience of key sectors across the Union.

[602] Internal source gathering evidence on the recognition of qualifications of TCNs provided by DG EMPL
[603] Internal source gathering evidence on the recognition of qualifications of TCNs provided by DG EMPL
[604] European Commission (2024). Political Guidelines for the Next European Commission 2024–2029. Publications Office of the European Union. Available at: https://commission.europa.eu/document/download/e6cd4328-673c-4e7a-8683-f63ffb2cf648_en?filename=Political%20Guidelines%202024-2029_EN.pdf
[605] Commission Recommendation (EU) 2022/554 of 5 April 2022 on the recognition of qualifications for people fleeing Russia's invasion of Ukraine. Available at: http://data.europa.eu/eli/reco/2022/554/oj
[606] COMMISSION RECOMMENDATION (EU) 2023/2611 of 15 November 2023 on the recognition of qualifications of third-country nationals. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32023H2611

Annex 12. Further details on policy options

Annex 12.1 List of discarded policy measures

In line with the Better Regulation Guidelines, a long list of policy measures was prepared following the problem assessment, the assessment of the EU's right to act and the identification of relevant policy objectives.

The long list of measures was subject to a screening in order to identify the most effective and viable measure, which were subsequently clustered into two comprehensive policy options (in addition to the status quo / baseline policy option).

The screening was based on effectiveness and feasibility criteria. The findings of the assessment are presented in the table below.

Table 37 - List of discarded measures

List of measures	Rational for discarding the measure
Extend Directive 2005/36/EC to TCNs	Legal and political constraints due to the current EU law distinction between EU citizens and third-country nationals.
Extend the use of IMI to TCQs cases of regulated professions, enabling structured exchanges on document authenticity checks and recognition practices.	Discarded due to very limited effectiveness. Indeed, in the absence of harmonised regulations, collaboration remains sporadic and narrowly focused, making it difficult to achieve consistent or reliable results on a larger scale. While improved cooperation mechanisms can facilitate individual cases, they do not fundamentally alter existing national processes.
Leverage existing trade instruments, including mutual recognition agreements and provisions in free trade agreements on transparency, timelines and procedural fairness, to support trust-based recognition.	Discarded due to a combination of limited effectiveness and feasibility. Indeed, Trade-based recognition mechanisms take time to negotiate, may be limited to one country, and may be articulated in open or high-level terms making them unsuitable for addressing EU-wide labour market needs or systemic recognition challenges.
Automated pre-screening of TCNs qualification documents: applicants' access to a checklist of required documents and conducts an automated verification of completeness of documents submitted through a based interface within the digital platform.	Evidence collected during the study showcased discrepancies between the documents and requirements indicated online and those required in practice. Therefore, there is a risk to invest on the establishment of a database that might turn to be limitedly effective.
Reform document authentication by accepting simple copies where risk is low, creating trusted partnerships with origin institutions.	Discarded due to limited feasibility. Indeed, the level of trust on the quality of certificate issued in third country is already quite low and requiring Member States to accept simple copies would further reduce it.

List of measures	Rational for discarding the measure
Common procedural rules for validation of skills	Discarded because any EU intervention establishing procedural rules specifically for TCNs would risk creating a validation framework that does not exist for EU citizens. There is no comparable validation system coordinated or available at EU level for EU nationals, whose access to validation remains entirely a matter of national and local provision. Establishing binding procedural entitlements for TCNs would therefore raise equal treatment concerns and could not be justified as a proportionate use of EU competence. Secondly, while recognition follows a comparable logic across Member States of assessing qualifications against defined standards and arriving at a formal decision, validation is inherently local, context-sensitive and purpose-driven. The 4 stages of validation are designed to capture individual skills and experiences in a tailored way and are delivered across an enormous variety of settings each with their own methodologies. Common procedural rules would either require a degree of harmonisation that fundamentally conflicts with the nature of validation, applying structured logic onto processes that are often deliberately informal and adaptable.

Source: author's elaboration

Annex 12.2 Baseline and retained POs

Annex 12.2.1 PO 0: baseline

At EU level, the main horizontal framework for the recognition of qualifications held by TCNs is provided by Commission Recommendation (EU) 2023/2611 of 15 November 2023 on the recognition of qualifications of third-country nationals. The Recommendation was adopted as part of the Skills and Talent Mobility Package, alongside a Communication, a proposal for the EU Talent Pool and measures to promote learner mobility. It encouraged Member States to simplify procedures, improve transparency, promote early and proportionate assessment, and better take into account skills acquired outside formal education systems. The Recommendation built on an earlier Commission Recommendation of 28 March 2022 on the recognition of qualifications for people fleeing Russia's invasion of Ukraine which called on Member States to rapidly facilitate access to employment and education for displaced Ukrainians holding TCQs. That instrument demonstrated that faster, more proportionate approaches to recognition were achievable when there was sufficient political will. It provided practical lessons on fast-tracking, on flexibility in documentation requirements, and on the value of coordinated national responses that subsequently informed the design of the 2023 Recommendation.

The 2023 Recommendation served as an important lever for dialogue and for bringing the issue to the fore at EU level. As a non-legislative instrument, it does not create enforceable rights or obligations and relies on voluntary implementation. Its value lays in creating a shared reference point for discussion and catalysing a structured programme of engagement between the Commission, Member States and stakeholders. Between April and June 2024, the Commission hosted a series of three thematic webinars bringing

together actors from the fields of recognition, migration and employment. These generated significant interest and participation, revealing both the scale of activity across Member States and the appetite for mutual learning. The webinars surfaced consistent themes: the availability and quality of information for third-country nationals as a determinant of whether recognition is sought at all; the resource-intensive and often duplicative nature of verification and authentication processes; and the particular pressures in the healthcare sector where shortages are most acute. They also demonstrated that promising practices exist but that these remain nationally siloed and difficult to scale or transfer.

The Commission also conducted bilateral meetings with 20 Member States in December 2024 and January 2025. These exchanges confirmed the systemic nature of the challenges in a way that goes beyond what the Recommendation alone could address. Member States consistently reported fragmentation of competences across ministries, regions, professional bodies and migration authorities; difficulties in verifying the authenticity of TCQs and building trust in unfamiliar systems; significant variation in processing times, including within the same country in more decentralised systems depending on region; and a lack of shared data and tools. Critically, the bilateral meetings revealed a clear demand for greater EU-level coordination, including shared qualification databases, mutual recognition of assessments for common countries of origin, and investment in digital tools. Structural challenges emerged consistently, namely the disconnect between recognition systems and labour migration procedures, the duplication of assessments, and the inconsistency of outcomes, could not be resolved through the Recommendation alone.

While the Recommendation has supported the identification and dissemination of good practices and created a platform for cooperation, its capacity to address the underlying challenges remains limited. It focuses primarily on improving procedures within specific settings, including access to regulated professions, migration procedures or further learning, whereas the core issue is more systemic: recognition and validation systems often operate in parallel and do not sufficiently interact with each other or with labour migration systems. The provisions it makes regarding labour migration are illustrative of this constraint. The misalignment between recognition requirements and migration procedures and timelines, where a third-country national may be required to complete recognition before or after obtaining a residence permit under procedures administered by entirely separate authorities operating under different legal frameworks and timescales, is precisely the kind of structural problem that a non-binding Recommendation, however well-designed, cannot resolve. Moreover, it has to be noted that, there is no visa option for recognition candidates to enter the country to undertake the recognition requirements. The bilateral meetings and webinars did not merely confirm this diagnosis: they demonstrated that Member States themselves recognise it and are looking to the EU level for more effective tools.

The EU legal migration framework and talent attraction initiatives

Over the past two decades, the EU has developed a substantial legal framework for the entry and residence of third-country nationals. This covers labour migration for highly qualified workers, seasonal workers and intra-corporate transferees, as well as admission conditions for students and researchers, the right to family reunification, and the conditions

for obtaining long-term residence. A single permit combining the right to work and reside has also been introduced for workers admitted under national schemes. More recently, the EU has complemented this framework with a range of initiatives oriented towards talent attraction and the facilitation of legal pathways: Talent Partnerships with key partner countries, a Pilot Legal Gateway to streamline pre-arrival processes, the EU Visa Strategy, and a Recommendation on attracting talent for innovation. The Asylum and Migration Pact provides the broader strategic architecture within which these instruments sit. The future EU Talent Pool will enable improvements to international recruitment and access to information. By centralising job matching and providing guidance on procedures, the Talent Pool can support both employers and third-country nationals in navigating national systems.

Taken together, these instruments reflect a consistent political ambition to make the EU a more attractive and accessible destination for skilled workers from third countries. They establish pathways for entry and residence, improve matching between employers and potential recruits, and in some cases include equal treatment provisions that extend certain rights, including in relation to qualifications, to third-country nationals admitted under their scope. However, none of these instruments addresses the organisation, design or functioning of recognition of qualifications and validation of skills systems. They neither create obligations on Member States to simplify or coordinate recognition procedures, nor do they contribute to resolving the structural misalignment between migration systems and recognition frameworks. For third-country nationals arriving through these pathways, the barriers documented in this Impact Assessment, including fragmentation, administrative burden, long processing times and limited transparency, remain fully in place.

Other EU-level instruments

Directive 2005/36/EC (‘the Professional Qualifications Directive’) acts as a legal framework for the recognition of qualifications for access to regulated professions, but its scope is limited to EU nationals holding qualifications acquired in the EU. Third-country nationals and EU nationals holding non-EU qualifications only benefit indirectly from this framework in certain limited scenarios through equal treatment provisions in EU migration instruments. Recognition of qualifications for access to regulated professions by third-country nationals therefore remains largely governed by national rules and procedures.

EU trade policy provides an additional framework for recognition of qualifications with third countries. Through mutual recognition agreements (MRAs), whether standalone or embedded in free trade agreements, the EU and third countries set out dedicated recognition processes for specific sectors allowing their professionals to export their skills and engage in the market of the other Party. MRAs are reciprocal in nature, so that not only TCNs can exercise their profession in the EU but allowing EU nationals to do so as well in third countries. While interest in concluding MRAs has recently increased, MRAs between the EU, or its member states, and third countries remain rare in practice, and particularly so with developing countries which are a large source of foreign professionals to the EU, and their overall impact on addressing large-scale labour market needs is limited.

EU transparency tools, including the European Qualifications Framework (EQF), contribute to improving the comparability and understanding of qualifications by providing a common reference framework. However, qualifications frameworks and meta frameworks do not replace the need for detailed assessment of qualifications, nor do they resolve underlying issues of fragmentation and duplication across systems.

Separately, the validation of skills acquired through non-formal and informal learning is supported at EU level by the 2012 Council Recommendation on validation. While this framework provides important guidance for making skills visible and supporting labour market integration, its implementation varies significantly across Member States and its use in the context of third-country nationals remains uneven.

Annex 12.2.2 PO 1: Building on existing mechanisms to improve recognition and validation

Driver	Elements of the option
SO1. Streamlining recognition and validation processes between and within Member States	
1.1 Different recognition and validation procedures for the same qualifications across Member States	**B1**. Launch structured mutual-learning programmes and comparative studies on national recognition and validation practices for third-country nationals. The Commission to launch mutual learning programmes with the support of GoC and studies aimed at providing a comparative overview on the national recognition and validation practices in places for TCNs. **B2.** Guidelines on EU minimum training requirements for sectoral professions to provide common guidance for Member States on the recognition of qualifications of TCNs in these professions. **B3**. Develop common guidelines, templates and checklists for recognition and validation procedures to support consistency in administrative practices. For both B2 and B3 The Commission to draft guidelines on how CAs should structure and present information on regulated professions, required documents, procedures, timelines, fees, and appeal rights. It establishes a common template to support clarity and consistency across Member State portals. A voluntary peer review mechanism enables authorities to benchmark their portals and adopt aligned practices. No formal **enforcement** mechanisms would apply, given the non-binding nature of the measure. Compliance would be promoted through transparency, benchmarking and reputational incentives within the GoC. **B4.** Promote benchmarking and capacity building activities on the validation of skills of TCNs across the EU, with the support of CEDEFOP. Cedefop to monitor progress towards the implementation of the European guidelines for the validation of formal and non-formal skills by collecting comparable data on national progress towards the implementation of the guidelines in order to identify best practices, challenges and bottlenecks. These can be discussed during capacity building activities that can be facilitated by CEDEFOP through peer learning meetings and development of toolkits to prompt a harmonised approach across Member States
1.2 Duplication and inconsistencies of procedures within Member States	**B5**. Identify and disseminate best practices on streamlined and consistent recognition procedures across and within different national systems. The Commission to identify national best practices disseminate through the GoC meetings.
1.3 Lack of clear and accessible information for TCNs and employers	**B6.** Improve EU-level information provision for individuals and employers, including in the EU Talent Pool, including clear guidance on recognition requirements, documentation and processing times. The Commission issues guidance specifying how national authorities should display information in a user-friendly format through a single digital gateway. It establishes a harmonised layout integrating national content with EU-level tools

Driver	Elements of the option
	such as RegProf and related databases. The guidance provides common headings, navigation rules, and usability standards. Cooperation through dedicated GoC subgroups would support voluntary alignment of terminology, architecture and update cycles. **Progress** would be **monitored** through GoC discussions, qualitative assessments of alignment between EU and national sources, and feedback from users navigating between systems. **No enforcement applies** since alignment remains voluntary. **Continuous coordination** would be required. Complementary IT support and common glossaries would facilitate convergence.
SO2. Reduce legal and administrative complexity for recognition and validation of qualifications and skills of third country nationals	
2.1 Lengthy and untransparent processes with unclear deadlines	**B7.** Develop EU-level common guidance defining procedural steps and indicative maximum processing timelines Same approach as per B2 and B3.
2.2 Burdensome documentation and translation requirements	**B8.** Issue recommendations on proportionate documentation and translation requirements and facilitate exchange of best practices among Member States The Commission to tissue recommendation that similarly to the Code of Conduct available for the PQD detail clear principles and examples defining proportionate documentation, translation, and certification requirements. It provides a reference list distinguishing essential from non-essential documents. CAs are invited to align their practices with these proportionality standards.
2.3 High and unclear costs	**B9**. Issue guidelines (e.g.: a calculation formula) to determine reasonable fees for recognition processes. The Commission provides an EU formula and methodological guidance for determining reasonable and proportionate fees for recognition procedures. It outlines permissible cost components and presents examples of compliant fee structures. Member States use the guidelines to review or adjust their national fee-setting methods. Data collection on fees would be a key complementary action (on the side of the Commission) to help with later assessment.
SO3. Increase trust and understanding of qualifications and skills obtained in third countries	
3.1 Concerns over authenticity of documents issued in third countries	**B10.** Support use of fraud and authenticity checklists, digital or Artificial Intelligence (AI)-powered solutions, and reference sources for verification of institutions and documents. The Commission develops and launches EU-supported pilot to deploy AI tool that guide CAs through references sources for verification of institutions and documents. The AI tool provides standardised answers and directs users to the correct sources. The pilot generates a common model that Member States may adopt or adapt in the future. Pilots would be implemented with a limited number of volunteering Member States and professions, with national authorities responsible for validating content and accuracy. **B11**. Facilitate pre-departure support under Talent Partnerships, including upstream skills assessment and documentation preparation. Under Talent Partnerships, the Commission, together with participating Member States and relevant partners, should facilitate pre-departure support measures aimed at addressing skills-matching and qualification-recognition barriers faced by TCNs. These include, the identification and assessment of candidates' skills, qualifications and work experience, in line with labour-market needs identified by participating Member States. Such profiling should be complemented by targeted training and upskilling measures in the country of origin, including language training and, where relevant, sector-specific or bridging training, to enhance employability and readiness for EU labour markets. At the same time, the Commission should support, the provision of pre-screening of qualifications and documentation before

Driver	Elements of the option
	arrival, including preparatory checks and guidance on documentation requirements.
3.2 Insufficient knowledge about third-country educational and training structures, curricula, and standards	**B12** Undertaking additional comparisons of TCQs frameworks with the European Qualification Framework (EQF). The Commission to develop the methodology for additional comparisons of TCQs, namely, to develop and to update the criteria, procedures and templates used for comparing frameworks. The EQF Advisory Group would support the process with peer reviews and recommendations on the comparison frameworks **B13.** Facilitate information exchange on TCQs in co-operation with relevant EU groups (EQF, GoC). The Commission, in cooperation with relevant EU groups such as EQF should foster information exchanges across Member States on TCQs. For instance, during GoC meetings an information exchange session shall be introduced to present and discuss the "recognition outcomes" for the same qualifications across different Member States.
3.3 Doubts about the efficacy of quality assurance within third-country systems	B14. Support further ETF work to improve transparency, comparability and understanding of quality assurance of TCQs and credentials. The Commission should support and steer further ETF analytical work—building on its ongoing activities on the mapping of third-country qualification frameworks, the analysis of learning outcomes and the assessment of quality assurance arrangements and issuing institutions—to improve the transparency, comparability and usability of TCQs for recognition purposes.

Annex 12.2.3 PO 2: Common measures to streamline procedures

Driver	Elements of the option
SO1. Streamlining recognition and validation processes between and within Member States	
1.1 Different recognition and validation procedures for the same qualifications across Member States	**A1.** Establish common rules for procedures that national authorities shall follow when assessing skills and qualifications of third-country nationals. A specific Article of the new EU legislative initiative shall include common rules on: a minimum set of the type of documents that can be required to TCNs by national CAs (see A5); acceptance of other forms of proofs than original documents (e.g. digital copies), reduce or eliminate cases in which certified translation is required.
1.2 Duplication and inconsistencies of procedures within Member States	**A2.** Establish rules for Member States to organise and coordinate national systems for recognition and validation to prevent overlap and duplication between procedures for access to regulated professions and as part of labour migration processes. Through a specific Article of the new EU legislative initiative, Member States shall take the appropriate measures to identify situations in which an in-depth assessment of applications for recognition is not essential, especially in cases where the Member State has previously assessed the qualification for a particular profession (e.g. during migration processes). If the outcome of such a previous assessment was favourable, further in-depth assessment should not be necessary.
1.3 Lack of clear and accessible information for TCNs and employers	**A3.** Establish minimum mandatory information requirements that Member States must consistently provide to TCNs (applicable recognition regime, documentation, timelines, fees, appeal rights etc.). Require Member States to provide information to TCNs at minimum on recognition procedures, timelines, fees, compensation measures (if any) any other formal requirement needed to access a specific regulate profession.
SO2. Reduce legal and administrative complexity for recognition and validation of qualifications and skills of third country nationals	

Driver	Elements of the option
2.1 Lengthy and untransparent processes with unclear deadlines	**A4.** Establish clear procedural guarantees, including deadlines for acknowledgment of applications, issuing a substantiated decision, and right of appeal. The competent authority of the host Member State shall acknowledge receipt of the application within one month of receipt and inform the applicant of any missing document. The procedure for examining an application for authorisation to practise a regulated profession must be completed as quickly as possible and lead to a duly substantiated decision by the competent authority in the host Member State in any case within two months after the date on which the applicant's complete file was submitted.
2.2 Burdensome documentation and translation requirements	**A5** Establish a common set, along with a maximum number of documents that national authorities may require. Mandate Member States to ensure that only a maximum number of documents (e.g. diploma and certificates, academic transcripts, CVs and proof professional experiences, licenses and registration from the country of origin) are required. **A6**. Establish an obligation to accept documents in more than one language, including one language frequently used by migrants. Mandate Member States to accept documents provided by TCNs applicants in any of the EU official languages.
2.3 High and unclear costs	**A7**. Introduce common rules to establish fees (not exceeding the cost of the service provided) that national authorities can charge applicants for applications. Mandate Member States to establish reduce or eliminate costs, such as application fees, where possible. In case where such cost cannot be eliminated, they should exceed the cost of the service provided.
SO3. Increase trust and understanding of qualifications and skills obtained in third countries	
3.1 Concerns over authenticity of documents issued in third countries	**A8** Establish an EU-level service to carry out authenticity checks on evidence of formal qualifications issued in third countries to support Member State authorities in their assessment procedures. In case of doubts over the authenticity of documents a quick and efficient check shall be ensured towards the use digital tools such as the FRAUDOC - Guidelines on Diploma Mills and Document Fraud for Credential Evaluators.[607]
3.2 Insufficient knowledge about third-country educational and training structures, curricula, and standards	**A9.** Mandate Member States to develop interoperable national databases on the comparability of TCQs, with the possibility to issue comparability statements, so as to facilitate the sharing of information between Member States on their recognition decisions and further improving the transparency of recognition procedures. Mandate Member States to provide and update data on TCQs on EU database established by the Commission in line with similar initiatives, e.g. the Erasmus+ Q-entry project.[608]
3.3 Doubts about the efficacy of quality assurance within third-country systems	**A10** Allow Member States to apply compensation measures where there are justified doubts on the quality of the education and qualification system under which the formal qualification has been awarded. If there are justified doubts on the between the quality of the education and qualification system under which the formal qualification has been awarded. Member States should take the decision to impose any compensation measure

[607] FRAUDOC - CIMEA.

[608] This database covers Member States and non-EU countries and provides information on school-leaving qualifications giving access to higher education and it includes information on Ukrainian qualifications and can be used to support the recognition process for people enjoying temporary protection in the context of Commission Recommendation EU 2022/554.

Driver	Elements of the option
	as soon as possible and are encouraged to do so no later than a month after the applicant asks for recognition.

Annex 12.2.4 PO3: Common rules including automatic recognition for selected profession (building on Option 2)

Driver	Elements of the option
SO1. Streamlining recognition and validation processes between and within Member States	
1.1 Different recognition and validation procedures for the same qualifications across Member States	**A1.** Establish common rules for procedures that national authorities shall follow when assessing skills and qualifications of third-country nationals. + **A11.** Establish an EU framework for the automatic recognition of selected TCQs in regulated professions, based on a system of prior verification of learning programmes against EU standards This measure aims to establish an EU framework for the automatic recognition of selected TCQs in regulated professions, initially limited to the seven sectoral professions covered by the PQD —doctors, nurses responsible for general care, dental practitioners, veterinary surgeons, midwives, pharmacists and architects. Automatic recognition would be based on the prior verification of third-country learning programmes against EU minimum training requirements, with eligible programmes listed in a public EU register of verified third-country programmes established under measure B15 (see below). Where a qualification is obtained from a listed programme, CAs would be able to grant automatic recognition without a full case-by-case assessment.
1.2 Duplication and inconsistencies of procedures within Member States	**A2.** Establish rules for Member States to organise and coordinate national systems for recognition and validation to prevent overlap and duplication between procedures for access to regulated professions and as part of labour migration processes.
1.3 Lack of clear and accessible information for TCNs and employers	**A3.** Establish minimum mandatory information requirements that Member States must consistently provide to TCNs (applicable recognition regime, documentation, timelines, fees, appeal rights etc.). + **B15.** Create a public EU register of third-country learning programmes eligible for automatic recognition The Commission to create a register of third-country learning programmes including relevant information on how they compare to EU ones (for instance whether they match PQD minimum training standards in sectoral professions)
SO2. Reduce legal and administrative complexity for recognition and validation of qualifications and skills of third country nationals	
2.1 Lengthy and untransparent processes with unclear deadlines	**A4.** Establish clear procedural guarantees, including deadlines for acknowledgment of applications, issuing a substantiated decision, and right of appeal. + **A11.** Establish an EU framework for the automatic recognition of selected TCQs in regulated professions, based on a system of prior verification of learning programmes against EU standards

Driver	Elements of the option
2.2 Burdensome documentation and translation requirements	**A5** Establish a common set, along with a maximum number of documents that national authorities may require. **A6**. Establish an obligation to accept documents in more than one language, including one language frequently used by migrants.
2.3 High and unclear costs	**A7**. Introduce common rules to establish fees (not exceeding the cost of the service provided) that national authorities can charge applicants for applications.
SO3. Increase trust and understanding of qualifications and skills obtained in third countries	
3.1 Concerns over authenticity of documents issued in third countries	**A9.** Mandate Member States to develop interoperable national databases on the comparability of TCQs, with the possibility to issue comparability statements, so as to facilitate the sharing of information between Member States on their recognition decisions and further improving the transparency of recognition procedures. + **A12.** Require issuance of qualifications as verifiable digital credentials for automatic recognition to ensure authenticity The Commission introduces a legal obligation for Member States to accept and use digital credentials as valid evidence of qualifications for sectoral professions under the Directive. It requires credentials to be verifiable, trusted and interoperable across Member States. Member States would be responsible for issuing credentials, while complying with common EU requirements on verifiability, authenticity, trust and interoperability. The Commission would define the technical specifications and trust framework, ensuring compatibility with EU digital identity and data exchange infrastructures.
3.2 Insufficient knowledge about third-country educational and training structures, curricula, and standards	**B15.** Create a public EU register of third-country learning programmes eligible for automatic recognition
3.3 Doubts about the efficacy of quality assurance within third-country systems	**A10** Allow Member States to apply compensation measures where there are justified doubts on the quality of the education and qualification system under which the formal qualification has been awarded. + **A11.** Establish an EU framework for the automatic recognition of selected TCQs in regulated professions, based on a system of prior verification of learning programmes against EU standards

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Annex 14. Data collection tools

Annex 14.1 Questionnaire for strategic interviews

#	Questions
1.	In your view, why do you think the Commission should act now on the recognition of qualifications and validation of skills of third country nationals? What would be the added value of EU action in this area?
2.	What are the main EU initiatives that affect the recognition of qualifications and validation of skills of TCNs?
3.	Based on your perspective, what are the main challenges or risks in the recognition of qualifications and validation of skills of TCNs? What would be necessary to achieve the buy-in or acceptance of a policy proposal in this area?
4.	What are the implications for EU competitiveness of limited recognition of TCNs qualifications?
5.	What are the sectors most affected by labour shortages in the EU that might benefit from improvements on the recognition of TCNs qualification?
5.a.	For SANTE: Are there particular issues or stakeholders we should consider in the context of the healthcare sector in the EU when scoping the study for this action?
6.	Who are the target groups (e.g. legal migrants, refugees, displaced persons) of TCNs that face more difficulties in obtaining recognition of their qualifications and/or validation of their skills?
6.a.	For our upcoming consultation, it will be important to reach third country nationals? Do you have recommendations on networks or routes to reach third country nationals so that we can include their views?
7.	Are there any ongoing or upcoming legislative, policy, or institutional developments that should be taken into account during the studies?
8.	Which data sources, evaluations, or research (including internal or grey literature) should be included in the desk research phase of the studies?
9.	Who are the most relevant stakeholders, experts or networks we should consult at EU,r national level or international level?
10.	Could you elaborate on the links between legal migration processes (e.g. issuing of work permits) and recognition of qualifications?
11.	Are there any promising practices, case studies, or institutional experiences – either at EU, national or international level – that should be examined to inform the studies?
12.	Based on your perspective, do you have any suggestion to improve processes related to recognition of qualifications and validation of skills of TCNs?
13.	What steps should be taken to enable third-country nationals with permanent resident status to commute across borders for work?

Annex 14.2 Questionnaire for targeted interviews

Annex 14.2.1 NARIC centres and CAs

#	Guidelines
1	Can you introduce yourself and describe the role of your authority/organisation vis-à-vis the recognition of qualifications and the validation of skills of TCNs seeking to enter the EU?

#	Guidelines
2	In your view, why do you think the Commission should act now on the recognition of qualifications and validation of skills of third country nationals (TCNs)? What structural labour market issues (e.g., shortages, mismatch) impact TCNs' access to recognition and validation?
3	How does the professional recognition and validation process works in your country? What documents are required to proceed with the recognition/validation?
4	Is your system for validation and recognition burdensome and complex? Do you have clear deadlines, translation requirements or costs?
5	Do you cooperate closely with other authorities for the recognition of professional qualifications and validation of skills of TCNs? Do you cooperate with migration authorities in your country?
6	How are coordination and information sharing among EU Member States? Can you provide examples of good practices? How does the fragmentation of systems affect this cooperation?
7	How are coordination and information sharing between EU Member States and TCs? Can you provide examples of good practices?
8	What platforms or networks exist for exchanging qualification information with other EU Member States and third countries?
9	Are you aware of any difficulties encountered by TCNs in having their qualifications recognised and skills validate in your country?
10	What challenges exist regarding the availability of information on third-country qualification systems? Is there generally trust or mistrust toward qualifications issued in third countries?
11	Are there any fast-track solutions for specific professions, sectors, or countries? If so, how do they work?
12	Do you think it is feasible for the EU to introduce common rules to simplify recognition procedures for TCN qualifications, while also allowing automatic recognition for some selected professions? Why or why not?
13	What recommendations do you have to improve recognition and validation processes for TCNs in the EU?

Annex 14.2.2 TC authorities

#	Guidelines
1	Can you introduce yourself and describe the role of your authority/organisation vis-à-vis the recognition of qualifications and the validation of skills of TCNs seeking to enter the EU?
2	Are you aware of any difficulties encountered by Nationals from your country in having their qualifications recognised and skills validate in the EU?
3	How are coordination and information sharing between the EU Member States and with third countries? Can you provide examples of good practices?
4	Do Member States have a full understanding of qualifications and skills acquired in your country? Do they trust them? Or do you receive several checks for authenticity/ request for clarifications? (*ask this follow-up especially if they are ENIC-NARIC)*

#	Guidelines
5	What platforms or networks exist for exchanging qualification information with other EU Member States and third countries?
6	How accessible and known are recognition pathways for migrants/TCNs in your context? Are nationals from your country aware of the possible pathways and related procedures? Do they ask for request of clarifications/support? (*ask this follow-up especially if they are ENIC-NARIC)*
7	Based on your perspective, do TCNs encounter challenges retrieving information on EU systems and procedures for the recognition of qualifications and validation of skills in EU Member States?
8	What challenges exist regarding the availability of information on third-country qualification systems?
9	In your view, would introducing common rules to simplify procedures for recognition of qualifications and validation of skills across EU Member States be beneficial compared to the current fragmented system? To what extent would nationals from your country benefit, and in what ways?"
10	What recommendations do you have to improve cooperation between the EU Member States and Third Countries?

Annex 14.2.3 EU organisations of employers

#	Guidelines
1	Can you introduce yourself and describe the role of your authority/organisation vis-à-vis the recognition of qualifications and the validation of skills of TCNs seeking to enter the EU?
2	In your view, why do you think the Commission should act now on the recognition of qualifications and validation of skills of third country nationals (TCNs)? What structural labour market issues (e.g., shortages, mismatch) impact TCNs' access to recognition and validation?
3	What are the main procedures for TCNs to have skills validated in EU companies?
4	Are there differences in the validation process depending on the country of origin or profession?
5	What good practices exist in your experience for facilitating validation for TCNs? Are there any digital tools to facilitate the assessment?
6	What are the main challenges in validating skills and assessing qualifications within private companies or business sectors?
7	How are coordination and information sharing managed within and among EU Member States? Can you provide examples of good practices?
8	How are coordination and information sharing between the EU Member States and with third countries? Can you provide examples of good practices?
9	Do EU companies tend to trust qualifications obtained in TCs? Are there some good practices? Are you aware of any joint training centres in TCs?
10	What platforms or networks exist for exchanging qualification information with other EU Member States and third countries?
11	What challenges stem from this lack of coordination with other Member States and TCs? How could collaboration enhance the process of recognition/validation?
12	How aware are migrants/TCNs of the recognition pathways available in your context, and how accessible is the information about these pathways?

#	Guidelines
13	How aware are employers regarding the required steps to recruit a TCNs? Is the procedure burdensome and complex, or clear and transparent?
14	Are there any fast-track solutions for specific professions, sectors, or countries? If so, how do they work?
15	Do you think it would be helpful for employers if the EU introduced common rules to simplify recognition procedures for TCN qualifications, while also allowing automatic recognition for some selected professions? Why or why not?
16	What recommendations do you have to improve recognition and validation processes for TCNs in the EU?

Annex 14.2.4 EU professional organisations

#	Guidelines
1	Can you introduce yourself and describe the role of your authority/organisation vis-à-vis the recognition of qualifications and the validation of skills of TCNs seeking to enter the EU?
2	What are the main procedures for TCNs to have qualifications recognised and skills validated in the EU in your sector?
3	Is the system for validation and recognition burdensome and complex? Are there clear deadlines, translation requirements or costs?
4	Does the fragmentation of procedures across Member States create additional hurdles? If so, to what extent and in what ways?
5	Are there differences in the recognition of qualification and validation of skills processes depending on the country of origin or profession? Are there any good practices?
6	What good practices exist in your experience for facilitating recognition and validation for TCNs? Are there any digital tools to facilitate the assessment?
7	How are coordination and information sharing managed within and among EU Member States? Can you provide examples of good practices?
8	How are coordination and information sharing with third countries? Can you provide examples of good practices?
9	What challenges exist regarding the availability of information on third-country qualification systems? Is there generally trust or mistrust toward qualifications issued in third countries?
10	In your view, why do you think the Commission should act now on the recognition of qualifications and validation of skills of third country nationals (TCNs)? What will be the benefits of EU intervention in the field?
11	What platforms or networks exist for exchanging qualification information with other EU Member States and third countries?
12	How aware are migrants/TCNs of the recognition pathways available in your context, and how accessible is the information about these pathways?
13	What are the main challenges in validating skills and assessing qualifications within private companies or business sectors? (*Not to healthcare sector*)

#	Guidelines
14	Are there any fast-track solutions for specific professions, sectors, or countries? If so, how do they work?
15	Do you think it is feasible for the EU to introduce common rules to simplify recognition procedures for TCN qualifications, while also allowing automatic recognition for some selected professions? Why or why not?
16	What suggestions do you have to improve recognition and validation processes for TCNs in the EU?

Annex 14.2.5 HR departments

#	Guidelines
1	Can you introduce yourself and describe the role of your authority/organisation vis-à-vis the recognition of qualifications and the validation of skills of TCNs seeking to enter the EU?
2	What are the main procedures for TCNs to have skills validated in EU companies? And what is your role in the procedure of validation of skills?
3	Are there differences in the validation process depending on the country of origin or profession?
4	Are you aware of any EU initiative on validation of skills in the EU?
5	What good practices exist in your experience for facilitating validation for TCNs? Are there any digital tools to facilitate the assessment?
6	What are the main challenges in validating skills and assessing qualifications within private companies or business sectors?
7	What challenges exist regarding the availability of information on third-country qualification systems?
8	To what extent and how these challenges affect the possibility to hire TCNs?
9	To what extent and how these challenges affect the overall EU labour mobility as well as the EU capacity to address labour shortages ?
10	Do EU companies tend to trust qualifications obtained in TCs? Are there some good practices? Are you aware of any joint training centres in TCs?
11	How aware are employers regarding the required steps to recruit a TCNs? Is the procedure burdensome and complex, or clear and transparent?
12	Do you think the EU shall act to introduce common rules on validation of skills? If yes, what could be the benefits for companies and TCNs?
13	What suggestions do you have to improve recognition and validation processes for TCNs in the EU?

Annex 14.2.6 CSOs

#	Guidelines
1	Can you introduce yourself and describe the role of your authority/organisation vis-à-vis the recognition of qualifications and the validation of skills of TCNs seeking to enter the EU?

#	Guidelines
2	In your view, why do you think the Commission should act now on the recognition of qualifications and validation of skills of third country nationals (TCNs)? What structural labour market issues (e.g., shortages, mismatch) impact TCNs' access to recognition and validation?
3	Are there differences in the validation process depending on the country of origin or profession? What are the main challenges for refugees and undocumented migrants?
4	Are you aware of any difficulties encountered by TCNs in having their qualifications recognised and skills validate in the EU?
5	What are the main legal and policy barriers for TCNs to have their qualifications recognised /skills validated in the EU?
6	What administrative challenges (e.g., document or evidence provision) do TCNs face in recognition and validation processes?
7	What are the main challenges in validating skills and assessing qualifications within private companies or business sectors?
8	Does the fragmentation of the recognition and validation systems across Member States worsens challenges encountered by TCNs? If so, to what extent and in what ways?
9	Do lengthy and burdensome recognition and validation procedures create additional hurdles? Do these challenges affect certain groups disproportionately (e.g refugees or undocumented migrants)?
10	How aware are migrants/TCNs of the recognition pathways available in your context, and how accessible is the information about these pathways?
11	What challenges exist regarding the availability of information on third-country qualification systems? Is there generally trust or mistrust toward qualifications issued in third countries?
12	Are there any fast-track solutions for specific professions, sectors, or countries? If so, how do they work?
13	What recommendations do you have to improve recognition and validation processes for TCNs in the EU?

Annex 14.2.7 IOs

#	Guidelines
1	Can you introduce yourself and describe the role of your authority/organisation vis-à-vis the recognition of qualifications and the validation of skills of TCNs seeking to enter the EU?
2	Are you aware of any difficulties encountered by TCNs in having their qualifications recognised and skills validate in the EU? How do you support TCNs encountering such challenges?
3	What are the main legal and policy barriers for TCNs to have their qualifications recognised /skills validated in the EU?
4	What administrative challenges (e.g., document or evidence provision) do TCNs face in recognition and validation processes?
5	Does the fragmentation of the recognition and validation systems across Member States worsens challenges encountered by TCNs? If so, to what extent and in what ways?
6	Do lengthy and burdensome recognition and validation procedures create additional hurdles? Do these challenges affect certain groups disproportionately (e.g refugees or undocumented migrants)?

#	Guidelines
7	Are there platforms or networks available for exchanging qualification information between EU Member States and/or with third countries?
8	What challenges stem from this lack of coordination with other Member States and TCs? How could collaboration enhance the process of recognition/validation?
9	How aware are migrants/TCNs of the recognition pathways available in your context, and how accessible is the information about these pathways?
10	What challenges exist regarding the availability of information on third-country qualification systems?
11	In your view, why do you think the Commission should act now on the recognition of qualifications and validation of skills of third country nationals (TCNs)? What will be the benefits of EU intervention in the field?
12	Are there any fast-track solutions for specific professions, sectors, or countries? If so, how do they work?
13	What suggestions do you have to improve recognition and validation processes for TCNs in the EU?

Annex 14.3 Questionnaire for survey targeted at CAs

Section	Question	Answer	Response type
Background information	1. Please indicate the EU Member State in which your authority operates	(List of 27 EU Member States)	Drop-down list
	2. Please provide the official name of your competent authority / professional sector	(Open field)	Free text
	3. For which regulated profession(s), within the meaning of Directive 2005/36/EC, is your authority the competent authority for the recognition of professional qualifications? Please add the title of the profession(s) (in English)	(Open field)	Free text
Qualification recognition practice	4. Does your authority assess qualifications of third-country nationals for access to the regulated profession under your competence?	• Yes, regularly • Yes, occasionally • No, another authority is responsible (please specify) • Not applicable	Multiple choice - one answer + free text box for the option “please specify”
	5. Does your legal framework require the same recognition procedures for third-country applicants with third-country qualifications and EU/EEA applicants with EU/EEA qualifications (e.g. deadlines, documentation requirements, appeal rights, compensation measures)?	• Yes, always • Yes, usually • No, procedures differ • It varies case by case • Not sure	Multiple choice - one answer

Section	Question	Answer	Response type
	5. a. If not, how do the procedures for recognition of third-country qualifications held by third-country nationals differ from those applied to EU/EEA applicants with EU/EEA qualifications?	• Additional documents required • Fewer documents required for beneficiaries of international protection • Difference in applicable deadlines • Requirement for prior third-party qualification recognition statement (i.e. ENIC-NARIC) • Difference in rights of appeal • Difference in language requirements • Differences in available compensation measures available • Other (please specify)	Multiple choice - multiple answers + free text box for the option “please specify”
	6. Even where procedures are formally the same, do recognition outcomes and processes differ in practice for third-country nationals with third-country qualifications?	• No, they are comparable in practice • Yes, they often differ • Not sure	Multiple choice - one answer
	6. a. If yes, in what way do they differ? (Select all that apply)	• Longer processing times • More frequent use of compensation measures (tests/adaptation) • More case-by-case assessments • Other (please specify)	Multiple choice - multiple answers + free text box for the option “please specify”
	6. b. If compensation measures are applied more frequently to third-country nationals, what do they consist of? (Select all that apply)	• Tests • Adaptation periods • Bridging courses • Other (please specify)	Multiple choice - multiple answers + free text box for the option “please specify”
	7. To what extent are compensation measures for third-country nationals:	Vertical: • Tailor-made to the individual • Applied automatically/systematically • A mix of both Horizontal: • To a large extent • To a moderate extent • To a small extent • Not at all	Matrix

Section	Question	Answer	Response type
	8. When assessing third-country qualifications of third-country nationals for access, to what extent does your authority perform the following actions?	Vertical: • Compare the applicants' training against the EU minimum training requirements set out in Directive 2005/36/EC (where applicable) • Take into account recognition decisions that may have been made by another Member State (e.g. where the third-country national was previously resident) (if applicable) Horizontal: • To a large extent • To a moderate extent • To a small extent • Not at all • Not applicable	Matrix
	9. Please, provide any additional comments regarding the assessment of third-country qualifications of third-country nationals compared to the EU Minimum training requirements in Directive 2005/36/EC	(Open field)	Free text

Section	Question	Answer	Response type
	10. Which documents are typically required from third-country applicants? (Select all that apply)	• Proof of nationality • Diplomas/certificates • Academic transcripts / curriculum details • Proof of professional experience • Certificate of the nature and duration of the activity issued by a relevant authority • Licences/registration from country of origin • Proof of good character or professional conduct • Proof of physical and mental fitness • Proof of professional liability insurance • Attestation confirming the absence of professional suspension or criminal conviction • Declaration on oath or a solemn declaration with a certificate from an authority or notary attesting the authenticity of the declaration • Third-party recognition statements (e.g. ENIC-NARIC) • Other (please specify)	Multiple choice - multiple answers + free text box for the option “please specify”
	11. What formal requirements must third-country nationals fulfil when submitting their documents? (Select all that apply)	• Digital or verifiable credentials are accepted • Paper/original documents are accepted • Certified translations are required • Legalisation or apostille is required • Other formal requirements (please specify)	Multiple choice - multiple answers + free text box for the option “please specify”
	12. When are certified translations required?	• Always (please specify for what documents) • Sometimes (please specify when and for what documents) • Never	Multiple choice - one answer + free text box for the option “please specify”
	13. When are legalisation/apostille, requirements applied?	• Always (please specify for what documents) • Sometimes (please specify when and for what documents) • Never	Multiple choice - one answer + free text box for the option “please specify”

Section	Question	Answer	Response type
	14. How does your authority check the authenticity of documents? (Select all that apply)	• Internal database/sample comparison • Contacting awarding institutions • Contacting credential evaluation service (e.g. ENIC-NARIC) • National/international verification platforms • Other (please specify)	Multiple choice - multiple answers + free text box for the option “please specify”
	15. To what extent do you trust evidence and documents related to third-country qualifications?	• To a large extent • To a moderate extent • To a small extent • Not at all	Multiple choice - one answer
	16. In your experience, what is the average timeline from complete application to decision for third-country nationals?	• ≤1 month • 1–3 months • 3–6 months • 6–12 months • 1–2 years • 2–3 years • More than 3 years • Do not know	Multiple choice - one answer
	17. What type of costs are typically incurred by third country nationals for recognition of qualifications? (Select all that apply)	• Application fee (please specify) • Translation of documents • Authentication/legalisation • Declaration of value • Additional training/exam/tests • Other (please specify)	Multiple choice - multiple answers + free text box for the option “please specify”
	18. To what extent can third country nationals complete the recognition process using digital procedures (i.e. without in-person or paper-based steps)?	• Fully digital • Mostly digital • Partially digital • Not digital at all • Varies by case or profession	Multiple choice - one answer
	19. In which language(s) can third country nationals submit their application and required documents?	• Only in the official language(s) of the country • In one or more official languages of the European Union • In the applicant's language of choice • It depends on the type of application (please specify)	Multiple choice - one answer + free text box for the option “please specify”

Section	Question	Answer	Response type
	20. Do you accept applications from third-country nationals who do not yet have a visa, or residence or work permit (i.e. pre-arrival assessments)?	• Yes • No	Multiple choice - one answer
	21. How can applicants from third-countries access information on the requirements and procedures for the recognition of qualifications in your country? (Select all that apply)	• Information on the website of the competent authority • ENIC-NARIC initiatives • National ministry websites • NGOs support • Migration authority platforms • Other (please specify)	Multiple choice - multiple answers + free text box for the option “please specify”
	22. From which third countries do you most frequently receive applications? (Please specify)	(Open field)	Free text
Volume and profile of applicants	23. Could you please indicate the approximate annual number of recognition applications assessed?	• Fewer than 50 • 50–200 • 200–1,000 • More than 1,000 • Unknown	Multiple choice - one answer
	24. Could you please indicate the estimated share of applications involving third-country qualifications?	• Less than 10% • 10–30% • 30–60% • Over 60% • Not known	Multiple choice - one answer
	25. What is the approximate number of third-country qualifications held by third country nationals from the total number of third-country qualifications assessed?	• Less than 25% • 25–50% • 50–75% • Over 75% • Not known	Multiple choice - one answer
	26. What is the approximate number of third-country qualifications held by EU/EEA citizens from the total number of third-country qualifications assessed?	• Less than 25% • 25–50% • 50–75% • Over 75% • Not known	Multiple choice - one answer

Section	Question	Answer	Response type
Challenges in assessing Third Countries' qualifications	27. How are cases handled when third-country national applicants lack complete documentation (e.g. refugees/displaced persons)?	• Applications cannot proceed without full documentation • Alternative evidence accepted case-by-case • Skills tests or professional assessment used • Provisional or conditional recognition possible • Other (please specify)	Multiple choice - one answer + free text box for the option "please specify"
	28. What challenges do you encounter when assessing third-country qualifications? (Select all that apply)	• Incomplete or non-transparent documents • Language barriers • Difficulty verifying authenticity • Lack of information on awarding bodies • Limited guidance on equivalence • Difficulty identifying contacts abroad • Lack of digital credentialing tools • High administrative burden • Other (please specify)	Multiple choice - multiple answers + free text box for the option "please specify"
	29. In your view, how will these challenges develop in the EU over the next 5–10 years (e.g. increase, remain stable, decrease)?	• Significantly increase • Slightly increase • Remain stable • Slightly decrease • Significantly decrease	Multiple choice - one answer
	30. Could you please provide examples of how specific challenges will evolve and whether they will affect all third-country nationals or only specific groups (e.g. refugees, beneficiaries of international protection, others)?	(Open field)	Free text

Section	Question	Answer	Response type
Cooperation	31. Do you cooperate with any of the below organisations on cases involving third-country qualifications? (Select all that apply)	• In your country – other recognition/professional authorities • In your country – education/training authorities • In your country – employers/sector bodies • In your country – other (please specify) • In other EU MS – recognition/professional authorities • In other EU MS – ENIC-NARIC centres • In other EU MS – EU networks/contact points • In other EU MS – other (please specify) • In third countries – awarding institutions • In third countries – professional regulators • In third countries – public authorities • In third countries – other (please specify)	Multiple choice – multiple answers + free text box for the option “please specify”
	32. What is the main purpose of this cooperation? (Select all that apply)	• Verifying authenticity of documents • Assessing comparability of qualifications • Clarifying professional standards • Supporting migration/work permit decisions • Handling complex cases • Exchanging recognition decisions • Capacity building/mutual learning • Other (please specify)	Multiple choice - one answer + free text box for the option “please specify”
	33. Do you take into account prior qualification recognition or skills assessment conducted for migration/residence/work permit purposes in your Member State?	• Yes always (please explain) • Yes, sometimes (please explain) • No • Not applicable	Multiple choice - one answer + free text box for the option “please specify”
	34. Are you aware of any duplication of recognition/assessment of qualification processes with other authorities in your Member State?	• Yes, frequent duplication (please specify) • Occasional duplication (please specify) • No duplication	Multiple choice - one answer + free text box for the option “please specify”

Section	Question	Answer	Response type
System improvements, support needed and potential for EU action	35. Which measures would most help improve the recognition of qualifications and validation of skills of third-country nationals in your Member State? (Select up to 5)	• Guidance/best practices • Clearer assessment criteria • Common rules on procedures • Stronger administrative cooperation (e.g. IMI) • Tools to verify authenticity • Data exchange systems • Mutual learning activities • Enhanced cooperation with third countries • Better coordination with migration authorities • Additional staff/resources • Other (please specify)	Multiple choice - one answer + free text box for the option “please specify”
	36. In which areas could EU-level action most effectively support your authority's work in recognising third-country qualifications? (Select all that apply)	• Common EU rules • Coordination obligations (migration/recognition) • Multilingual information for applicants • EU minimum training standards • EU accreditation of third-country institutions • EU register for automatic recognition • EU database of qualifications • Fast-track schemes for shortage professions • Cooperation with employers/social partners • Capacity building/training • Other (please specify)	Multiple choice - one answer + free text box for the option “please specify”

Section	Question	Answer	Response type
	37. How would an EU action aiming to streamline the recognition of third country qualifications held by TCNs impact the following costs for your organisation?	Vertical: • Number of the FTEs devolved to the recognition process • Further investment on digitalisation (e.g. EU register/EU database) • Increase number of activities due to increased cooperation with third countries • Increase number of activities due to systematic exchanges of information and/or mutual learning activities Horizontal: • Substantial decrease in costs • Small decrease in costs • No change • Small increase in costs • Substantial increase in costs	Matrix
	38. What are other possible costs that your organisation might incur if rules and procedures for recognition of third country qualifications held by TCNs were streamlined and/or fast-track procedures introduced?	(Open field)	Free text
	39. To what extent do you think that an EU intervention aimed at streamlining and simplifying rules and procedures on recognition of third country qualifications would be beneficial to:	• Improving efficiency of daily tasks • Simplification and harmonisation of procedures • Improving trust in third-country qualifications • Ensuring predictable outcomes for applicants • Other (please specify)	Multiple choice - one answer + free text box for the option “please specify”
Final Comments	40. Is there anything else you would like to share regarding the process for the recognition and assessment of third-country qualifications in your profession/authority?	(Open field)	Free text

Annex 14.4 Questionnaire for survey targeted at migration authorities

Section	Question	Answer	Response type
Background information	1. Please indicate the EU Member State in which your authority operates		Drop-down list
	2. Please provide the official name of your organisation		Free text
	3. Please indicate the type of authority completing this survey (Select all that apply):	• National ministry responsible for legal migration • Immigration or asylum agency • Police or border authority involved in migration decisions • Labour migration or work-permit office • Work and employment authorisation office (PES) • Regional or local migration authority • Ministry or department with oversight responsibility • Other (please specify): _____	Multiple choice – multiple answers + free text box for the option "Other
Scope and use of skills and qualification checks	4. Does your authority conduct or rely on skills, and qualification checks as part of labour migration procedures?	• Yes, systematically for certain migration routes • Yes, occasionally on a case-by-case basis • No • Not sure	Multiple choice - one answer
	5. Approximately how many migration-related applications involving qualification or skills assessment does your authority process annually:	• Fewer than 100 • 100–1,000 • 1,000–10,000 • More than 10,000 • Unknown	Multiple choice - one answer

Section	Question	Answer	Response type
	6. 6. For which migration routes are skills and qualification check most commonly required? (Select all that apply)	• Labour migrants (all) • Highly skilled (e.g. Blue Card) • National highly skilled permits • EU Single Permit • Skilled technical (e.g. holder of VET qualifications) • Seasonal workers • Family reunification • Students/researchers • Entrepreneurs/investors • International protection • Long-term residents • Intra-corporate transferees • Other (please specify)	Multiple choice - multiple answer + free text box for the option “Other”
	7. What are the main objectives of conducting qualification or skills checks in your procedures? (Select all that apply)	• Eligibility for permit category • Eligibility for shortage occupation requirements • Eligibility for sector-specific requirements • To facilitate employer approval or sponsorship • Regulated profession compliance • Labour market tests • Integration or activation planning • Other (please specify)	Multiple choice - multiple answer + free text box for the option “Other”
	8. When your authority carries out or relies on skills and qualifications checks, which of the following elements are used as part of those checks? (Select all that apply)	• Formal recognition decision required for the migration decision • Formal recognition decision requested due to later access to a regulated profession • Validation of skills (including non-formal or informal learning) • Professional experience check • Check of the level of qualification • Authenticity and validity check • Field of study relevance check (e.g. job-offer fit) • Language skills check • Other (please specify)	Multiple choice - multiple answer + free text box for the option “Other”

Section	Question	Answer	Response type
	9. 9. At what stage(s) of the migration process do the necessary check of skills and qualifications occur? (Select all that apply)	• During the assessment of applications for a work permit, residence permit or visa (please, specify the type of permit) • As part of a labour market test • As part of the assessment of employer approval or sponsorship submitted to migration authorities • As part of a point-based assessment or eligibility screening for permit issuance • As part of a pre-departure assessment • During the assessment of applications for renewal or status-change • As part of integration-related or post-arrival procedures (please specify the type of procedures) • Other stage or process (please specify)	Multiple choice - multiple answer + free text box for the option “Other”

Section	Question	Answer	Response type
How checks are carries out (routes, actors, evidence)	10. For each type of check selected in Question 8, how is it most commonly handled?	**Rows** • In-house document review by the migration authority • In-house technical assessment • Referral to ENIC-NARIC or another recognition body • Referral to a professional regulator • Referral to an employer or labour authority for confirmation • Use of external databases or tools • Digital/automated verification tools *(applies across rows of check types)* **Columns** • Formal recognition decision required for the migration decision • Formal recognition decision requested due to later access to a regulated profession • Skills (including non-formal or informal learning) • Professional experience check • Check of the level of qualification • Authenticity and validity check • Field of study relevance check (e.g. job offer-fit) • Language skills check	Matrix
	11. What documentation or evidence is typically requested when skills or qualification checks are required? (Select all that apply)	• Diplomas or transcripts • Digital credentials • Certified translations • Apostille or legalisation • Evidence of work experience • Employer references or declarations • CV or portfolio • Previous recognition decisions (if available) • Language certificates • Other (please specify)	Multiple choice - multiple answer + free text box for the option “Other”

Section	Question	Answer	Response type
	12. How are cases with missing or incomplete documentation usually handled? (Select all that apply)	• Partial evidence accepted • Structured interviews • Practical or skills tests • Self-declaration by the applicant • Referral to another authority or service • Cannot proceed without documents • Other (please specify)	Multiple choice - multiple answer + free text box for the option “Other”
	13. If your authority carries out validation of skills or experience (Type C - see the background section), which methods are used? (Select all that apply)	• Employer references • Competency-based interviews • Practical tests • Portfolio review • Professional body validation • Caseworker assessment • Other (please specify)	Multiple choice - multiple answer + free text box for the option “Other”
	14. Do you use any of the following digital tools to assess skills and qualifications of TCNs acquired in a third country? (Select all that apply)	• Digital credentials / authenticity tools (please specify) • Internal systems tracking qualification checks (please specify) • EU platforms (please, specify) • Digitalisation plans or reforms are ongoing (please, specify)	Multiple choice - multiple answer + free text boxes
Timing, fees and prioritisation	15. When skills or qualification checks are required, how are they processed?	• Sequentially (the check must be completed before the migration decision can proceed) • In parallel with the migration procedure • Depending on the migration route • Not sure	Multiple choice - one answer
	16. What is the typical additional processing time attributable to skills or qualification checks?	• Less than 2 weeks • 2-6 weeks • 6-12 weeks • More than 12 weeks • Not available	Multiple choice - one answer

Section	Question	Answer	Response type
	17. Are there specific fees related to skills or qualification checks?	• No • Yes, charged by the migration authority (please specify the amount) • Yes, charged by another public authority (please specify the amount) • Yes, charged by a professional regulator (please specify the amount) • Yes, charged by a private provider (please specify the amount) • Not sure	Multiple choice - one answer + free text boxes
	18. Does your authority offer different procedures for any of the following categories of migrants? (Select all that apply)	• Labour migrants (differentiate by skill level, e.g. do they distinguish between high and low-skilled migrants) • Researchers/academia • Seasonal workers • Refugees/displaced persons • No, procedures are the same for all categories of migrants	Multiple choice - multiple answers
	19. Are there priority or accelerated procedures for certain groups or occupations?	• Yes • Planned • No • Not sure	Multiple choice - one answer
	19. a. If yes, which groups benefit from prioritisation? (Select all that apply)	• Shortage occupations • Healthcare, STEM or innovation-related occupations • Refugees or beneficiaries of protection • Other (please specify)	Multiple choice - multiple answer + free text box for the option “Other”

Section	Question	Answer	Response type
	19. b. If yes, how does prioritisation or acceleration take place in practice? (Select all that apply)	• Priority processing channel • Automatic or expedited recognition • Parallel processing of checks and migration decision • Provisional/conditional access to employment • Reduced documentation or simplified checks • Pre-arrival verification • Dedicated staff or fast-track units • Other (specify)	Multiple choice - multiple answer + free text box for the option “Other”
	20. What safeguards or support mechanisms are provided to applicants within migration processes during the qualification or skills checks? (Select all that apply)	• Clear information on requirements • Guidance/contact points • Translation/interpretation support • Appeals or review mechanisms • Special support for vulnerable groups • Availability of skills validation • Availability of bridging courses • Availability of language programmes	Multiple choice - multiple answer
Cooperation	21. Does your authority cooperate with the following actors when assessing qualifications? (Select all that apply)	• ENIC-NARIC / academic recognition authorities • Professional regulators • Labour market or public employment services • Ministries of education • Foreign education/recognition authorities through formal agreements or protocols (please specify) • EU-level networks or expert groups • Regional/local authorities	Multiple choice - multiple answers + free text box
	22. Does your authority use any digital or data-sharing platforms with other national authorities or other Member States?	• Yes (please specify with whom and how it works) • No	Multiple choice - one answer + free text box for the option “Yes”

Section	Question	Answer	Response type
Challenges and possible improvements	23. How often do skills or qualification checks create delays, refusals, or repeated exchanges with other bodies?	• Very often • Often • Sometimes • Rarely • Never • Not sure	Multiple choice - one answer
	24. At which stages do challenges most frequently arise? (Select up to three)	• Document completeness or authenticity • Comparability or level assessment • Referral to other authorities • Waiting for external decisions • Regulated profession requirements • Employer or job-related issues • Appeals or renewals • Other (please specify)	Multiple choice - multiple answer + free text box for the option “Other”
	25. Which measures would most improve the handling of skills and qualification checks in labour migration procedures? (Select up to five)	• Clear, route-specific guidance for applicants and employers • Standardised document requirements for each type of skills or qualification check • Digital submission and case tracking • Better coordination between migration and recognition authorities • Trusted lists or tools to verify qualifications • Expert intermediary organisations to support skills and qualifications checks • Procedures for missing documents • Staff training • Pre-arrival checks • Other (please specify)	Multiple choice - multiple answer + free text box for the option “Other”
	26. Please provide one example of a solution or practice that works well in your system	• (Free text field)	Free Text

Annex 14.5 Questionnaire for survey targeted at ENIC NARIC centres

Section	Question	Answer	Response type
Background information	1. Please indicate the EU Member State in which your NARIC centre operates		Drop-down list
	2. Please provide the official name of your NARIC centre		Free text
Scope of responsibilities	3. For which of the following areas does your NARIC centre have responsibility in relation to foreign qualifications and skills of third-country nationals (TCNs)? (Select all that apply)	• Recognition of higher education qualifications • Recognition of secondary education qualifications • Recognition of vocational education and training (VET) qualifications • Recognition of professional qualifications within the meaning of Directive 2005/36/EC • Recognition of qualifications for non-regulated professions • Validation of non-formal and informal learning • Other (please specify)	Multiple choice – multiple answers + free text box for the option “Other”

Section	Question	Answer	Response type
	4. For each of the following groups, please indicate the role of your NARIC centre regarding qualifications of TCNs:	**Rows** • Higher education institutions • Employers • Professional regulators / competent authorities • Labour migration / employment authorities **Columns** • Issues legally binding recognition decisions • Issues non-binding comparability statements or recommendations • Acts as appeal body • Provides information / guidance only (no formal decision) • Not involved • Other authorities (please specify)	Matrix – one answer per row
Recognition of qualifications for labour market access	5. Does your NARIC centre play a role in cases involving access to regulated professions for TCNs with a foreign qualification?	• Yes, NARIC issues a formal recognition decision • Yes, NARIC provides an assessment or comparability input used by competent authorities • Yes, NARIC provides information and guidance only • No, responsibility lies entirely with other authorities (please, specify which authorities: ____)	Multiple choice - one answer + free text box for the option "Other"
	6. Does your NARIC centre support access to unregulated professions in the wider labour market for TCNs with a foreign qualification and unrelated to any migration procedure?	• Yes, through recognition decisions • Yes, through comparability statements or recommendations to employers • Yes, through information and guidance only • No	Multiple choice - one answer

Section	Question	Answer	Response type
	7. Does your NARIC centre support labour migration, employment, or skills authorities in understanding or assessing foreign qualifications and skills of TCNs?	• Yes, Always • Yes, often • Yes, occasionally • No	Multiple choice - one answer
	7.a. If yes, please specify the type of support provided. (Select all that apply)	• Provision of formal recognition decisions • Issuance of comparability / qualification assessment statements • Written advisory opinions (non-binding) • Informal guidance or case-by-case advice • Training or capacity-building for authorities • Access to databases or information tools • Data sharing or statistical input • Other (please specify): _____	Multiple choice - multiple answers + free text box for the option “Other” (Display if the answer to question 7 is: Yes, always; yes, often; yes, occasionally)
Procedures, documentation, timelines, and costs	8. Which of the following procedures does your NARIC centre operate for TCNs?	• Fully digital application and decision • Partially digital • Paper-based procedures (application and decision) • Fast-track or simplified procedures for specific groups • No formal procedure	Multiple choice - one answer

Section	Question	Answer	Response type
	9. For each of the following types of applications by TCNs, please indicate which documents are typically required by your NARIC centre.	**Rows (type of application)** • Recognition for further learning • Recognition for regulated professions • Recognition for non-regulated professions • Validation of non-formal / informal learning • Statements of comparability **Columns (types of documents)** • Proof of identity (ID/passport) • Diploma(s) / certificate(s) • Transcript / diploma supplement • Proof of accreditation of awarding institution / programme • Proof of work experience • Certificate of the nature and duration of the professional activity issued by the relevant authority • Licences/registration from country of origin • Portfolio of skills / competences • Proof of purpose (e.g. job offer, admission) • Certified translation(s) • Legalisation / apostille • Self-declaration / sworn statement • Other (please specify)	Matrix – one answer per row+ free text box for the option "Other"

Section	Question	Answer	Response type
	10. What is the average time from receipt of a complete application to decision for a TCN or the following?	**Rows** • Recognition for further learning • Recognition for regulated professions • Recognition for non-regulated professions • Validation of skills / prior learning • Issuing comparability statements **Columns** • Two weeks or less • About one month • Between 1 and 3 months • Between 3 and 6 months • Between 6 and 9 months • Between 9 months and 1 year • Over 1 year • Not applicable	Matrix – one answer per row
	11. How many FTEs in your organisation work on aspects related to the recognition of professional qualifications of TCNs?	• Less than 0.5 FTE • 0.5-1 FTE • 1-2 FTEs • 2-5 FTEs • 5-10 FTEs • More than 10 FTEs (please specify)	Multiple choice - one answer + free textbox for the "please specify" answer
	12. Are fees charged to TCNs?	• No, procedures are free of charge • Yes, a fixed fee applies (please specify the amount and the type of procedure: _____) • Fees vary depending on the case (please specify:_____)	Multiple choice - one answer + free text box for the option "Other"

Section	Question	Answer	Response type
	13. To what extent do you use artificial intelligence (AI) tools for the recognition procedures?	**Rows** • Gathering background information • Assessment of the submitted documents • Validation of skills and prior learning • Other (please, specify: ____) **Columns** • To a large extent • Toa moderate extent • To a small extent • Not at all	Matrix – one answer per row+ free text box for the option "Other"
	14. Does your NARIC centre have any role in the validation of non-formal or informal learning of TCNs?	• Yes, formal validation decisions • Yes, non-binding assessments or advice • Information and guidance only • Other (please, specify: ____) • No role	Multiple choice - one answer + free text box for the option "Other"
	15. Does your centre accept or assess alternative forms of evidence (e.g. work experience, portfolios, self-declarations) in cases where formal documentation is missing?	• Yes, systematically (please, specify: _____) • Yes, in exceptional cases (please, specify: _____) • No	Multiple choice - one answer + free text box for the option "Other"

Section	Question	Answer	Response type
Refugees and beneficiaries of international protection	16. Does your NARIC centre apply specific procedures or arrangements for the recognition of qualifications and/or validation of skills of specific groups of TCNs, e.g. refugees, beneficiaries of international protection, temporary protection, or other humanitarian statuses?	**Rows** • Refugees • Beneficiaries of international protection • Beneficiaries of temporary protection • Other (please, specify: ____) Columns • Yes, dedicated procedures apply • Yes, certain adaptations or flexibilities apply within standard procedures • No, the same procedures apply as for other third-country nationals with foreign qualifications • Not applicable / no cases handled	Matrix – one answer per row+ free text box for the option "Other"
	17. To what extent are the following adaptations applied to specific groups of TCNs e.g. refugees, beneficiaries of international protection, temporary protection, or other humanitarian statuses?	**Rows** • Reduced or waived fees • Simplified documentation requirements • Acceptance of alternative evidence (e.g. sworn statements, self-declarations, interviews) • Competence-based or skills-based assessments • Faster or prioritised processing • Specific guidance or counselling for applicants • Cooperation with asylum, integration, or employment authorities **Columns** • To a large extent • Toa moderate extent • To a small extent • Not at all	Matrix – one answer per row

Section	Question	Answer	Response type
	18. Do you accept the Council of Europe European Qualifications Passport for Refugees as a basis for recognition/validation decision?	• Yes • No • Don't know	Multiple choice - one answer
Information provision and targeted support	19. To what extent does your NARIC centre provide targeted information and support specifically for TCNs?	**Rows** • Comprehensive and targeted information • Partial or general information • Minimal information • No targeted information **Columns** • To a large extent • Toa moderate extent • To a small extent • Not at all	Matrix – one answer per row
	20. To what extent are the following mechanisms used to provide information to TCNs?	**Rows** • Dedicated website or online portal • Targeted web pages for TCNs • Written guidance or FAQs • Email support • Telephone support • In-person consultations • Webinars or online events • Social media **Columns** • To a large extent • Toa moderate extent • To a small extent • Not at all	Matrix – one answer per row

Section	Question	Answer	Response type
	21. Does your NARIC centre provide targeted informal information or informal support to the following bodies regarding TCQs and skills?	**Rows** • Relevant CAs for recognition of professional qualifications • National migration authorities responsible for labour migration • National employment authorities • Employers **Columns** • Yes, on a regular basis • Yes, occasionally • No	Matrix – one answer per row
	22. Does your NARIC provide the following type of information to relevant authorities and bodies? (Select all that apply)	Rows • Relevant CAs for recognition of professional qualifications • National migration authorities responsible for labour migration • National employment authorities • Employers Columns • Written guidance • Briefings • Training • Informational advice • None of these options	Matrix – one answer per row
Cooperation with third countries	23. Does your NARIC centre cooperate with (non-ENIC) authorities or institutions in third countries to support trust-building and information exchange on education systems and qualifications?	• Yes, on a regular basis • Yes, occasionally • No	Multiple choice - one answer

Section	Question	Answer	Response type
	23.a. If yes, which forms of cooperation are in place? (Select all that apply)	• Direct contacts with recognition authorities or ministries • Cooperation with education institutions • Participation in joint projects or initiatives • Exchange of information on accreditation and quality assurance systems • Use of bilateral or multilateral agreements • Informal expert networks or focal points • Other (please specify)	Multiple choice - multiple answers + free text box for the option "Other (Display if the answer to question 23 is: Yes, on a regular basis; yes, occasionally)
	24. To what extent does your NARIC centre use the information obtained through cooperation with third countries for the following purposes?	**Rows** • To assess institutional or programme accreditation • To verify authenticity of qualifications • To improve comparability assessments • To support guidance to employers or authorities • To develop country profiles or internal databases **Columns** • To a large extent • To a moderate extent • To a small extent • Not at all	Matrix – one answer per row
	25. What are the main challenges in cooperating with third-country authorities or institutions?		Free text

Section	Question	Answer	Response type
Challenges and solutions	26. What are the main challenges your NARIC centre faces in recognising qualifications or validating skills of TCNs? (Select all that apply)	• Lack of reliable information on foreign institutions or programmes • Document authenticity and fraud concerns • Missing or incomplete documentation • Long verification times with third-country authorities • Limited staff or financial resources • Legal or procedural constraints • Language barriers • Duplications and inconsistencies of national procedures with different authorities carrying out similar procedures • Other (please specify)	Multiple choice - multiple answers + free text box for the option “Other
	27. What solutions or approaches has your centre developed to address these challenges?		Free text
	28. To what extent do you think TCNs face the following challenges in the recognition of professional qualifications and validation of their skills obtained in third countries?	**Rows** • The national procedures for the recognition of professional qualifications and validation of skills obtain in third countries are highly different among EU countries • There is a lack of trust and understanding of qualifications obtained in third countries • There is limited cooperation with third-country authorities on the recognition of professional qualifications **Columns** • To a large extent • To a moderate extent • To a small extent • Not at all	Matrix – one answer per row
	29. Do you think TCNs face additional challenges to those mentioned in the previous question as concerns the recognition of professional qualifications and validation of their skills obtained in third countries?		Free text

Section	Question	Answer	Response type
	30. To what extent do EU citizens that obtained a professional qualification in a third country face similar challenged as those experienced by TCNS for the recognition of their qualifications in the EU?	**Rows** • EU citizens with a TCQ moving to his/her own Member State • EU Citizens with a TCQ moving to an EU Member State different than his/her own Member State **Columns** • To a large extent • To a moderate extent • To a small extent • Not at all	Matrix – one answer per row
	31. In your opinion, what are the consequence of these challenges? (Select all that apply)	• TCNs outside the EU do not consider the Single Market as a potential place to work • TCNs outside the EU disengage during recognition procedures • TCNs in the EY suffer from overqualification and/or underemployment limiting job satisfaction and integration • Employers, including SMEs, face barriers to recruit TCNs to address skill shortages • Other (please specify)	Multiple choice - multiple answers + free text box for the option “Other
	32. In your view, how will these challenges develop in the EU in the next 5-10 years?	• Significantly increase • Slightly increase • Remain stable • Slightly decrease • Significantly decrease	Matrix – one answer per row
	33. Could you please provide examples of how specific challenges will evolve and whether they will affect all TCNs or only specific groups (e.g. refugees, beneficiaries of international protection, others)?		Free text

Section	Question	Answer	Response type
	34. To what extent do you deem an EU intervention necessary to ensure:	**Rows** • A common framework to streamline procedures for recognition of third-country qualifications held by TCNs • Equal treatment between EU citizens and TCNs holding a qualification obtained in a third country • Cooperation between EU Member States and third countries • A common and streamlined effort across Member States towards a better provision of information and targeted support to TCNs **Columns** • To a large extent • To a moderate extent • To a small extent • Not at all	Matrix – one answer per row

Section	Question	Answer	Response type
	35. To what extent do you think that an EU intervention would be beneficial to:	**Rows** • Enhancing the simplification and harmonisation of procedures for recognising qualifications obtained in third countries • Improving trust on qualifications and skills acquired in third countries • Ensuring that TCNs have predictable outcomes with regard to the recognition of their qualifications obtained in third countries common framework to streamline procedures for recognition of third-country qualifications held by TCNs • Other (please specify) **Columns** • To a large extent • To a moderate extent • To a small extent • Not at all	Matrix – one answer per row + free text box for the option "Other

Section	Question	Answer	Response type
	36. To what extent would an EU intervention in the field bring the following social and economic impacts?	**Rows** • Improved labour mobility in the EU • Improved capacity of EU employers, including SMEs, to attract highly skilled workers • Improved capacity of the EU labour market to address labour and skill shortages in critical sectors • Increase competitiveness of the EU • Improved integration of TCNs and overall social cohesion • Improved the quality of work • Other (please specify) **Columns** • To a large extent • To a moderate extent • To a small extent • Not at all	Matrix – one answer per row + free text box for the option "Other
	37. What types of costs does your NARIC face when providing information and targeted support to TCNs? (Select all that apply)	• Website maintenance, including online guidance and application portal • Printed materials (e.g. brochures, guides) • Conducting workshop and information sessions • Translation and interpretation costs (e.g. translating foreign diplomats, transcript or supporting documents) • Hiring interpreters • Assessment or verification • Other (please specify	Multiple choice - multiple answers + free text box for the option "Other

Section	Question	Answer	Response type
	38. How would an EU action aiming to streamline the recognition of TCQs held by TCNs impact the following costs for your organisation?	**Rows** • Website maintenance, including online guidance and application portal • Printed materials (e.g. brochures, guides) • Conducting workshop and information sessions • Translation and interpretation costs (e.g. translating foreign diplomas, transcript or supporting documents) • Hiring interpreters • Assessment or verification costs **Columns** • Substantial decrease in costs • Small decrease in costs • No change • Small increase in costs • Substantial increase in costs	Matrix – one answer per row
	39. Based on your perspective, to what extent do the costs of an EU action introducing new rules for the recognition of TCQs held by TCNs outweigh the benefits?	• To a large extent • To a moderate extent • To a small extent • Not at all	Multiple choice - one answer
	40. Please, feel free to add any final remark that you may consider relevant for our study		Free text

Annex 14.6 Questionnaire for survey targeted at TCNs

Section	Question	Answer	Response Type
Background information	1. What is your country of origin?	—	Free text
	2. In which country did you complete your highest level of education or training?	—	Free text
	3. What is your highest level of education or training?	• Primary education • Lower secondary education • Upper secondary education (General) • Upper secondary education (VET) • Post-secondary non-tertiary (VET) • Short-cycle tertiary (Academic) • Short-cycle tertiary (VET) • Bachelor's degree • Master's degree • Doctorate / PhD • Professional certification • Other (please specify)	Multiple choice – one answer + free text
Experience with recognition	4. Have you ever tried to get your qualification(s) recognised in an EU country?	• Yes, I have done this • No, but I plan to do this • No, and I don't plan to do this	Multiple choice – one answer
	5. What is your field of occupation or profession?	• Healthcare • Engineering or Architecture • Legal profession • Education or Teaching • Finance or Accounting • IT or Technology • Skilled trades • Other regulated profession (please specify) • Non-regulated profession/other occupation (please specify)	Multiple choice – one answer + free text
	6. In which country did you try or plan to get your qualification recognised?	—	Free text

Section	Question	Answer	Response Type
	7. What motivated you to have your qualifications recognised?	• Work in a regulated profession • Meet job requirements abroad • Visa / residence / work permit • Improve job chances • Career progression/pay • Other (please specify)	Multiple choice – multiple answers + free text
	8. To what extent are the following challenges a problem? (3 statements)	**Columns** • Recognition processes for accessing a regulated profession in another country are often lengthy, complex and costly • People who have studies and acquired skills outside the EU do not have a uniform and simple way to get their qualifications recognised and their skills validated to access the EU labour market. • Employers in the European Union who want to recruit people from outside of the EU struggle to understand what people can do and/or need to wait for their qualifications to be recognised **Rows** • Not a problem at all • A small problem • A moderate problem • A big problem • A very big problem	Matrix
	9. Have you had personal experiences with these challenges?	• Yes • No	Multiple choice – one answer
	9a. Please tell us about your experience	—	Free text

Section	Question	Answer	Response Type
	10. Where did you look for information about recognition?	• Official government websites • EU websites (e.g. Your Europe, Europass) • Social media / online forums • Friends / family networks • Professional organisations / unions • Employer or recruiter • Recognition authorities / contact points • Other (please specify) • I didn't look for information	Multiple choice – multiple answers + free text
	11. How clear was the information you found?	• Very clear • Somewhat clear • Not clear • Not available / couldn't find it	Multiple choice – one answer
	12. What was the outcome of your application?	• Fully recognised • Partially recognised • Not recognised • Pending / appeal • Withdrew application • Recognition not needed • Other (please specify)	Multiple choice – one answer + free text
	13. How long did the recognition process take from start (gathering all necessary documents) to finish (receiving a decision or final outcome)?	• ≤1 month • 1–3 months • 3–6 months • 6–12 months • 1–2 years • 2–3 years • >3 years • Don't know / don't remember	Multiple choice – one answer

Section	Question	Answer	Response Type
	14. How long did it take to start working after application?	• Immediately • <1 month • 1–3 months • 3–6 months • >6 months • Did not start working	Multiple choice – one answer
	15. Were you working below your qualification level during the process?	• Yes • No • Not working • Not applicable	Multiple choice – one answer
	16. Does your job match your qualification level?	• Yes, fully • Yes, partially • No, below qualification level • Not working	Multiple choice – one answer
	17. What is your gross monthly income?	• Below €1,000 • €1,000–€1,500 • €1,501–€2,500 • €2,501–€4,000 • Above €4,000 • Not working • Prefer not to say	Multiple choice – one answer
	18. How much did the recognition process cost?	• €0 • €1–250 • €251–500 • €501–1,000 • €1,001–€2,500 • >€2,500	Multiple choice – one answer

Section	Question	Answer	Response Type
	19. How did the process or outcome affect you?	• Job matching qualifications • Job below qualifications • Job in different field • Continued/resumed training • Delays in starting a job • Missed job opportunity • Discouraged mobility • Left EU / migrated elsewhere • Still in process • No significant impact • Other (please specify)	Multiple choice – multiple answers + free text
Concluding questions	20. Do you want to add anything about the recognition process?	—	Free text
	21. Would you like to submit your response?	• Yes • No	Multiple choice – one answer

Annex 14.7 Questionnaire of the Public Consultation

Section	Question	Answer	Response Type
General information about respondents	1. Language of my contribution	• Dropdown list of languages	Multiple choice – one answer
	2. I am giving my contribution as	• A private person • A company or business • A university/research centre/think tank • A business association • A trade union • A consumer organisation • An education provider • An NGO • A public authority • Other	Multiple choice – one answer
	3. Which of these sectors are you related to?	• Aerospace • Agri-food • Construction • Cultural industries • Digital • Electronics • Energy • Health • Transport • Social economy • Retail • Textile • Tourism • Public sector • None • Other	Multiple choice – one answer
	4. Organisation name	• Free text	Free text

Section	Question	Answer	Response Type
	5. Scope of your organisation	• International • National • Regional • Local	Multiple choice – one answer
	6. Transparency register number	• Free text	Free text
	7. Organisation size	• Micro • Small • Medium • Large	Multiple choice – one answer
	8. In what country is your organisation (primarily) based?	• List of countries	Multiple choice – one answer
	9. To what extent are you involved in recruitment or hiring processes in your organisation?	• Directly involved • Indirectly involved • Not involved • Don't know	Multiple choice – one answer
	10. What is your nationality?	• List of countries	Multiple choice – one answer
	11. Where do you live?	• List of countries	Multiple choice – one answer
	12. Do you live in a border region and work in a different country than where you live (i.e. do you commute across a border for work)?	• Yes • No	Multiple choice – one answer
	13. In what year were you born?	• List of years	Multiple choice – one answer
	14. What is your gender?	• Female • Male • Other	Multiple choice – one answer

Section	Question	Answer	Response Type
		• Prefer not to say	
	15. What is your highest level of education or training?	• Primary • Secondary • Vocational • Bachelor • Master • PhD • Professional certification • Other	Multiple choice – one answer
	16. In which country did you complete your highest level of education or training?	• List of countries	Multiple choice – one answer
	17. What is your current situation?	• Employed • Self-employed • Jobseeker • Student • Apprentice • Retired • Other	Multiple choice – multiple answers
	18. Have you ever applied for jobs or worked in a country of the European Union different from the one where you acquired your qualifications or skills (or do you plan to do so in the next 2 years)?	• Yes (past) • Yes (current) • Yes (planned) • No	Multiple choice – one answer
	19. When was this?	• <5 years • 5–10 years • >10 years	Multiple choice – one answer
	20. If not, why not?	• Recognition concerns • Skills undervalued • Process too complex • Other reasons • Never considered	Multiple choice – one answer

Section	Question	Answer	Response Type
	21. Have you hired or tried to hire workers from another country in the last 5 years?	• EU • Non-EU • Both • No • Don't know	Multiple choice – one answer
	22. Do most of the workers you hired from another country come from specific countries or regions?	• Yes • No	Multiple choice – one answer
	23. If yes, which ones and why?	• Free text	Free text
Problems/Challenges	24. To what extent do you consider the following challenges related to skills portability in the EU to be a problem?	**Rows** • Employers find it more difficult to understand and trust qualifications obtained in a country other than their own. • Employers in other countries find it difficult to understand what skills a person has acquired through work experience. • The certificates (e.g. micro-credentials) that a person receives after following a short training course have less value for employers who are unfamiliar with the course provider and the training conditions. • Qualifications are rarely issued as verifiable digital credentials. • Qualifications issued as verifiable digital credentials in one country cannot be easily shared with employers or authorities in other EU countries. • Recognition processes for accessing a regulated profession in another country are often lengthy, complex and costly. • People who have studied and acquired skills outside the EU do not have a uniform and simple way to get their qualifications recognised and their skills validated to access the EU labour market.	Matrix

Section	Question	Answer	Response Type
		• Employers in the European Union who want to recruit people from outside of the EU struggle to understand what people can do and/or need to wait for their qualifications to be recognised. **Columns** • Not a problem at all • A small problem • A moderate problem • A big problem • A very big problem	
	25. Do you think there are other issues that make it harder for people to have their skills and qualifications understood, recognised and valued in another country? If so, please elaborate	• Free text	Free text
	26. Have you had any personal experiences with any of these challenges, for example, when applying for jobs in a different country, recruiting people from another country or dealing with the recognition of qualifications or validation of skills?	• Yes • No	Multiple choice – one answer
	27. Please tell us about your experience	• Free text	Free text
	28. To what extent were the qualifications that you acquired in a different country accepted by employers?	• Fully accepted - employers understood and trusted them without any additional checks or formal recognition. • Partly accepted - employers considered me as an eligible candidate but did not place me at the level or pay that corresponds to my qualifications. • Not accepted - employers required formal recognition or additional proof before considering my application. • Other (please specify)	Multiple choice – one answer

Section	Question	Answer	Response Type
	29. How did this affect how well your job matched your qualifications?	• It helped ensure my job matched my qualifications well • It resulted in me being overqualified for the job I obtained. • It resulted in me being underqualified for the job I obtained. • It did not have any impact. • I did not obtain a job. • Don't know / Prefer not to say	Multiple choice – one answer
	30. To what extent were the skills that you acquired in a different country accepted by employers (your previous work or volunteering experience, for example)?	• Fully accepted - employers understood what I could do. • Partly accepted - employers asked me to present further official evidence of these skills. • Not accepted - employers did not consider me as an eligible candidate. • Other (please specify)	Multiple choice – one answer
	31. How did this affect how well your job matched your level of skills (what you can do based, for example, on your previous work experience)?	• It helped ensure my job matched my skills. • It resulted in me being overqualified for the job I obtained. • It resulted in me being underqualified for the job I obtained. • It did not have any impact. • I did not obtain a job. • Don't know / Prefer not to say	Multiple choice – one answer
	32. Have you ever tried to get your qualification(s) recognised in an EU country?	• Yes, I have done this. • No, but I plan to do this. • No, and I don't plan to do this	Multiple choice – one answer
	33. In which country?	• Free text	Free text

Section	Question	Answer	Response Type
	34. What motivated you to have your qualifications recognised?	• To work in a regulated profession • To meet the requirements for a job vacancy • For a visa / residence / work permit application • To improve my chances of getting a job matching my qualifications in another country. • To progress at work or get better pay/conditions • Other	Multiple choice – multiple answers
	35. Where did you look for information about the recognition of qualifications?	• Official government websites • EU websites (e.g. Your Europe, Europass) • Social media or online forums • Friends/family or informal networks • Professional organisations or unions • Employer or recruiter • Recognition authorities / contact point • Other • I didn't look for information	Multiple choice – multiple answers
	36. How clear was the information you found about the requirements for recognition?	• Very clear • Somewhat clear • Not clear • Not available / I couldn't find them	Multiple choice – one answer
	37. Was support or assistance available during the recognition process?	• Yes, and it was helpful. • Yes, but it was not helpful. • No support was available. • I did not seek any support	Multiple choice – one answer
	38. How long did the recognition process take from start (gathering all necessary documents) to finish (receiving a decision or final outcome)?	• ≤1 month • 1–3 months • 3–6 months • 6–12 months • 1–2 years • 2–3 years • More than 3 years • Don't know / Don't remember	Multiple choice – one answer

Section	Question	Answer	Response Type
	39. Approximately how much did the recognition process cost you overall (please estimate all fees and costs paid, including for translations, certifications and the application)?	• €0 • €1–250 • €251–500 • €501–1.000 • €1.001–€2.500 • More than €2.500 • Prefer not to say • Don't know / Don't remember • Not applicable	Multiple choice – one answer
	40. How did the process or outcome of the recognition decision affect you?	• It allowed me to obtain a job that matched or exceeded my qualification level. • It led me to accept a job below my qualification level or with lower pay than expected. • It led me to take a job in a different field. • It encouraged me to continue or resume studies/training to meet recognition requirements. • It caused delays in starting a job. • It resulted in me missing a job opportunity. • It discouraged me from moving to or applying for a job opportunity in another EU country. • It led me to leave the EU / migrate elsewhere. • I am still in the process of obtaining recognition. • It had no significant impact on my situation. • Other (please specify)	Multiple choice – multiple answers
	41. Do you want to add anything about the qualification recognition process? If so, please write it below	• Free text	Free text
	42. Have you ever had your skills (e.g. from work experience or volunteering) officially validated in an EU country (i.e. have you requested and received a certificate or qualification from an official authority proving what you can do)?	• Yes • Plan to • No	Multiple choice – one answer

Section	Question	Answer	Response Type
	43. Are you aware that in some places it is possible to obtain an official certificate to show potential employers what you can do and what you have learnt outside of formal education (for example, while working or while volunteering)?	• Yes, I am aware that this exists, and I would know where to go if needed. • Yes, I am aware that this exists, but I would not know where to go if needed. • No, I have never heard about this.	Multiple choice – one answer
	44. In which country(ies) did you acquire this experience?	• List of EU countries	List
	45. What motivated you to have your skills validated?	• To provide proof of my skills to employers. • To improve my chances of getting a job. • To progress in my career or get better pay/working conditions. • To work in a regulated profession where proof of skills is required. • To access training for a skill that I need for my job. • Other (please specify)	Multiple choice – multiple answers
	46. Where did you look for information about how to do this?	• Official government websites • EU websites (e.g. Your Europe, Europass) • Social media or online forums • Friends/family or informal networks • Professional organisations or unions • Employer or recruiter • Recognition authorities / contact points • I didn't look for information • Other (please specify)	Multiple choice – multiple answers
	47. How clear was the information you found about the requirements for getting your skills validated?	• Very clear • Somewhat clear • Not clear • Not available / I couldn't find any	Multiple choice – one answer

Section	Question	Answer	Response Type
	48. Was support or assistance available during the process?	• Yes, and it was helpful. • Yes, but it was not helpful. • No support was available. • I did not seek any support.	Multiple choice – one answer
	49. How long did the validation process take from start (gathering all necessary documents) to finish (receiving a decision or final outcome)?	• ≤1 month • 1–3 months • 3–6 months • 6–12 months • 1–2 years • 2–3 years • More than 3 years • Don't know / Don't remember	Multiple choice – one answer
	50. Approximately how much did the validation process cost you overall (please estimate all fees and costs paid, including for translations, certifications and the application)?	• €0 • €1–250 • €251–500 • €501–1 000 • €1.001–€2.500 • More than €2.500 • Prefer not to say • Don't know / Don't remember • Not applicable	Multiple choice – one answer
	51. How did the process or outcome of the validation decision affect you?	• It allowed me to obtain a job that matched or exceeded my skill level. • It led me to take a job in a different field. • It encouraged me to undertake further training or education to strengthen or expand my skills. • It caused delays in starting a job. • It resulted in me missing a job or a training opportunity. • It discouraged me from moving to or applying for a job opportunity in another EU country. • It led me to leave the EU / migrate elsewhere.	Multiple choice – multiple answers

Section	Question	Answer	Response Type
		• I am still in the process of obtaining validation. • It had no significant impact on my situation. • Other (please specify)	
	52. Do you want to add anything about the process to have your work experience or other skills officially validated? If so, please write it below	• Free text	Free text
	53. When recruiting candidates from other countries, what sources of information do you use to identify their skills and qualifications, and do you trust these sources?	• I rely mainly on applicants' self-declared skills and qualifications (e.g. in their curriculum vitae or cover letter), even if I am not familiar with their country's education system or labour market. • I ask candidates to provide proof of their qualifications (e.g. copies of diplomas or certificates). • I generally trust credentials obtained from short training courses (e.g. micro-credentials). • I trust micro-credentials when I can identify the training provider, the learning outcomes, and how the credential was quality assured. • I trust credentials issued by an official authority that has assessed and certified (validated) the candidate's skills. • I ask candidates to have their skills validated (assessed and certified) by a competent authority. • I assess candidates' skills myself as part of the recruitment process (e.g. through competency-based interviews, tests, or assessment centres). • I contact previous employers for references or verification. • I always conduct interviews to assess candidates' attitude and potential. • Other (please specify)	Multiple choice – multiple answers

Section	Question	Answer	Response Type
	54. Are you aware that in some places there are official authorities that can assess and certify (validate) people's skills?	• Yes • No	Multiple choice – one answer
	55. Why do you ask candidates to get their foreign qualifications recognised by a competent authority in your country?	• Because the profession is regulated, and without official recognition, they are not legally allowed to work in this job, and I cannot hire them. • To better understand what candidates have learnt compared to people with a similar qualification in my country. • To verify that the qualification is authentic. • To determine the correct wage or pay category for the candidate. • To comply with requirements set by others (e.g. in a public tender, a subsidised contract, or a contract with another business). • To show appreciation and esteem that can contribute to talent retention. • Other (please specify):	Multiple choice – multiple answers
	56. If a recognition procedure is mandatory to access a specific profession or to stay/work in the country, do you, as an employer, handle the procedure, or do you leave it to the prospective employee?	• We (the employer) handle the recognition procedure on behalf of the employee. • We support the employee, but they are responsible for handling the procedure. • The prospective employee handles the procedure independently. • It depends on the case (please specify): • Don't know / Not applicable.	Multiple choice – one answer
	57. How long do formal recognition processes usually take from start (filing the application) to finish (receiving a decision)?	• ≤1 month • 1-3 months • 3-6 months • 6-12 months • 1-2 years • 2-3 years • More than 3 years • Don't know / Don't remember	Multiple choice – one answer

Section	Question	Answer	Response Type
	58. Approximately how much do formal recognition processes cost you overall (please estimate all fees and costs, including for translations, certifications and the application)?	• €0 • €1-250 • €251-500 • €501-1 000 • €1 001 - €2 500 • More than €2 500 • Prefer not to say • Don't know / Don't remember • Not applicable	Multiple choice – one answer
EU Tools	59. With which of the following EU tools supporting transparency and comparability of skills and qualifications are you familiar?	• European Qualifications Framework (EQF) • Europass Framework • European Skills, Competences, Qualifications and Occupations (ESCO) • European Quality Assurance in Vocational Education and Training (EQAVET) • Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) • European Credit Transfer and Accumulation System (ECTS) • Database of External Quality Assurance Results (DEQAR) • National Academic Recognition Information Centres in the European Union (NARIC) • European Digital Credentials for Learning (EDC) • Single Digital Gateway and Once-Only technical System (OOTS) • European Learning Model (ELM) • EU Digital Identity Wallet • Databases of qualifications from the National Qualifications Frameworks • Diploma Supplement and Certificate Supplement	Multiple choice – multiple answers
	60. Would you suggest changes to any of the above tools to enhance the portability of skills and qualifications in the single market? If so, please elaborate	• Free text	Free text

Section	Question	Answer	Response Type
EU Action	61. To what extent do you think EU-level action is necessary for the following objectives?	**Columns** • Very necessary • Somewhat necessary • Not very necessary • Not at all necessary **Rows** • To guarantee that qualifications are transparent and evenly understood across the EU. • To facilitate a common system of certification, so that knowledge and skills acquired through short training courses (e.g. micro-credentials) are understood throughout the EU. • To guarantee that people can get a certificate that demonstrates what they can do, and that this validation of skills certificate is issued in a common format throughout the EU. • To enhance the digitalisation and transnational sharing of qualifications in the EU. • To enhance the digitalisation and transnational sharing of skills credentials in the EU (for example, the certificate you get after an official authority has validated your skills, or a diploma). • To simplify, modernise and speed up administrative procedures for the recognition of qualifications across the EU. • To simplify the way in which people who have acquired qualifications or skills outside the EU can get them recognised in the EU so that they can access the EU labour market.	Matrix
	62. Please elaborate	• Free text	Free text

Section	Question	Answer	Response Type
	63. In your view, how important is it for your sector or country to attract skilled non-EU nationals to address current and future labour market needs?	• Very important • Important • Somewhat important • Not important • Not sure / No opinion	Multiple choice – one answer
	64. In your view, how important is it in your sector or country to equip workers and employers with reliable tools to identify and demonstrate a person's skills, regardless of how they acquired them (through work or study, etc.)?	• Very important • Important • Somewhat important • Not important • Not sure / No opinion	Multiple choice – one answer
	65. Please provide further details	• Free text	Free text
	66. Should new tools/policies/rules be introduced at EU level? Please provide as much detail as possible, including the needs these initiatives would address	• Free text	Free text
Possible EU-level solutions	67. Imagine a system where qualifications and training or skills certificates across the EU are issued as verifiable and transparent digital credentials that can be shared, understood and processed across borders. Do you think such a system would lead to cost savings or reductions in administrative burden for any of the groups below?	• Individuals / Job seekers • Employers • Education or training providers • Recognition bodies • Public administrations • Other	Multiple choice – multiple answers
	68. What concerns, if any, would you have about EU-level digital credentials for qualifications?	• Data privacy or security issues • Not being legally valid in all countries • Technical complexity or lack of compatibility between systems • Risk of excluding people with low digital skills or poor internet access • Costs of adopting or using the system • Doubts about who issues or verifies the credentials • Dependence on specific platforms or providers • None of the above • Other	Multiple choice – multiple answers

Section	Question	Answer	Response Type
	69. If EU-wide digital credentials for qualifications and skills were available, how likely would you be to use them and/or accept them if someone were to share them with you?	• Very likely • Somewhat likely • Somewhat unlikely • Very unlikely • Don't know	Multiple choice – one answer
	70. If the EU could improve or create new online/digital ways for people to show and share their qualifications, which changes do you think would help the most?	• Providing a database of qualification standards • Ensuring digital credentials work everywhere• Linking to a digital wallet • Uploading credentials in EU Digital Identity Wallet • Ensuring easy access • Making it easy for providers to issue credentials • Simple employer verification service • Clear guidance and help • Other	Multiple choice – multiple answers
	71. Would any of these situations make your process for recruiting people from another country easier and cheaper?	• Access to detailed qualification information • Translated information • Digital credentials• Recognition statements • Micro-credentials in EU format • Skills validation credentials • Shorter waiting times (recognition) • Shorter waiting times (permits) • Other	Multiple choice – multiple answers
	72. If you wish to add further information - within the scope of this consultation - please do so here	• Free text	Free text
	73. Several focus groups will be organised as part of this initiative's consultation process, and we would welcome your participation. Would you like to be invited to one of these focus groups?	• Yes • No • Maybe	Multiple choice – one answer

Annex 15. Further evidence on the assessment of the impacts of POs

Annex 15.1 Assessment of PO 0: Baseline scenario

Type of impacts	Summary of assessment
Social	Under the baseline scenario, no additional measures are introduced to address the structural barriers affecting the recognition of qualifications and validation of skills of TCNs, as identified in Section 4. As a result, the current limitations of the system - including fragmented procedures, limited transparency, lengthy processes and uneven implementation across Member States - are expected to persist over time, without significant improvement in social outcomes. From a social perspective, effective recognition and validation systems are important enablers of labour market integration, access to regulated professions, social inclusion and the fuller use of individuals' skills and experience. They can also support faster settlement, economic independence and broader participation in host societies. Data from the Public Consultation show that the prevailing motivation among TCNs and EU citizens with third-country qualifications - whether they had already initiated a recognition process or were planning to do so - was the desire to improve their chances of finding a job matching their qualification level. To a slightly lesser but still significant extent, the prospect of career advancement or better pay and working conditions also emerged as a key driver. For a minority of respondents, composed entirely of TCNs, the need to obtain a visa or a residence or work permit also played a role in their decision.[609] However, the evidence in the report indicates that many TCNs currently face difficulties in translating their qualifications and skills into employment opportunities that match their profile. In the absence of intervention, the baseline scenario is not expected to significantly improve the accessibility or fairness of current systems. Existing barriers linked to documentation requirements, procedural complexity, costs, language issues and lack of clear information are likely to remain relevant in many Member States. In particular: • TCNs are likely to continue facing obstacles in accessing employment opportunities corresponding to their qualifications and experience; • risks of underemployment, deskilling and "brain waste" are expected to persist, where individuals are unable to make full use of their competences; • disparities in access to recognition and validation procedures across Member States may remain, reflecting differences in administrative capacity, governance models and national labour market structures; • sectors and communities that could benefit socially from faster labour market integration of qualified migrants may continue to experience unmet needs. For employers and service users, especially in sectors such as healthcare, education or technical professions, continued barriers may indirectly affect the availability of qualified workers and therefore access to services. However, these effects are expected to remain broadly in line with current conditions rather than materially worsen as a result of the baseline scenario. During the focus group, most representatives of professional organisations stressed that difficulties related to the recognition of qualifications have a significant impact on the recruitment of TCNs, affecting it to a large or moderate extent[610]. This suggests that existing inefficiencies in recognition systems already have tangible social consequences in terms of labour market integration and workforce availability. This is further supported by stakeholder opinions on recruitment impacts. A large majority of representatives of professional organisations participating in the focus group indicated that recognition procedures frequently or very frequently delay the hiring of qualified third-country professionals.[611] This suggests that current procedural bottlenecks have a material effect on access to employment and the timely integration of qualified workers into EU labour markets Evidence from the focus groups with representatives of professional organisations highlighted that a particularly significant worsening is expected in the transport sector. Stakeholders highlighted that the EU already faces a shortage of around half a million drivers, combined with an ageing

[609] PC Results: What motivated you to have your qualification recognised? (n=84); in European Commission (2026). *Study Supporting an Impact Assessment of EU rules for the recognition of qualifications and validation of skills of third country nationals. Public Consultation Analysis*.
[610] Focus Group of 17 March 2026 with representatives of professional organisations. Poll Q: "To what extent do difficulties with recognition of qualifications affect recruitment of third-country nationals in your sector?".
[611] Ibid. Poll Q: How often do recognition procedures delay hiring of qualified third-country professionals?".

Type of impacts	Summary of assessment
	workforce and difficulties attracting new entrants. Entry barriers linked to licence requirements, age thresholds and the acquisition or recognition of Certificates of Professional Competence (CPCs) further restrict labour supply.[612] Under the baseline scenario, these shortages are likely to intensify. Moreover, given the essential role of transport in the movement of goods and the delivery of key services, persistent shortages may also create wider negative social effects, including reduced connectivity and supply disruptions. Finally, testimonies of TCNs during the focus group pointed to the limited recognition of informal learning, work experience and modular competences,[613] suggesting that in the absence of more flexible tools, many existing skills may continue to remain unused. This concern is further corroborated by the evidence collected through the Public Consultation, where stakeholders consistently emphasise that recognition systems for TCNs remain predominantly centred on formal qualifications, while competences acquired through non-formal and informal pathways continue to be insufficiently acknowledged. Notably, 44% of respondents identified the inadequate validation of non-formal and informal learning as a major gap in current recognition systems.[614] In line with these findings, a large majority of TCNs reported that employers either did not recognise or only partially recognised skills acquired in a third country.[615] These barriers frequently translate into situations of overqualification or difficulties in filling vacancies, pointing to a broader inefficiency in the allocation of human capital[616].Moreover, where applicants come from conflict-affected countries, such barriers may be more acute due to disrupted documentation pathways and reduced familiarity with host-country administrative systems[617]. This may increase the risk of underemployment, delayed economic independence and slower integration into host societies. In addition, individual testimonies of TCNs indicated that recognition outcomes that do not reflect applicants' expected qualification level may directly affect professional identity and access to adequate employment.[618] Overall, the baseline scenario is therefore expected to have no significant impact (rate: 0) on social outcomes, reflecting the persistence of existing barriers and the absence of structural improvement in access, inclusion and skills utilisation.
Economic	Under the baseline scenario, no additional measures are introduced to address the structural barriers affecting the recognition of qualifications and validation of skills of TCNs, as identified in Section 4. As a result, the current economic inefficiencies associated with fragmented procedures, lengthy processing times, limited transparency and uneven implementation across Member States are expected to persist over time, without significant improvement in labour market or productivity outcomes. From an economic perspective, effective recognition and validation systems are important to facilitate labour market matching, improve the allocation of skills, support productivity growth and help employers access qualified workers from outside the EU. They are particularly relevant in the context of demographic ageing, labour shortages and increasing competition for global talent. However, the evidence presented in Section 4 indicates that existing barriers reduce the capacity of TCNs to enter employment rapidly and at the appropriate qualification level, while also limiting the ability of employers to fill vacancies efficiently. This is also confirmed by the Public Consultation results, where many respondents reported negative impacts of the recognition process or its outcome, in particular noting missed job opportunities, the need to accept jobs below their qualification level or expected pay, and delays in starting employment[619]. In the absence of intervention, the baseline scenario is not expected to significantly improve the contribution of recognition systems to labour market functioning or competitiveness. In particular:

[612] Ibid. Open discussion on Q: "If no EU action were taken, how would attraction and recruitment of third country nationals in your sector evolve over the next five years?".
[613] Focus Group of 19 March 2026 with TCNs.
[614] PC results, Q25: Do you think there are other issues that make it harder for people to have their skills and qualifications understood, recognized and valued in another country? (n=449), in European Commission (2026). *Study Supporting an Impact Assessment of EU rules for the recognition of qualifications and validation of skills of third country nationals. Public Consultation Analysis*.
[615] PC Results. Q30: To what extent were the skills that you acquired in a different country accepted by employers (your previous works or volunteering experience, for example)? (n=51); in European Commission (2026). *Study Supporting an Impact Assessment of EU rules for the recognition of qualifications and validation of skills of third country nationals. Public Consultation Analysis*.
[616] PC Results. Q31: How did this affect how well your job matched your level of skills (what you can do based, for example, in your previous work experience)? (n=51); in European Commission (2026). *Study Supporting an Impact Assessment of EU rules for the recognition of qualifications and validation of skills of third country nationals. Public Consultation Analysis*.
[617] Ibid. Open discussion on Q: "To what extent have you experienced any difficulties to get your qualifications recognised in the EU?".
[618] Ibid. Open discussion on Q: "How long did the recognition process take in your case?".
[619] PC Results: How did the process or outcome of the recognition decision affect you? (n=31); in European Commission (2026). *Study Supporting an Impact Assessment of EU rules for the recognition of qualifications and validation of skills of third country nationals. Public Consultation Analysis*.

Type of impacts	Summary of assessment
	• employers are likely to continue facing difficulties in recruiting qualified TCNs in a timely and predictable manner, especially in shortage occupations and highly regulated sectors; • labour and skills shortages may persist, including in sectors such as healthcare, engineering, construction, ICT and other professions where recognition can be a gateway to employment; • inefficiencies in skills allocation are expected to remain, where qualified individuals work below their competence level or face delayed labour market entry; • productivity gains associated with faster integration and better use of migrant skills may remain unrealised. For CAs, the absence of reform means that current administrative models and resource needs are likely to remain broadly unchanged, with costs driven mainly by demand volumes rather than structural efficiency gains. Evidence from the focus group with employers and labour market stakeholders highlighted that lengthy or unpredictable procedures can delay hiring decisions, increase recruitment costs and reduce the attractiveness of the EU compared with competing destinations.[620] The healthcare focus group also underlined that faster access of qualified professionals could help alleviate persistent workforce shortages.[621] While economic conditions, migration flows and national reforms may influence outcomes over time, these developments would arise mainly from external drivers rather than improvements generated by the baseline scenario itself. Overall, the baseline scenario is therefore expected to have no significant impact (rate: 0) on economic outcomes, reflecting the persistence of existing labour market frictions and the absence of structural improvement in skills utilisation, recruitment efficiency and competitiveness.
Fundamental rights	Under the baseline scenario, no additional measures are introduced to address the structural barriers affecting the recognition of qualifications and validation of skills of TCNs, as identified in Section 4. As a result, the current limitations of the system are expected to persist over time, without significant improvement in the practical exercise of rights linked to access to employment, fair treatment and integration within the EU labour market. From a fundamental rights perspective, recognition and validation procedures are closely connected to the effective enjoyment of several rights and principles, including equality before the law, non-discrimination, fair and transparent administrative treatment, access to employment opportunities, and, where relevant, the ability to pursue an occupation under national law. For TCNs legally residing in the EU, these procedures can be an important gateway to exercising such rights in practice. While the existing EU and national legal framework already provide safeguards in these areas, the evidence in the report indicates that fragmented procedures, unclear information, lengthy timelines and uneven implementation may continue to limit the accessibility and predictability of recognition systems in practice. In the absence of intervention, these barriers are expected to remain. In this sense, the baseline scenario is not expected to significantly improve the practical conditions under which relevant rights are exercised. In particular: • TCNs may continue to face difficulties in accessing recognition or validation pathways in a timely and transparent manner; • differences in procedures and implementation across Member States may continue to affect consistency and predictability of treatment; • existing gaps between formal rights and their effective exercise in practice may persist, particularly where administrative complexity or lack of information creates practical obstacles; • individuals whose qualifications are not effectively recognised may continue facing barriers to equal labour market participation. For employers, the impact on fundamental rights is indirect, but clearer and fairer procedures can affect equal access to opportunities and labour market participation more broadly. Evidence from the focus group with individual TCNs highlighted difficulties linked to understanding procedures, gathering documentation, costs and delays, all of which can affect the practical ability to access opportunities matching their qualifications[622]. The focus group on information provision also stressed the importance of accessible and transparent systems for ensuring fair treatment.[623] During the focus group with ENIC-NARIC centres, PES and CSOs, CSOs highlighted that refugees in particular face additional and specific challenges in the recognition process. It was noted that

[620] Focus Group of 17 March 2026 with representatives of professional organisations.
[621] Focus Group of 13 March 2026 with CAs and EU professional organisations in the healthcare sector.
[622] Focus Group of 19 March 2026 with TCNs.
[623] Focus Group of 04 March 2026 on information to TCNs with ENIC NARIC Centres, PES, and CSOs.

Type of impacts	Summary of assessment
	existing information and support tools are often designed for international students and therefore do not adequately reflect the situation of forcibly displaced persons, especially when documentation is missing or studies have been interrupted.[624] This can create additional barriers to equal access to recognition procedures and, consequently, to the effective enjoyment of related rights in practice. Overall, while the baseline scenario does not introduce any new limitations on rights, it does not remove the existing practical barriers affecting their effective exercise. It is therefore expected to have no significant impact (rate: 0) on fundamental rights, reflecting the persistence of current obstacles and the absence of structural improvement.

[624] Focus Group of 04 March 2026 on information to TCNs with ENIC NARIC Centres, PES, and CSOs. Breakout room with PES-CSOs, open discussion on Q: “To what extent do you provide information and support to TCNs regarding on the validation of skills of TCNs?”.

Annex 15.2 Assessment of PO 1: Soft coordination and digital support

Type of impacts	Summary of assessment
Social	Under Policy Option 1, a set of non-legislative measures is introduced to improve information provision, promote mutual learning, encourage more user-friendly procedures and strengthen trust in third-country qualifications. These include improved EU-level information for individuals and employers (B7), guidance on procedural steps and indicative timelines (B8), recommendations on proportionate documentation requirements (B9), benchmarking and exchange of good practices (B1–B5), and measures supporting authenticity checks, transparency and pre-departure preparation (B11–B15). As highlighted in Section 4, recognition and validation systems can play an important role in supporting labour market integration, social inclusion and fuller use of the qualifications and experience of TCNs. However, fragmented procedures, lack of transparency, delays and burdensome requirements currently limit these outcomes in many Member States. Policy Option 1 is expected to improve these conditions, but only to a limited extent. For TCNs, clearer information and more accessible guidance may help individuals better understand available pathways, prepare documentation earlier and navigate procedures with greater confidence. In some Member States, benchmarking and mutual learning may encourage more inclusive administrative practices and better user support. Pre-departure assistance under Talent Partnerships may also improve preparedness before arrival. These changes may support faster access to employment matching qualifications, reduce periods of inactivity or underemployment, and modestly lower risks of deskilling or “brain waste”. For employers and service users, especially in sectors experiencing shortages such as healthcare, even limited improvements in recognition systems may help facilitate the integration of qualified workers and improve access to services over time. For CAs, peer learning and better guidance may encourage more transparent and user-oriented systems, which can strengthen trust and accessibility. Evidence from the focus group with individual TCNs highlighted difficulties linked to unclear procedures, delays, lack of practical support and challenges in using qualifications effectively[625]. The healthcare focus group also stressed the social relevance of facilitating access of qualified professionals to occupations facing shortages[626]. However, the overall social impact is expected to remain limited because the measures are voluntary and do not create binding procedural rights, common deadlines or enforceable simplification standards. Outcomes are therefore likely to vary significantly depending on national uptake and implementation. As a result, Policy Option 1 may improve social outcomes in some Member States and sectors but is unlikely to eliminate the structural barriers identified in Section 4 across the EU as a whole. Overall, Policy Option 1 is therefore expected to have a limited positive social impact (rate: +1).

[625] Focus Group of 19 March 2026 with TCNs.
[626] Focus Group of 13 March 2026 with CAs and EU professional organisations in the healthcare sector.

Type of impacts	Summary of assessment
Economic	Under Policy Option 1, a set of non-legislative measures is introduced to improve information provision, encourage more efficient procedures and strengthen trust in third-country qualifications. These include improved EU-level information for applicants and employers (B7), guidance on procedural steps and indicative timelines (B8), recommendations on documentation and translation requirements (B9), guidance on fees (B10), benchmarking and mutual learning (B1–B5), and measures supporting authenticity checks, comparability and pre-departure preparation (B11–B15). As highlighted in Section 4, effective recognition and validation systems can contribute to better labour market matching, more efficient use of skills, faster labour market entry and improved access for employers to qualified workers from outside the EU. However, current fragmentation, delays and uncertainty reduce these economic benefits. Policy Option 1 is expected to improve these conditions, but only to a limited extent. For employers, especially in sectors affected by labour and skills shortages, clearer information and somewhat more predictable procedures may support recruitment planning and increase willingness to recruit TCNs through formal channels. This may be particularly relevant for SMEs and employers less familiar with national recognition systems. For TCNs, better guidance and more transparent procedures may facilitate earlier labour market entry and improve the likelihood of working in occupations more closely matched to their qualifications. This may reduce underemployment and support higher productivity through better use of existing skills. This is further supported by the results of the Public Consultation: the main reasons reported by the TCNs and EU citizens with third-country qualifications for validating their skills primarily relate to improving their chances of securing employment but also supporting career progression and improving working conditions and pay.[627] For CAs, benchmarking, peer learning and common templates may modestly improve administrative efficiency and case handling practices, potentially lowering processing times or reducing avoidable workload in some Member States. Evidence from the focus group with employers and labour market stakeholders indicated that complex or lengthy recognition procedures can delay recruitment, increase vacancy costs and reduce the attractiveness of the EU compared with competing destinations.[628] The healthcare focus group also highlighted the economic relevance of facilitating faster access of qualified professionals to shortage occupations.[629] However, the overall economic impact is expected to remain limited because Policy Option 1 does not introduce binding deadlines, common procedural guarantees or structural reforms capable of substantially reducing labour market frictions across the EU. Effects are likely to depend on voluntary uptake by Member States and may therefore remain uneven. As a result, Policy Option 1 may generate modest gains in recruitment efficiency, labour market integration and skills utilisation, but is unlikely to fully address the structural inefficiencies identified in Section 4. Overall, Policy Option 1 is therefore expected to have a limited positive economic impact (rate: +1).

[627] PC Results. Q45: What motivated you to have your skills validated? (n=31); in European Commission (2026). *Study Supporting an Impact Assessment of EU rules for the recognition of qualifications and validation of skills of third country nationals. Public Consultation Analysis*. What motivated you to have your skills validated? (n=31).
[628] Focus Group of 17 March 2026 with representatives of professional organisations.
[629] Focus Group of 13 March 2026 with CAs and EU professional organisations in the healthcare sector.

Type of impacts	Summary of assessment
Fundamental rights	Under Policy Option 1, a set of non-legislative measures is introduced to improve transparency, accessibility and understanding of recognition and validation procedures for TCNs. These include improved EU-level information for applicants and employers (B7), guidance on procedural steps and indicative timelines (B8), recommendations on documentation and translation requirements (B9), guidance on fees (B10), benchmarking and exchange of good practices (B1–B5), and measures supporting trust and comparability of third-country qualifications (B11–B15). As highlighted in Section 4, recognition and validation procedures are closely linked to the effective enjoyment of several rights and principles, including equal treatment, fair and transparent administrative processes, access to employment opportunities, and the practical ability to use one's qualifications and skills in the labour market. While the existing legal framework already provides safeguards, current fragmentation, lack of clarity and procedural complexity may limit the effective exercise of these rights in practice. Policy Option 1 is expected to improve these practical conditions to a limited extent. For TCNs, clearer information and better guidance may make procedures easier to understand and more accessible. Recommendations on documentation, fees and timelines may encourage more proportionate administrative practices in some Member States, thereby improving predictability and fairness. For CAs, benchmarking and peer learning may promote more transparent and user-oriented administrative behaviour, while stronger trust and comparability tools may support more consistent treatment of applicants. For employers, the impact on fundamental rights is indirect, but clearer and fairer systems may contribute to more equal access to labour market opportunities and smoother integration pathways. Evidence from the focus group with individual TCNs[630] highlighted difficulties linked to unclear procedures, costs, delays and practical obstacles to using qualifications effectively. The focus group on information provision also underlined the importance of accessible and understandable systems for fair treatment of applicants.[631] However, the overall impact is expected to remain limited because the measures are voluntary and do not create binding procedural rights, common minimum standards or enforceable guarantees across Member States. Differences in administrative practice and access conditions are therefore likely to persist. As a result, Policy Option 1 may improve the practical enjoyment of relevant rights in some Member States but is unlikely to fully eliminate the barriers identified in Section 4 across the EU. Overall, Policy Option 1 is therefore expected to have a limited positive impact (rate: +1) on fundamental rights.

[630] Focus Group of 19 March 2026 with TCNs. Focus Group of 04 March 2026 on information to TCNs with ENIC NARIC Centres, PES, and CSOs

[631] Focus Group of 04 March 2026 on information to TCNs with ENIC NARIC Centres, PES, and CSOs.

Annex 15.3 Assessment of PO 2: Targeted legislative changes and digital improvements

Type of impacts	Summary of assessment
Social	Under Policy Option 2, binding common measures are introduced to simplify procedures, improve coordination and strengthen trust in qualifications and skills obtained in third countries. These include common procedural rules and coordination requirements (A1–A3), procedural guarantees and deadlines (A4), common documentation rules (A5), multilingual document acceptance (A6), proportionate fee principles (A7), and common tools supporting authenticity checks and comparability (A8–A10). As highlighted in Section 4, effective recognition and validation systems are important enablers of labour market integration, social inclusion and fuller use of the qualifications and experience of TCNs. This is supported by the ENIC NARIC survey results: when asked to what extent an EU intervention in this field would generate specific socio-economic impacts, 44.4% of respondents indicated that it would improve the integration of TCNs and overall social cohesion "to a large extent", increasing to 72.2% when including those who selected "to a moderate extent"[632].However, current fragmentation, delays, lack of transparency and burdensome procedures can hinder these outcomes. Policy Option 2 is expected to improve them to a moderate extent, more consistently than Policy Option 1. For TCNs, clearer and more predictable procedures may facilitate faster access to employment corresponding to qualifications and experience. Reduced administrative burdens and lower costs may improve access for applicants who are currently discouraged by complex systems. This may help reduce inactivity, underemployment and deskilling. For employers and service users, especially in sectors facing shortages such as healthcare, education, engineering or technical occupations, faster integration of qualified workers may improve workforce availability and access to services. For CAs, more coherent systems may support fairer and more transparent treatment of applicants, strengthening trust in public administration. Evidence from focus groups consistently highlighted the social relevance of reform. Individual TCNs referred to delays, lack of clarity and difficulties in using their qualifications effectively.[633] Healthcare stakeholders stressed the need to facilitate access of qualified professionals to shortage occupations[634]. Stakeholders also underlined the human capital loss created when qualified professionals are required to repeat entire programmes or remain inactive for long periods while recognition is pending.[635] Compared with Policy Option 1, the expected impact is stronger because the measures are binding and therefore more likely to generate broad-based improvements across Member States rather than isolated progress. However, impacts are expected to remain moderate rather than transformative. Broader barriers linked to language requirements, labour market integration, discrimination or migration status would still affect outcomes and lie partly outside the scope of recognition rules alone. Overall, Policy Option 2 is therefore expected to have a moderate positive social impact (rate: +2).

[632] EU Survey to ENIC NARIC. Q36: To what extent would an EU intervention in the field bring the following social and economic impacts? (n=18).
[633] Focus Group of 19 March 2026 with TCNs.
[634] Focus Group of 13 March 2026 with CAs and EU professional organisations in the healthcare sector.
[635] Focus Group of 14 April 2026 on quality assurance and automatic recognition.

Type of impacts	Summary of assessment
Economic	Under Policy Option 2, binding common measures are introduced to simplify procedures, improve coordination and strengthen trust in qualifications and skills obtained in third countries. These include common procedural rules and coordination requirements (A1–A3), procedural guarantees and deadlines (A4), common documentation rules (A5), multilingual document acceptance (A6), proportionate fee principles (A7), and common tools for authenticity checks and comparability (A8–A10). As highlighted in Section 4, efficient recognition and validation systems are important for improving labour market matching, supporting productivity, reducing skills shortages and enabling employers to access qualified workers from outside the EU. Current fragmentation, delays and uncertainty limit these benefits. Policy Option 2 is expected to improve economic outcomes to a moderate extent, with broader and more consistent effects than Policy Option 1. For employers, especially in sectors facing persistent shortages such as healthcare, construction, engineering, ICT and other regulated professions, clearer and faster procedures may improve recruitment planning, reduce vacancy durations and widen access to qualified talent from third countries. For TCNs, quicker and more predictable recognition may facilitate earlier labour market entry and improve the likelihood of employment at a level corresponding to qualifications and skills. This may reduce overqualification and support stronger productivity through better use of human capital. For CAs, common procedural rules and shared trust tools may improve administrative efficiency, reduce repetitive case handling and lower transaction costs linked to fragmented systems. Evidence from focus groups supports this assessment. Employers highlighted that lengthy and uncertain procedures can delay hiring, increase recruitment costs and reduce the attractiveness of the EU compared with competing destinations.[636] Healthcare stakeholders stressed the importance of faster access of qualified professionals to shortage occupations[637]. Stakeholders further referred to inefficiencies such as requiring partial retraining gaps to trigger full programme repetition and difficulties recognising specialised doctors despite labour demand[638]. Compared with Policy Option 1, the expected impact is stronger because the measures are binding and therefore more likely to generate consistent reductions in labour market frictions across Member States. However, impacts are expected to remain moderate rather than transformative. Labour demand conditions, wage differentials, language requirements, migration rules and profession-specific licensing conditions would continue to influence outcomes. Overall, Policy Option 2 is therefore expected to have a moderate positive economic impact (rate: +2).

[636] Focus Group of 17 March 2026 with representatives of professional organisations.
[637] Focus Group of 13 March 2026 with CAs and EU professional organisations in the healthcare sector.
[638] Focus Group of 14 April 2026 on quality assurance and automatic recognition.

Type of impacts	Summary of assessment
Fundamental rights	Under Policy Option 2, binding common measures are introduced to simplify procedures, improve transparency and strengthen trust in recognition and validation systems for qualifications and skills obtained in third countries. These include common procedural rules and coordination requirements (A1–A3), procedural guarantees and deadlines (A4), common documentation rules (A5), multilingual document acceptance (A6), proportionate fee principles (A7), and common tools supporting authenticity checks and comparability (A8–A10). As highlighted in Section 4, recognition and validation procedures are closely linked to the practical enjoyment of several rights and principles, including fair and transparent administrative treatment, equality of opportunity, access to employment, and the effective ability to make use of one's qualifications and skills. Current fragmentation, delays, unclear requirements and uneven practices may limit the effective exercise of these rights in practice. Policy Option 2 is expected to improve these conditions to a moderate extent. For TCNs, clearer procedures, binding timelines and more proportionate documentation requirements may strengthen legal certainty, accessibility and fairness. Lower administrative burdens and more transparent fee structures may also improve practical access to recognition pathways. For CAs, common procedural standards may support more consistent treatment of applicants across Member States, while preserving national decision-making powers. Stronger trust and comparability tools may also reduce arbitrary variation linked to lack of information. For employers, the impact on fundamental rights is indirect, but clearer and fairer systems may improve equal access to labour market opportunities and facilitate more inclusive recruitment pathways. Evidence from focus groups supports this assessment. Individual TCNs referred to difficulties linked to unclear procedures, costs, delays and obstacles to using their qualifications effectively.[639] Information-focused stakeholders stressed the importance of accessible and understandable systems for fair treatment.[640] Participants also highlighted the importance of fair, transparent and non-discriminatory recognition approaches, while respecting the diversity of education systems.[641] Compared with Policy Option 1, the expected impact is stronger because the measures are binding and more likely to ensure consistent minimum procedural safeguards across Member States. However, impacts are expected to remain moderate rather than complete. Broader barriers linked to language requirements, labour market discrimination, migration status or profession-specific restrictions would still affect outcomes and lie partly outside the scope of recognition rules alone. Overall, Policy Option 2 is therefore expected to have a moderate positive impact (rate: +2) on fundamental rights.

[639] Focus Group of 19 March 2026 with TCNs.
[640] Focus Group of 04 March 2026 on information to TCNs with ENIC NARIC Centres, PES, and CSOs.
[641] Focus Group of 14 April 2026 on quality assurance and automatic recognition.

Annex 15.4 Assessment of PO 3: Comprehensive reform and digital by default

Type of impacts	Summary of assessment
Social	Under Policy Option 3, the common procedural improvements introduced under Policy Option 2 are complemented by automatic or highly facilitated recognition pathways for selected professions, supported by trusted review mechanisms and stronger comparability tools. As highlighted in Section 4, recognition and validation systems play a central role in labour market integration, social inclusion and the effective use of qualifications and experience of TCNs. Current delays, fragmented procedures and uncertainty can lead to prolonged inactivity, underemployment and deskilling. Policy Option 3 is expected to generate the strongest positive social impacts among the options. For TCNs, substantially faster and more predictable recognition pathways may improve access to employment matching their qualifications and skills, reduce periods of inactivity and strengthen long-term labour market integration. This may be particularly relevant for regulated professions where current barriers are highest. For employers and service users, especially in sectors facing shortages such as healthcare, education or technical professions, quicker mobilisation of qualified workers may improve service continuity and access. For CAs, more efficient systems may strengthen perceptions of fairness, transparency and responsiveness, contributing to greater trust in public administration. Evidence across focus groups supports this assessment. TCNs highlighted the social consequences of delays and inability to use qualifications effectively.[642] Healthcare stakeholders stressed the need to facilitate access of qualified professionals to shortage occupations.[643] Employers noted the operational impact of unfilled vacancies.[644] Participants further referred to the waste of human capital when nurses, doctors and other qualified professionals remain blocked in lengthy procedures or are required to repeat extensive training despite limited gaps.[645] Compared with Policy Option 2, the impact is expected to be stronger because Policy Option 3 not only improves procedures but, for selected professions, fundamentally changes recognition outcomes through automatic or highly facilitated access. However, impacts would be strongest in professions covered by the scheme. Broader barriers linked to language, migration status, discrimination or local labour market conditions would still affect outcomes. Overall, Policy Option 3 is therefore expected to have a significant positive social impact (rate: +3).

[642] Focus Group of 19 March 2026 with TCNs.
[643] Focus Group of 13 March 2026 with CAs and EU professional organisations in the healthcare sector.
[644] Focus Group of 17 March 2026 with representatives of professional organisations.
[645] Focus Group of 14 April 2026 on quality assurance and automatic recognition.

Type of impacts	Summary of assessment
Economic	Under Policy Option 3, the common procedural improvements introduced under Policy Option 2 are complemented by automatic or highly facilitated recognition pathways for selected professions, supported by trusted review mechanisms and stronger comparability tools. As highlighted in Section 4, efficient recognition and validation systems are important for improving labour market matching, reducing skills shortages, increasing productivity and enabling employers to access qualified workers from outside the EU. The results of the Public Consultation further support this assessment, as respondents strongly emphasised the strategic importance of attracting skilled non-EU nationals. A large majority consider this very important or important for their sector or country, reflecting widespread recognition of the role that TCNs can play in addressing current and future labour market needs.[646] Positive economic impacts of an EU intervention in this field emerge also from the ENIC NARIC survey results, where respondents report expected beneficial effects across several dimensions in particular, 77.8% indicate that such an intervention would improve the capacity of EU employers, including SMEs, to attract highly skilled workers at least to a moderate extent (22.2% “to a large extent” and 55.6% “to a moderate extent”). The same share also expects improvements in labour mobility within the EU (22.2% “to a large extent” and 55.6% “to a moderate extent”). Similarly, 77.7% foresee a positive impact on the EU labour market’s ability to address labour and skills shortages in critical sectors (44.4% “to a large extent” and 33.3% “to a moderate extent”). Broader effects are also identified in terms of increasing EU competitiveness (27.8% “to large extent”, 44.4% “to a moderate extent”) and improving the quality of work (33.3% “to a large extent”, 27.8% “to a moderate extent”).[647] Current delays, fragmented procedures and uncertainty reduce these benefits. Policy Option 3 is expected to generate the strongest positive economic impacts among the options. For employers, especially in sectors facing persistent shortages such as healthcare, construction, engineering, ICT and other regulated professions, substantially faster and more predictable recognition may widen access to qualified talent, reduce vacancy durations and improve workforce planning. For TCNs, quicker recognition and better matching between qualifications and occupations may support earlier labour market entry, higher earnings potential and more productive use of existing human capital. For CAs, the reduction of routine case-by-case assessments for professions within scope may improve administrative efficiency and allow resources to be redirected towards complex cases, enforcement or quality control. Evidence across focus groups supports this conclusion. Employers highlighted that lengthy and uncertain recognition procedures delay hiring, increase recruitment costs and reduce the attractiveness of the EU compared with competing destinations.[648] Healthcare stakeholders stressed the importance of faster access of qualified professionals to shortage occupations.[649] TCNs referred to delayed labour market entry and inability to use qualifications effectively.[650] Participants also referred to inefficiencies such as highly qualified professionals repeating extensive training despite limited gaps and difficulties recognising specialised doctors despite labour demand.[651] Compared with Policy Option 2, the impact is expected to be stronger because Policy Option 3 not only improves procedures but creates more direct access routes for selected professions, thereby reducing labour market frictions more substantially. However, impacts would be concentrated in professions and countries covered by the scheme. Wage conditions, language requirements, migration rules and broader labour market dynamics would continue to influence outcomes. Overall, Policy Option 3 is therefore expected to have a significant positive economic impact (rate: +3).

[646] PC Results. In your view, how important is it for your sector or your country to attract skilled non-EU nationals to address current and future labour market needs? (n=486); in European Commission (2026). *Study Supporting an Impact Assessment of EU rules for the recognition of qualifications and validation of skills of third country nationals. Public Consultation Analysis*.
[647] EU Survey to ENIC NARIC. Q36: To what extent would an EU intervention in the field bring the following social and economic impacts? (n=18)
[648] Focus Group of 17 March 2026 with representatives of professional organisations.
[649] Focus Group of 13 March 2026 with CAs and EU professional organisations in the healthcare sector.
[650] Focus Group of 19 March 2026 with TCNs.
[651] Focus Group of 14 April 2026 on quality assurance and automatic recognition.

Type of impacts	Summary of assessment
Fundamental rights	Under Policy Option 3, the common procedural safeguards introduced under Policy Option 2 are complemented by automatic or highly facilitated recognition pathways for selected professions, supported by trusted review mechanisms, stronger comparability tools and structured quality-assurance arrangements. As highlighted in Section 4, recognition and validation procedures are closely linked to the practical enjoyment of several rights and principles, including fair and transparent administrative treatment, equality of opportunity, access to employment, and the effective ability to use one's qualifications and skills. Current fragmentation, lengthy procedures, unclear requirements and uneven practices may limit the practical exercise of these rights. Policy Option 3 is expected to generate the strongest positive impacts among the options. For TCNs, substantially clearer, faster and more predictable pathways may strengthen effective access to recognition systems and reduce barriers that currently prevent individuals from using their qualifications in practice. For eligible professions, automatic or highly facilitated recognition may significantly improve legal certainty and equal access to professional opportunities. For CAs, common trust frameworks and clearer procedural architecture may support more consistent treatment of comparable applicants across Member States, while preserving necessary safeguards linked to public interest objectives. For employers, the impact on fundamental rights is indirect, but fairer and more transparent systems may improve equal access to labour market opportunities and contribute to more inclusive recruitment pathways. Evidence across focus groups supports this assessment. TCNs referred to practical obstacles, delays and costs that hinder use of their qualifications.[652] Information-focused stakeholders stressed the importance of transparent and understandable systems for fair treatment.[653] Healthcare and labour market stakeholders highlighted the social fairness dimension of allowing qualified professionals to contribute where shortages exist.[654] Participants further stressed the importance of objective, quality-based and non-discriminatory recognition approaches grounded in trusted evidence.[655] Compared with Policy Option 2, the impact is expected to be stronger because Policy Option 3 not only improves procedural safeguards but, for selected professions, substantially reduces practical barriers to access. However, impacts would remain strongest in professions within scope. Broader barriers linked to language requirements, migration status, labour market discrimination or sector-specific restrictions would still influence outcomes. Overall, Policy Option 3 is therefore expected to have a significant positive impact (rate: +3) on fundamental rights.

[652] Focus Group of 19 March 2026 with TCNs.
[653] Focus Group of 04 March 2026 on information to TCNs with ENIC NARIC Centres, PES, and CSOs.
[654] Focus Group of 13 March 2026 with CAs and EU professional organisations in the healthcare sector.
[655] Focus Group of 14 April 2026 on quality assurance and automatic recognition.

Annex 16. Assessment of the impacts of Pos across evaluation criteria

Annex 16.1 Assessment of PO 0: Baseline scenario

Criteria	Rate	Summary of assessment
Effectiveness	0	*Specific Objective 1: Streamlining recognition and validation processes between and within Member States* Under the baseline scenario, no additional EU measures are introduced to reduce the heterogeneity and fragmentation of procedures for the recognition of qualifications and validation of skills of TCNs. Recognition and validation remain organised primarily at Member State level, with procedures differing across countries, sectors, professions and authorities. As described in the policy options section, the current framework is characterised by separate legal bases, different authorities, different timelines and limited coordination between recognition, migration and employment systems. Evidence from the focus group with CAs indicates that, while some Member States are undertaking national efforts to improve or streamline specific procedures, these initiatives remain largely isolated. They tend to be sector-specific and do not translate into broader convergence or systemic harmonisation across the EU[656].At the same time, individual testimony from TCNs suggests that fragmented systems may also lead to partial or downgraded recognition of qualifications, where higher-level qualifications are recognised only at a lower occupational level.[657] This can reduce the effective use of skills and weaken the capacity of current systems to match qualifications with labour market needs. At the same time, representatives of professional organisations stressed that, in the absence of improved and more accessible information tools, the ability of both employers and authorities to accurately interpret competences and education systems remains limited, which may further constrain overall effectiveness of the system under the baseline scenario.[658] As a result, the baseline scenario is not expected to improve the consistency or predictability of procedures. TCNs would continue to face different routes depending on the Member State and purpose of recognition, while employers would continue to navigate fragmented systems when recruiting from outside the EU. CAs would also continue to operate largely within national or sector-specific frameworks, with limited scope for shared approaches or mutual learning. Evidence from the focus group with labour migration authorities and IOs[659] confirms that current rules and procedures vary considerably across Member States and, in some cases, within the same country, with migration authorities and professional recognition bodies often operating with limited coordination. During the focus group with representatives of professional organisations, it was also emphasised that practical barriers may arise where TCNs operating as drivers exchange their driving licences for EU licences. In some cases, the recognised date recorded is the date of exchange rather than the original date of issuance. As a result, drivers may be treated as having no prior experience and may be prevented from operating certain

[656] Focus Group with CAs of 09 March 2026 on access to regulated professions with CAs of crane operators and electricians.
[657] Focus Group of 19 March 2026 with TCNs.
[658] Focus Group of 17 March 2026 with representatives of professional organisations. Open discussion on Q: “To what extent do difficulties with recognition of qualifications affect recruitment of third-country nationals in your sector?”.
[659] Focus Group on labour migration with labour migration authorities and International Organisations of 02 March 2026.

Criteria	Rate	Summary of assessment
		vehicles or accessing specific roles[660]. This can create unnecessary obstacles to recruitment, reduce the effective use of available skills and constrain workforce availability in sectors facing shortages. Under the baseline scenario, such inconsistencies are likely to remain unresolved. Similarly, CAs[661] stressed that in some sectors national safety and licensing requirements remain highly specific, limiting the extent to which convergence can occur under the current framework. Overall, the baseline scenario is expected to have no significant impact (rate: 0) on this objective, as existing fragmentation is expected to persist and no structural improvement is introduced.
	0	*Specific Objective 2: Reduce legal and administrative complexity for recognition and validation of qualifications and skills of third-country nationals* Under the baseline scenario, no additional measures are introduced to simplify recognition and validation procedures or reduce their administrative burden. Existing procedures are expected to remain complex, often involving multiple authorities, extensive documentation requirements, translation and verification steps, and unclear or variable timelines. Evidence from the Public Consultation confirms this picture: TCNs respondents highlighted that fragmentation, combined with procedural complexity, contributes to lengthy and uncertain recognition and comparability processes, while also entailing burdensome and repetitive documentation requirements.[662] This means that TCNs would continue to face uncertainty when preparing applications, identifying the relevant pathway and understanding the documents required. Employers, particularly SMEs, would continue to face delays and uncertainty when recruiting internationally, as recognition or validation processes may not be aligned with recruitment and labour migration timelines. CAs would continue to rely on existing procedures, including case-by-case verification and documentation checks, without additional EU-level tools or common procedural guarantees. TCNs testimonies during the focus group also indicated that applicants face limited practical guidance, language barriers and the absence of direct support channels capable of helping them navigate procedures efficiently.[663] This is confirmed by representatives of professional organisations, whom when asked which obstacle creates the greatest difficulty for employers hiring third-country professionals or matching candidates in Talent Partnerships, they most frequently identified the length of procedures, followed by lack of clarity on the comparability of qualifications and difficulties in understanding skills where formal recognition is not required[664]. These findings suggest that, under the baseline scenario, prolonged procedures and insufficient transparency are likely to remain the most significant barriers to effective labour market matching and skills utilisation. Section 4 already identifies recognition processes as cumbersome and time-consuming, discouraging many potential applicants, and notes that complexity and cost can deter TCNs from seeking recognition and accessing professional practice matching their qualifications. This is confirmed by focus group evidence, where individual TCNs reported unclear procedures, lengthy recognition processes, financial barriers, translation requirements, lack of practical guidance and difficulties in using

[660] Focus Group of 17 March 2026 with representatives of professional organisations. Open discussion on Q: “To what extent do difficulties with recognition of qualifications affect recruitment of third-country nationals in your sector?”.
[661] Focus Group with CAs of 09 March 2026 on access to regulated professions with CAs of crane operators and electricians.
[662] PC Results. Q26: Have you had any personal experiences with any of these challenges, for example, when applying for jobs in a different country, recruiting people from another country or dealing with the recognition of qualifications or validation of skills? (n=98); in European Commission (2026). *Study Supporting an Impact Assessment of EU rules for the recognition of qualifications and validation of skills of third country nationals. Public Consultation Analysis*.
[663] Focus Group of 19 March 2026 with TCNs.
[664] Focus Group of 17 March 2026 with representatives of professional organisations. Poll Q: “Which obstacle creates the greatest difficulty for employers when hiring third-country professionals, or matching candidates in Talent Partnerships?”.

Criteria	Rate	Summary of assessment
		their skills at the appropriate level.[665] Employers also highlighted that the current system is highly complex and fragmented, and that companies may assess skills themselves because they cannot wait for lengthy procedures.[666] CAs further confirmed that, while some Member States unilaterally may continue streamlining procedures, under the current context the absence of coordinated EU action limits interoperability, scalability and overall simplification effects.[667] Overall, the baseline scenario is expected to have no significant impact (rate: 0) on this objective, as it does not introduce changes capable of making procedures faster, easier or less burdensome.
	0	*Specific Objective 3: Increase trust and understanding of qualifications and skills obtained in third countries* Under the baseline scenario, no additional EU-level measures are introduced to strengthen trust in third-country qualifications or improve the shared understanding of third-country education, training and quality assurance systems. Member States would continue to develop their own approaches to verification, assessment and cooperation with third countries, often independently and with limited shared infrastructure. As a result, concerns over authenticity of documents, limited knowledge of third-country education systems and doubts regarding quality assurance arrangements are expected to persist. TCNs may continue to face repeated verification requests and difficulties in proving the value of their qualifications. CAs may continue to duplicate efforts when assessing similar qualifications from the same countries of origin. Employers may continue to face uncertainty when interpreting foreign qualifications and skills. These challenges are confirmed by CAs and EU professional organisations, who highlighted during focus groups that differences in recognition practices across Member States create practical difficulties and inconsistencies.[668] In particular, for CAs, the absence of a commonly referenced level of qualifications across the EU currently contributes to divergent interpretations.[669] This may further undermine trust among institutions and towards qualifications. The focus group with labour migration authorities and IOs further highlighted difficulties linked to authenticity checks, fragmented contacts with third-country institutions and the need for more structured verification frameworks. Participants emphasised that verifying the authenticity of documents submitted by non-EU nationals remains a significant operational challenge, including in the context of labour migration procedures. The risk of issuing permits or recognition decisions on the basis of falsified or unreliable documentation was identified as a concrete concern, with potential implications for the credibility and integrity of current systems.[670] Stakeholders also noted that, while work is ongoing in some Member States to establish more reliable verification frameworks for diplomas and supporting documents, the development of such systems requires considerable time, coordination and technical integration with existing administrative back-end systems. Under the baseline scenario,

[665] Focus Group of 19 March 2026 with TCNs.
[666] Focus Group of 17 March 2026 with representatives of professional organisations
[667] Focus Group with CAs of 09 March 2026 on access to regulated professions with CAs of crane operators and electricians.
[668] Focus Group with CAs of 09 March 2026 on access to regulated professions with CAs of crane operators and electricians. Poll Q: "To what extent do differences across Member States in recognising TCN qualifications create difficulties for your authority?".
Focus Group of 13 March 2026 with CAs and EU professional organisations in the healthcare sector. Poll Q: "To what extent do differences across Member States in recognising TCN qualifications create difficulties for your authority?".
[669] Ibid.
[670] Focus Group of 02 March 2026 on labour migration with labour migration authorities and International Organisations. Open discussion on Q: "To what extent do the current rules on TCN recognition complicate migration governance in your country?".

Criteria	Rate	Summary of assessment
		where no additional EU-level support measures are introduced, progress is likely to remain uneven and dependent on national capacity.[671] In addition, contacts with institutions in third countries were described as frequently fragmented, with unclear referral pathways and limited responsiveness between relevant authorities[672]. This may continue to reduce confidence in assessment outcomes and constrain the ability of authorities to build consistent trust in third-country qualifications. The focus group with ENIC NARIC centres, PES and CSOs further underlined operational challenges in cases where third-country qualifications cannot be reliably assessed. ENIC NARIC centres stressed that a key difficulty is often the lack of reliable information from national sources including situations where government or institutional websites do not allow verification of the legal status of an educational institution or programme. In some cases, the authenticity of diplomas cannot be confirmed, which represents a key challenge for ENIC NARIC centres, particularly in relation to regulated health professions where accurate verification is essential for public safety and professional licensing. Old or outdated qualifications were also identified as particularly difficult to assess, due to limited availability of records and reduced accessibility of supporting information over time.[673] This is also confirmed by evidence from the Survey with ENIC NARIC, where 88.9% of respondents identified both the lack of reliable information on foreign institutions or programmes and concerns regarding document authenticity and fraud as the main challenges in recognising qualifications or validating skills of TCNs. These are followed by long verification times with third-country authorities (77.8%) and missing or incomplete documentation (66.7%).[674] Within this context, representatives of professional organisations also highlighted an important distinction between trust generated through private sector assessment and formal recognition granted by public authorities. While curriculum comparison and analysis of training quality may provide a certain level of assurance to private companies regarding the potential equivalence of foreign qualifications, this does not replace official recognition by competent public authorities. Formal recognition remains essential for full and legally secure access to regulated professions and for effective integration into national labour markets[675]. However, without the introduction of measures under this policy scenario, trust among institutions may continue to decrease due to current contextual bottlenecks. Overall, the baseline scenario is expected to have no significant impact (rate: 0) on this objective, as trust-building remains fragmented and dependent on national initiatives rather than a shared EU-level approach.
		Quantitative impact concerning number of recognition cases Under the baseline scenario, no additional measures are introduced to simplify procedures, improve information, strengthen trust in third-country qualifications or better connect recognition systems with labour migration instruments. As a result, the volume of recognition and validation cases concerning TCNs is not expected to increase significantly as a direct consequence of policy change. In the current framework, the number of applications and successful recognition outcomes is influenced primarily by external factors, including labour shortages in Member States, demographic change, migration flows,

[671] Ibid.
[672] Ibid.
[673] Focus Group of 04 March 2026 on information to TCNs with ENIC NARIC Centres, PES, and CSOs. Breakout room with ENIC NARIC centres, open discussion on Q: “How often do you encounter TCN qualifications that you cannot reliably assess with the information currently available to you?”.
[674] EU Survey to ENIC NARIC. Q26: What are the main challenges your NARIC centre faces in recognising qualifications or validating skills of TCNs? (n=18)
[675] Focus Group of 17 March 2026 with representatives of professional organisations. Open discussion on Q: “In your experience, which of the following challenges do third-country nationals face in the recognition of their qualifications and validation of skills?”.

Criteria	Rate	Summary of assessment
		geopolitical developments, employer demand, wage differentials, and the attractiveness of national admission channels. By contrast, the baseline scenario does not address the structural barriers identified in the report — namely fragmented systems, lengthy procedures, lack of transparency, duplicative checks and limited coordination between migration and recognition authorities. As a consequence, while recognition and validation volumes may fluctuate over time, such changes would mainly reflect labour market and migration dynamics rather than improvements in the functioning of the system itself. For TCNs, existing complexity and uncertainty are likely to continue discouraging a share of potential applicants from seeking recognition, particularly where procedures are costly, slow or difficult to understand. For employers, especially in shortage sectors, current bottlenecks may continue limiting the speed at which qualified candidates from third countries can be recruited and deployed. For CAs, existing administrative structures are expected to continue processing cases broadly at current capacity levels, subject to demand pressures rather than efficiency gains. Evidence from the focus group with employers and labour market stakeholders indicates that companies often face urgent recruitment needs and may bypass formal recognition routes where procedures are too slow or cumbersome.[676] The focus group with individual TCNs similarly highlighted that many qualified migrants face delays, uncertainty and difficulties in obtaining recognition, which may discourage engagement with the system.[677] In sectors with persistent shortages, such as healthcare, some growth in applications may still occur under the baseline scenario due to demand pressures. However, without procedural reform, these increases are likely to remain below potential and uneven across Member States. In quantitative terms, the annual volume of TCN recognition applications submitted in the EU is currently estimated at approximately 62,500 applications per year as a central empirical reference, with a convergence interval of 40,000 to 85,000 derived from the triangulation of five independent channels of evidence — the survey administered to CAs under the present study, the EMN Ad-Hoc Query 2024.16 administrative data on medical doctor recognition (which records 46,365 applications across 10 responding Member States in 2023), the BIBB official statistics on the recognition caseload of third-country nationals in Germany, the Eurostat channel based on first permits issued for remunerated activities (migr_resocc), and the focus group data forms returned by Member State authorities. Read against the structural deterrence effects identified during the analysis (regulatory asymmetry between the Professional Qualifications Directive 2005/36/EC and the absence of an equivalent framework for TCNs, self-declared deterrence acknowledged in Commission Recommendation (EU) 2023/2611 of 15 November 2023, over-qualification gap of 19 percentage points between non-EU citizens and EU nationals recorded by Eurostat lfsa_eoqgan), a deterrence-adjusted reading places the central estimate at approximately 35,000 applications per year. Both readings are reported in parallel and are not mutually substitutable. Under the baseline scenario, neither figure is expected to change as a direct consequence of policy action; the volume is expected to remain broadly stable in the medium term, with year-on-year fluctuations driven by labour market and migration dynamics rather than by improvements in the functioning of the recognition system. The dedicated TCN survey administered under the present study provides additional behavioural support for the deterrence dynamic: 10.5 per cent of respondents who reported an outcome on their recognition application indicated having withdrawn from the process due to its cost, length or complexity, a figure that anchors empirically the persistence of the deterrence effect under the unchanged baseline. The relationship between

[676] Focus Group of 17 March 2026 with representatives of professional organisations.
[677] Focus Group of 19 March 2026 with TCNs.

Criteria	Rate	Summary of assessment
		the empirical estimate and the long-term flow of approximately 52,929 establishment procedures per year recorded under the Professional Qualifications Directive (RegProf, mean 2020–2024), as well as the source-by-source detail of the methodology, is set out in Annex 4.6. Overall, the baseline scenario is therefore expected to have no significant quantitative impact (rate: 0) on the number of recognition and validation cases, with volumes evolving mainly in response to external market and migration drivers rather than policy-induced improvements.
	0	Overall assessment
Efficiency	0	*Specific Objective 1: Streamlining recognition and validation processes between and within Member States* Under the baseline scenario, no additional measures are introduced to improve coordination between the multiple authorities involved in the recognition of qualifications and validation of skills of TCNs. Existing fragmentation between migration authorities, CAs, professional bodies, education authorities and employment services is therefore expected to remain. From an efficiency perspective, this means that parallel procedures, duplicated administrative steps and repeated requests for information are likely to continue. In many cases, recognition and migration procedures remain governed by separate frameworks and timelines, creating avoidable transaction costs for applicants, employers and public administrations. For TCNs, fragmented systems may continue to generate additional time and cost burdens linked to navigating multiple institutions, resubmitting documents or repeating similar assessments. For employers, fragmentation may prolong recruitment processes and increase uncertainty when hiring from third countries. For CAs, the absence of stronger coordination mechanisms means that opportunities for economies of scale, shared expertise and streamlined case management remain limited. Evidence from the focus group on labour migration confirms that migration authorities and recognition bodies often operate with limited coordination, while rules and procedures vary significantly across Member States. The focus group on information provision also highlighted the multiplicity of actors involved and the lack of clear interfaces between systems. Representatives of professional organisations also stressed that recognition challenges are not limited to highly regulated professions but can also affect more technical occupations where qualifications are not standardised or mutually recognised across countries. An example raised concerned forklift drivers, where training obtained in one country may not be recognised in another, including within the EU. Cases were reported in which workers trained in one EU country were required to repeat the qualification process when returning to another EU country. This creates additional administrative burdens, delays, duplicated training requirements and avoidable costs for both workers and employers.[678] Under the baseline scenario, such inefficiencies linked to fragmented recognition systems are likely to persist. Overall, the baseline scenario is expected to have no significant impact (rate: 0) on the efficiency of addressing fragmentation, as existing inefficiencies are expected to persist.
	0	*Specific Objective 2: Reduce legal and administrative complexity for recognition and validation of qualifications and skills of third-country nationals* Under the baseline scenario, no additional measures are introduced to simplify procedures, reduce documentation requirements, clarify

[678] Focus Group of 17 March 2026 with representatives of professional organisations. Open discussion on Q: To what extent do difficulties with recognition of qualifications affect recruitment of third-country nationals in your sector?.

Criteria	Rate	Summary of assessment
		deadlines or improve user experience. Existing processes are therefore expected to continue relying on diverse national practices, often involving case-by-case assessments, document translations, authenticity checks and variable processing times. From an efficiency perspective, the baseline does not generate reductions in administrative costs or processing burdens. For TCNs, costs linked to translation, certification, document collection and repeated submissions are likely to remain significant. Focus group evidence with CAs highlights that applicants often struggle to understand procedural requirements, resulting in incomplete applications, delays and repeated submissions, all of which increase administrative inefficiencies.[679] Moreover, labour migration authorities and IOs noted that qualification assessments are frequently duplicated - once within migration procedures (e.g. visa or work permit processes) and again for access to regulated professions. In some cases, these are separate procedures assessing similar elements; in others, they are two entirely independent processes with little or no coordination.[680] This duplication creates avoidable costs and delays for both applicants and administrations, and, under the baseline scenario, this is likely to remain unchanged. Likewise, testimonies from TCNs during the focus group suggest that applicants may spend considerable time identifying the correct authority, understanding requirements and clarifying whether their institution is recognised.[681] Under the current baseline scenario, these search and compliance costs create avoidable inefficiencies for applicants and may also increase workloads for authorities dealing with incomplete or misdirected applications. For employers, delays in recognition may continue generating indirect costs linked to postponed recruitment, prolonged vacancies or the need to use temporary alternatives. For CAs, existing workloads associated with document verification and complex case handling are expected to remain broadly unchanged. CAs emphasised that documentation requirements slow down recognition procedures to a high extent. [682] More specifically, verifying, assessing, and investigating documents provided by applicants can take several times due to the multiplicity of documents and the fact that, in some specific cases, educational pathways can vary considerably. Moreover, CAs stressed that communication among relevant institutions within the recognition processes are not always immediate, delaying the whole evaluation procedure.[683] CAs and EU professional organisations further stressed that, in particular, the assessment of transcripts, syllabi and supporting records is often highly time-consuming, especially where documentation is incomplete, inconsistently presented or requires multiple resubmissions.[684] The focus group with labour migration authorities and IOs further highlighted that authorities currently receive a wide range of supporting documents, including fraudulent or unverifiable ones, without a consistent verification policy or reliable reference mechanism. In some cases, issuing institutions cannot be readily identified or confirmed, requiring additional manual checks and prolonging decision-making. The evidence from the ENIC NARIC survey further supports these considerations. Specifically, data from migration authorities indicates that the additional processing time required for skill and qualification checks most commonly ranges between 6 and 12 weeks (reported by 25% of respondents). In contrast, shorter timelines are less frequent, with only

[679] Focus Group with CAs of 09 March 2026 on access to regulated professions with CAs of crane operators and electricians. Open discussion on Q: “To what extent do documentation requirements slow down recognition procedures?”.
[680] Focus Group of 02 March 2026 on labour migration with labour migration authorities and International Organisations. Poll Q: “In your national context, to what extent do TCNs undergo duplicated qualification assessments – once as part of migration procedures (visa/work permit) and once for access to a regulated profession?”.
[681] Focus Group of 19 March 2026 with TCNs. Open discussion on Q: “To what extent have you experienced any difficulties to get your qualifications recognised in the EU?”.
[682] Ibid. Poll Q: “To what extent do documentation requirements slow down recognition procedures?”.
[683] Ibid. Open discussion on Q: “To what extent do documentation requirements slow down recognition procedures?”.
[684] Focus Group of 13 March 2026 with CAs and EU professional organisations in the healthcare sector. Open discussion on Q: “To what extent do documentation requirements slow down recognition procedures?”.

Criteria	Rate	Summary of assessment
		12.5% reporting a duration of less than two weeks and 8.3% citing 2–6 weeks. A small minority (4.2%) report that these procedures exceed 12 weeks.[685] Under the baseline scenario, these inefficiencies are expected to persist, limiting opportunities to reduce administrative burden, shorten processing times or improve procedural reliability.[686] In addition, during the focus group with ENIC-NARIC centres, PES and CSOs, ENIC NARIC centres underlined that a key structural constraint is the lack of sufficient staffing in CAs responsible for recognition procedures. This results in significant workload pressures, which further exacerbate processing delays and limit the capacity to absorb increasing application volumes.[687] This is also reflected in the Survey with CAs, which shows that the average timeline from complete application to decision for TCNs is often well above three months. In particular, 36% of respondents report processing times of 3–6 months, 11.2% report 6–12 months, 3.7% 1–2 years, and 1.9% 2–3 years. Only a small share of authorities reports shorter timelines, with 6.8% indicating less than one month and 40% reporting 1–3 months.[688] Under the baseline scenario, existing capacity limitations are likely to continue constraining efficiency gains. Section 4 already notes that procedures can be resource-intensive and burdensome and focus group participants repeatedly referred to lengthy and complex processes. Overall, the baseline scenario is expected to have no significant impact (rate: 0) on this objective from an efficiency perspective, as no cost-saving or burden-reduction measures are introduced.
	0	*Specific Objective 3: Increase trust and understanding of qualifications and skills obtained in third countries* Under the baseline scenario, no new shared EU mechanisms are introduced to support authenticity checks, comparability assessments or collective knowledge-building regarding third-country qualifications. Member States are therefore expected to continue relying largely on national tools, bilateral contacts and ad hoc assessments. From an efficiency perspective, this means that similar verification and assessment work may continue to be repeated across Member States, with limited pooling of expertise or shared evidence. Authorities may continue investing time and resources in assessing the same institutions, diplomas or education systems independently. Employers may also continue facing uncertainty when interpreting qualifications obtained outside the EU. In this regard, insights from the Public Consultation indicate that existing comparability tools do not adequately support real-world decision-making, particularly in recruitment and professional recognition contexts.[689] Focus group evidence from labour migration authorities and ENIC-NARIC actors underlined the potential value of common verification tools, shared databases and more structured exchanges of information, precisely because the current model can be duplicative and inefficient.[690]

[685] EU Survey to Migration Authorities. Q16: What is the typical additional processing time attributable to skills or qualification checks? (n=48).
[686] Focus Group of 02 March 2026 on labour migration with labour migration authorities and International Organisations. Open discussion on Q: "If common EU rules were introduced, by how much could the administrative burden on your migration system be reduced?".
[687] Focus Group of 04 March 2026 on information to TCNs with ENIC NARIC Centres, PES, and CSOs. Breakout room with ENIC NARIC centres, open discussion on Q: "What is the main risk if recognition procedures for TCNs are significantly simplified through automatic recognition/fast-track procedures?".
[688] EU Survey to CAs. Q16: In your experience, what is the average timeline from complete application to decision for third-country nationals? (n=190).
[689] PC Results. Q113: Would you suggest changes to any of the above tools to enhance the portability of skills and qualifications to the single market? If so, please elaborate (n=486), Contribution to the call for evidence – Confederation of Danish Employers; in European Commission (2026). *Study Supporting an Impact Assessment of EU rules for the recognition of qualifications and validation of skills of third country nationals. Public Consultation Analysis*.
[690] Focus Group of 04 March 2026 on information to TCNs with ENIC NARIC Centres, PES, and CSOs.

Criteria	Rate	Summary of assessment
		For TCNs, the absence of more trusted and comparable systems may continue generating repeated requests for evidence and longer decision-making processes. For CAs, the lack of shared infrastructure limits opportunities to reduce effort per case. As highlighted in the focus group with CAs, authorities frequently need to verify the authenticity of diplomas and professional qualifications of TCNs through embassy-issued documentation, such as the so-called "declaration of value". However, obtaining this document is often time-consuming, and the information provided tends to be incomplete or insufficiently detailed for assessment purposes.[691] In many cases, this necessitates additional verification steps with authorities in the country of origin. Yet, these follow-up requests also often result in partial or inconclusive information, further prolonging the assessment process.[692] In the absence of EU-level supporting mechanisms (baseline scenario), these cumulative verification layers risk reinforcing procedural inefficiencies and may also contribute to reduced institutional confidence in the robustness of available evidence. Public Consultation findings further indicate that, without robust competence-based reference points, recognition procedures tend to revert to curriculum-based comparisons, focusing on programme structure, duration and course content rather than on learning outcomes or demonstrated professional practice.[693] Moreover, most CAs participating in the focus group reported that they frequently or very frequently lack sufficient information to determine whether a third-country qualification includes the practical competences required for regulated professions.[694] Under the baseline scenario, where no additional tools or harmonised reference frameworks are introduced, these information gaps are likely to persist. This may further constrain assessment efficiency and continue to undermine both trust and comparability in relation to qualifications and skills obtained in third countries. For employers, uncertainty may continue delaying hiring decisions or leading to informal workarounds. Overall, the baseline scenario is expected to have no significant impact (rate: 0) on the efficiency of trust-building and comparability systems, as existing resource-intensive practices are expected to remain in place.
	0	*Quantitative impact concerning costs associated with baseline scenario* Under the baseline scenario, no additional measures are introduced to reduce the direct or indirect costs associated with the recognition of qualifications and validation of skills of TCNs. Existing administrative structures, procedural requirements and cost drivers are therefore expected to remain broadly unchanged. In the current system, costs arise for several stakeholder groups. For TCNs, these may include application fees, translation and certification costs, document retrieval, travel where required, and the opportunity cost of waiting periods or delayed labour market entry. For employers, costs may arise through prolonged recruitment processes, unfilled vacancies, repeated hiring attempts or the temporary underutilisation of available candidates. For CAs, costs are linked to staff time, case-by-case

[691] Focus Group with CAs of 09 March 2026 on access to regulated professions with CAs of crane operators and electricians. Open discussion on Q: "To what extent do documentation requirements slow down recognition procedures?".
[692] Ibid.
[693] PC Results. Q113: Would you suggest changes to any of the above tools to enhance the portability of skills and qualifications to the single market? If so, please elaborate (n=486), Contribution to the call for evidence – Confederation of Danish Employers; in European Commission (2026). *Study Supporting an Impact Assessment of EU rules for the recognition of qualifications and validation of skills of third country nationals. Public Consultation Analysis*.
[694] Focus Group with CAs of 09 March 2026 on access to regulated professions with CAs of crane operators and electricians. Poll Q: "How often do you lack sufficient information to determine whether a third-country qualification includes the practical competences required for regulated professions in your sector?".

Criteria	Rate	Summary of assessment
		assessment, authenticity checks, coordination between bodies and management of appeals or incomplete files. As no structural simplification or common EU support tools are introduced under the baseline scenario, these cost components are expected to persist. Any variation over time is likely to be driven primarily by fluctuations in the number of applications, labour shortages, migration inflows or national administrative reforms rather than by changes at EU level. For TCNs, existing burdens linked to documentation, translation and lengthy procedures are likely to remain significant in many cases. For employers, especially in sectors with urgent labour needs, delays in recognition may continue generating indirect recruitment and vacancy costs. For CAs, current workloads and administrative expenditures are expected to remain broadly stable, subject mainly to demand volumes rather than efficiency gains. Evidence from the focus group with individual TCNs highlighted financial barriers, translation costs and the burden of repeated administrative requests.[695] The focus group with employers noted that delays and uncertainty may impose significant business costs, particularly where vacancies need to be filled rapidly. Public authorities also pointed to the resource-intensive nature of verification and assessment tasks under the current model[696]. Overall, the baseline scenario is therefore expected to have no significant quantitative impact (rate: 0) on costs associated with recognition and validation procedures, reflecting the continuation of existing cost burdens without structural improvement or deterioration.
	0	Overall assessment
Coherence	0	*Specific Objective 1: Streamlining recognition and validation processes between and within Member States* Under the baseline scenario, no additional EU measures are introduced to address the fragmentation of recognition and validation systems for TCNs. Existing arrangements therefore remain based on diverse national, regional and sectoral approaches, with different institutional responsibilities, procedural models and levels of coordination. From an internal coherence perspective, the baseline scenario does not create inconsistencies beyond those already present in the current system, but neither does it resolve the misalignment identified in the report between labour migration systems, recognition procedures and validation pathways. Existing instruments continue to operate in parallel rather than as part of an integrated framework. Evidence from the focus group with CAs and EU professional organisations indicates that differences in recognition rules and practices across jurisdictions can incentivise applicants to submit applications in multiple Member States in order to identify where procedures are faster, less costly or less demanding. This may generate coherence challenges within the internal market. Where some Member States apply less stringent recognition criteria than others, qualifications may be recognised that would not necessarily be accepted elsewhere under stricter assessment approaches. This may create tensions for authorities applying more demanding standards, or for those whose procedures are perceived as disproportionately strict. Similar divergences were highlighted in relation to examination requirements, with some jurisdictions requiring no exams, while others require examinations for most or all applicants from outside the EU.[697] In addition, during the focus group with ENIC-NARIC centres, PES and CSOs, the ENIC NARIC centres highlighted that national legislation may

[695] Focus Group of 19 March 2026 with TCNs.
[696] Focus Group of 17 March 2026 with representatives of professional organisations.
[697] Focus Group of 13 March 2026 with CAs and EU professional organisations in the healthcare sector. Open discussion on Q: “To what extent do differences across Member States in recognising TCN qualifications create difficulties for your authority?”.

Criteria	Rate	Summary of assessment
		at times overlap or conflict with recognition procedures based on the Lisbon Recognition Convention. In practice, this can create situations where an applicant may comply with broader European recognition standards while encountering obstacles under domestic legal rules.[698] Under the baseline scenario, such parallel frameworks may generate legal uncertainty, inconsistent decision-making and additional complexity for authorities required to reconcile competing requirements on a case-by-case basis. Furthermore, during the focus group with representatives of professional organisations it was emphasised the lack of homogeneous standards across Member States, noting that qualifications are often regulated at regional level, resulting in a large number of systems that are broadly similar but not fully aligned. In practice, this leads to differences in the definition and interpretation of qualifications across regions, including within Member States with decentralised systems.[699] Under the baseline scenario, this may further undermine the coherence of the system. Overall, in the absence of further EU action, these differences are likely to persist. This may continue to undermine consistency in the treatment of comparable qualifications across Member States and weaken the coherence of professional regulation and recognition practices across the Union. Greater alignment in how standards are interpreted and applied could support a more consistent and predictable recognition framework, but such convergence is not expected under the baseline scenario. From an external coherence perspective, the baseline remains only partially aligned with broader EU objectives related to labour mobility, skills utilisation and talent attraction. While current initiatives such as the Skills and Talent Mobility Package, the future EU Talent Pool and broader legal migration instruments support entry pathways and recruitment, they do not systematically resolve fragmentation in recognition systems. For TCNs, this means continued exposure to different and sometimes overlapping systems. Individual testimonies during the focus group with TCNs stressed that this fragmentation also affect behavioural patterns of applicants, who tend to prioritise countries that are geographically closer or more familiar, rather than systematically comparing opportunities across the EU.[700] As a result, applicants may not fully benefit from the internal market logic of comparable treatment and mobility opportunities, since perceived administrative accessibility and information availability can influence destination choices. Under the baseline scenario, this may indirectly reduce system-wide coherence by reinforcing uneven use of recognition pathways across Member States. For employers, it means that talent attraction initiatives may continue to face bottlenecks at the recognition stage. For CAs, fragmented governance structures remain in place. Overall, the baseline scenario is expected to have no significant impact (rate: 0) on coherence regarding fragmentation, as the current degree of alignment remains broadly unchanged.
	0	*Specific Objective 2: Reduce legal and administrative complexity for recognition and validation of qualifications and skills of third-country nationals* Under the baseline scenario, no additional measures are introduced to simplify procedures, harmonise guarantees or reduce burdens. Existing national procedures therefore remain the main operational framework.

[698] Focus Group of 04 March 2026 on information to TCNs with ENIC NARIC Centres, PES, and CSOs. Breakout room with ENIC NARIC centres, open discussion on Q: “What impact would the introduction of common binding EU rules have for the reduction of heterogeneity and fragmentation of the procedures for the recognition of qualification obtained in third countries?”.
[699] Focus Group of 17 March 2026 with representatives of professional organisations. Open discussion on Q: “In your experience, which of the following challenges do third-country nationals face in the recognition of their qualifications and validation of skills?”.
[700] Focus Group of 19 March 2026 with TCNs. Open discussion on Q: To what extent would clearer EU-level information on recognition procedures available across Member States increase your understanding of recognition procedures?”.

Criteria	Rate	Summary of assessment
		From an internal coherence perspective, the baseline scenario does not worsen the consistency of current rules, but it also does not address the mismatch identified in the report between policy objectives — such as attracting talent or reducing shortages — and operational procedures that may remain lengthy, complex or unpredictable. From an external coherence perspective, the current framework remains only partially coherent with EU policies promoting competitiveness, labour market resilience and faster access to employment for needed skills. Admission channels may exist, but recognition and validation procedures may still delay effective labour market integration. For TCNs, the pathway from admission to employment may remain difficult to navigate. For employers, recruitment objectives may remain insufficiently aligned with recognition timelines. For CAs, separate procedures continue to operate without stronger integration. Evidence from stakeholder discussions with labour migration authorities, IOs and employers indicates that many current labour migration and recruitment initiatives are constrained by downstream recognition bottlenecks.[701] Overall, the baseline scenario is expected to have no significant impact (rate: 0) on coherence regarding procedural simplification and user experience.
	0	*Specific Objective 3: Increase trust and understanding of qualifications and skills obtained in third countries* Under the baseline scenario, no new shared EU tools or common frameworks are introduced to improve trust in third-country qualifications, support authenticity checks or enhance comparability across Member States. From an internal coherence perspective, the current system continues to rely on multiple national approaches, which may lead to differing assessments of similar qualifications and limited reuse of knowledge across jurisdictions. While not creating new inconsistencies, the baseline does not improve coherence in assessment practices. From an external coherence perspective, the baseline remains only partially aligned with wider EU transparency tools such as the European Qualifications Framework and with broader efforts to improve skills portability and evidence-based migration management. Existing EU tools support transparency, but do not fully resolve trust and comparability challenges for third-country qualifications. Indeed, focus group evidence from labour migration authorities and IOs further highlighted that fragmentation between institutions remains a key obstacle. While mobility agreements and cooperation arrangements with certain third countries are already in place, differences in how qualifications and skills are interpreted continue to create practical difficulties for migrants, employers and public authorities. Professional profiles may vary significantly across countries, even within the same occupation. For example, individuals trained as electricians in different third countries may possess substantially different technical competences, regulatory knowledge or practical experience despite holding similar titles.[702] For TCNs, this means continued uncertainty regarding how qualifications may be interpreted in different Member States. For employers, it may reduce confidence in foreign credentials. For CAs, duplicative assessments may continue.

[701] Focus Group of 02 March 2026 on labour migration with labour migration authorities and International Organisations; Focus Group of 17 March 2026 with representatives of professional organisations.
[702] Focus Group of 02 March 2026 on labour migration with labour migration authorities and International Organisations. Open discussion on Q: “If no new EU rules on the recognition of qualifications of TCN are introduced, how would the situation evolve over the next 5 years from a migration governance perspective?”.

Criteria	Rate	Summary of assessment
		Overall, the baseline scenario is expected to have no significant impact (rate: 0) on coherence regarding trust, comparability and shared understanding of third-country qualifications.
	0	Overall assessment
Proportionality	0	*Specific Objective 1: Streamlining recognition and validation processes between and within Member States* Under the baseline scenario, no new EU obligations, administrative requirements or compliance costs are introduced for Member States, CAs, employers or TCNs. Existing national systems for recognition and validation therefore continue to operate under the current legal and institutional framework. From a proportionality perspective, the baseline scenario fully preserves Member States' discretion in organising recognition procedures, labour migration systems and validation arrangements according to national needs and institutional structures. It does not impose additional regulatory burdens or require structural reforms. At the same time, because no action is taken, the baseline scenario does not address the fragmentation and coordination problems identified in the report, including duplication between recognition and migration pathways, multiple responsible authorities and uneven procedures across jurisdictions. For CAs, this means continued flexibility but no support in resolving structural inefficiencies. The focus group with labour migration authorities and IOs further highlighted that, at present, Member States largely carry out verification and assessment checks independently, without a common reference framework. This results in duplication of work across jurisdictions[703]. Under the baseline scenario, these parallel efforts are expected to continue, limiting opportunities for greater consistency and proportionality of documentation. For employers and TCNs, no new burdens are created, but no simplification benefits are generated either. Overall, the baseline scenario is expected to have no significant impact (rate: 0) on proportionality regarding fragmentation, as it neither introduces excessive intervention nor delivers corrective action.
	0	*Specific Objective 2: Reduce legal and administrative complexity for recognition and validation of qualifications and skills of third-country nationals* Under the baseline scenario, no new procedural rules, deadlines, documentation limits or fee constraints are introduced at EU level. Existing national systems therefore remain unchanged. From a proportionality perspective, this means the baseline scenario does not create new obligations or compliance costs for public authorities or private actors. Member States retain full discretion over how procedures are designed and managed, including timelines, documentation requirements and user support mechanisms. However, the absence of action also means that current burdens identified in the report — such as lengthy procedures, complex documentation requirements and variable user experience — remain unaddressed. While the baseline avoids regulatory intervention, it also forgoes opportunities to reduce burdens where these may already be disproportionate under current systems. For TCNs, no additional obligations are created, but existing burdens may remain. For employers, no new reporting or procedural requirements arise, but delays and uncertainty may continue. As highlighted in the focus group with CAs, certain sectors are characterised by particularly stringent requirements, which may contribute to labour shortages in specific

[703] Focus Group of 02 March 2026 on labour migration with labour migration authorities and International Organisations. Open discussion on Q: "Would the introduction of common EU rules on the recognition of professional qualifications of third-country nationals reduce administrative duplication between migration and recognition procedures?".

Criteria	Rate	Summary of assessment
		occupations. Some employers have therefore questioned whether such requirements are proportionate[704]. For CAs, current operational models remain intact without adjustment costs, but also without efficiency gains. Overall, the baseline scenario is expected to have no significant impact (rate: 0) on proportionality regarding procedural simplification and burden reduction.
	0	*Specific Objective 3: Increase trust and understanding of qualifications and skills obtained in third countries* Under the baseline scenario, no new EU systems, databases, authenticity mechanisms or common assessment frameworks are introduced. Member States continue to rely on their own tools, bilateral contacts and existing networks when assessing third-country qualifications. From a proportionality perspective, the baseline scenario avoids imposing new investment requirements, digital obligations or common methodologies on national administrations. It therefore fully respects national autonomy and minimises immediate compliance burdens. At the same time, because no shared framework is created, the baseline does not address the duplicative effort and uneven trust-building practices identified in the report. Authorities may continue to carry out similar assessments independently, and applicants may continue facing repeated requests for evidence across jurisdictions. For CAs, this means no new obligations but continued reliance on existing resource-intensive practices. For employers, uncertainty regarding foreign qualifications may persist. For TCNs, no additional procedural requirements are created, but no simplification benefits emerge. Overall, the baseline scenario is expected to have no significant impact (rate: 0) on proportionality regarding trust-building and comparability systems, reflecting the absence of both additional intervention and remedial action.
	0	Overall assessment

Annex 16.2 Assessment of PO 1: Soft coordination and digital support

Criteria	Rate	Summary of assessment
Effectiveness	1	*Specific Objective 1: Streamlining recognition and validation processes between and within Member States* Under Policy Option 1, a set of non-legislative measures is introduced to promote greater convergence, consistency and mutual learning across Member States. These include structured mutual-learning programmes and comparative studies on national practices (B1), guidelines on EU minimum training requirements for sectoral professions (B2), common templates and checklists for procedures (B3), benchmarking and capacity-building on validation of skills (B4), and dissemination of best practices on streamlined procedures (B5). There is also the improvement of EU-level information provision for individuals and employers, including in the EU Talent Pool (B7). These measures are expected to contribute positively to streamlining processes by supporting the exchange of experience, identifying more efficient national approaches and encouraging voluntary alignment of

[704] Focus Group with CAs of 09 March 2026 on access to regulated professions with CAs of crane operators and electricians. Open discussion on Q: “To what extent do documentation requirements slow down recognition procedures?”

Criteria	Rate	Summary of assessment
		administrative practices. Compared to the baseline scenario, where fragmentation and divergence persist, these actions introduce a first layer of structured coordination that can progressively reduce inconsistencies in recognition practices across Member States. They may be particularly useful in areas where Member States face similar operational challenges but currently act in isolation. For CAs, common templates, checklists and peer-learning activities may improve awareness of alternative models and support incremental reforms, facilitating gradual convergence of administrative practices without requiring immediate legislative harmonisation. For TCNs, clearer and more consistent approaches may gradually improve predictability in some Member States, particularly in terms of documentation requirements and procedural steps, although effects are expected to vary across Member States. For employers, especially those recruiting across borders, greater transparency and convergence may modestly reduce administrative complexity and interpretative uncertainty when assessing foreign qualifications. However, because the measures are non-binding and rely on voluntary uptake, their impact is likely to vary significantly across Member States. They do not establish enforceable common procedures, mandatory coordination mechanisms or legal obligations to reform fragmented systems. Evidence from stakeholder consultations indicates strong interest in exchange of practices and operational guidance but also confirms that fragmentation is structural and linked to national governance arrangements that may be difficult to change through soft measures alone. In particular, during the focus group with CAs it emerged that, from their perspective, EU-level standardised tools could play a supportive role in improving consistency. However, there is a clear expectation that responsibility for final assessment and certification should remain at national level, given existing institutional expertise and established administrative frameworks.[705] Standardised EU tools would therefore function as supporting instruments rather than substitutes for national decision-making, helping to improve comparability and reduce ambiguity in assessment processes while preserving domestic competence over final recognition outcomes. This is also confirmed by labour migration authorities and IOs, who strongly support coordination at EU level to address structural inefficiencies.[706] This is further supported by evidence from ENIC-NARIC centres, who during the focus group most of them indicated that common EU guidelines would be necessary to at least a moderate extent to ensure greater consistency of practices among Member States.[707] This suggests that non-binding EU guidance is widely perceived as capable of improving convergence while respecting national systems. Stakeholders also strongly favoured practical cooperation instruments beyond formal guidance. In particular, most ENIC NARIC centres considered exchanges of best practices the most effective soft measure for reducing heterogeneity and fragmentation.[708] This indicates that operational peer-learning and replication of proven national practices may generate more immediate effectiveness gains than purely analytical coordination tools.

[705] Focus Group with CAs of 09 March 2026 on access to regulated professions with CAs of crane operators and electricians. Open discussion on Q: “If the current system for recognition of qualifications of TCNs remains unchanged, with no EU action, how would the situation evolve over the next 5 years for regulated professions in your sector?”.

[706] Focus Group of 02 March 2026 on labour migration with labour migration authorities and International Organisations. Poll on Q: To what extent EU action is needed, compared to what can be achieved by Member States acting alone, to reduce heterogeneity and fragmentation in the recognition of professional qualifications of third-country nationals?

[707] Focus Group of 04 March 2026 on information to TCNs with ENIC NARIC Centres, PES, and CSOs. Breakout room with ENIC NARIC centres. Poll on Q: “To what extent do you think that common EU guidelines, would be necessary to ensure consistency of practices among Member States?”.

[708] Ibid. Poll on Q: “Beyond guidelines which of the following soft measures can be more effective in reducing heterogeneity and fragmentation of procedures among Member States?”.

Criteria	Rate	Summary of assessment
		Significantly, CAs and professional organisations considered Policy Option 1 the most proportionate approach compared to the other policy options, as it better balances labour market needs with public protection and quality assurance requirements. While expanding automatic recognition or pursuing more far-reaching harmonisation was seen as difficult, this policy option was viewed as allowing gradual improvement of existing mechanisms while maintaining high educational and safety standards.[709] Overall, Policy Option 1 is therefore expected to have a limited positive impact (rate: +1) on achieving this objective.
	1	*Specific Objective 2: Reduce legal and administrative complexity for recognition and validation of qualifications and skills of third-country nationals* Under Policy Option 1, several non-legislative actions aim to improve procedural clarity, reduce unnecessary administrative burdens, and enhance the overall user experience. These include EU-level guidance on procedural steps and indicative timelines (B8), recommendations on proportionate documentation and translation requirements (B9), guidance on reasonable fees (B10), and improved EU-level information for individuals and employers. These measures are expected to generate a modest, gradual improvement in accessibility and procedural efficiency. By increasing transparency on requirements, timelines and costs, they can help reduce information asymmetries that currently hinder applicants and employers and contribute to more efficient interaction with recognition systems across Member States. Better information may help applicants understand requirements earlier and prepare more complete files. Guidance on documentation and timelines may encourage some Member States to simplify processes or adopt more user-friendly practices. Employers may benefit from clearer information on recognition requirements when recruiting internationally. For TCNs, these measures may reduce uncertainty, lower administrative barriers at the application stage, and facilitate more complete and timely submissions, thereby improving the overall navigation of procedures. Focus group evidence with TCNs further underlined that standardised online information alone may not be sufficient, as many applicants face highly individual circumstances requiring personalised guidance. Stakeholders therefore highlighted the added value of combining digital platforms with human support channels such as helplines, direct contacts or peer-support mechanisms involving applicants whose qualifications have already been recognised.[710] Where such complementary support exists, the practical effectiveness of information measures could increase significantly. Participants also stressed that faster and simpler recognition procedures would make a substantial difference to labour market integration outcomes. Delays in recognition were described as a key factor pushing qualified individuals into lower-skilled or unrelated employment, sometimes permanently redirecting professional careers.[711] More accessible and timely procedures could therefore materially improve skills matching and help applicants pursue employment pathways aligned with their qualifications. For employers, they may facilitate planning and recruitment decisions. For CAs, shared guidance and best practices may contribute to more standardised workflows and a reduction in avoidable administrative requests related to incomplete or incorrectly submitted documentation.

[709] Focus Group of 13 March 2026 with CAs and EU professional organisations in the healthcare sector.
[710] Focus Group of 19 March 2026 with TCNs. Open discussion on Q: "Would digital verification of qualifications (i.e. supporting use of digital or AI-powered solutions for verification of documents; requiring issuance of qualifications as verifiable digital credentials) have simplified your recognition process?".
[711] Ibid.

Criteria	Rate	Summary of assessment
		However, the impact is likely to remain limited because the measures do not impose binding deadlines, common documentation caps or enforceable procedural guarantees. Member States may choose different levels of implementation, and burdensome practices may remain in place where no national follow-up occurs. While guidance may help simplify administrative steps, the absence of binding common rules means that divergent legal requirements across Member States are likely to remain. Evidence from focus groups with employers and individual TCNs highlighted that lengthy procedures, high documentation burdens and unclear costs are among the main practical obstacles currently faced by applicants and employers. These barriers may be only partially addressed through recommendations alone.[712] In particular, during the focus group with CAs, stakeholders highlighted that access to structured and comparable information on education and training systems in third countries would significantly improve assessment processes. As noted, the availability of standardised information on curricula and training requirements - comparable to national occupational standards - would facilitate the identification of gaps in qualifications, support more accurate comparisons, and help guide candidates towards additional training where necessary.[713] Such improvements would strengthen the transparency and interpretability of foreign qualifications, thereby indirectly supporting more efficient recognition processes. Overall, Policy Option 1 is therefore expected to have a limited positive impact (rate: +1) on reducing legal and administrative complexity, primarily through improved transparency, better information provision and incremental simplification of procedural practices, rather than through structural legal harmonisation.
	1	*Specific Objective 3: Increase trust and understanding of qualifications and skills obtained in third countries* Under Policy Option 1, non-legislative measures are introduced to strengthen trust in third-country qualifications and improve shared understanding across Member States. These include support for fraud and authenticity checklists and digital tools (B11), pre-departure support under Talent Partnerships (B12), additional comparisons of third-country qualifications frameworks with the European Qualifications Framework (B13), information exchange in relevant EU groups (B14), and support for ETF work on quality assurance transparency (B15). These measures are expected to generate useful improvements by expanding the evidence base and interpretative capacity available to authorities. By improving access to reliable information, enhancing transparency of education systems, promoting common reference points, strengthening trust in certain qualifications and education systems, and supporting early-stage validation of skills, this policy option may contribute to more informed and consistent assessment practices across Member States. They may also support better-prepared applicants through pre-departure actions and documentation preparation. For CAs, access to shared information and authenticity tools may reduce uncertainty in the assessment of foreign qualifications in certain cases and increase confidence in decision-making processes. For TCNs, strengthened pre-departure preparation and clearer documentation standards may increase the likelihood of successful recognition and reduce the risk of incomplete or non-verifiable applications. For employers, clearer signals on qualification comparability may support hiring decisions.

[712] Focus Group of 17 March 2026 with representatives of professional organisations; Focus Group of 19 March 2026 with TCNs.
[713] Ibid. Open discussion on Q: “Would structured EU-level information on third-country education and training systems materially improve your assessment capacity? (examples: comparative studies, quality assurance mapping, cooperation agreements)”.

Criteria	Rate	Summary of assessment
		Moreover, evidence from the focus group with CAs highlighted interest in digital credential verification systems linked to third country issuing institutions, particularly as a means of improving trust and traceability of qualifications. Such systems could, in principle, enable real-time verification of certificates issued abroad and strengthen confidence in authenticity. However, stakeholders also emphasised that implementation would require significant technical and institutional prerequisites, including access to comprehensive and reliable databases of issuing institutions and qualifications in third countries, which are not currently available at global scale.[714] As a result, while digital verification tools may offer potential, their operationalisation is likely to be complex and gradual. Labour migration authorities and IOs further confirmed during the focus group strong perceived benefits of structured cooperation with third countries, with the majority expecting moderate and significant improvements in recognition outcomes.[715] During the open discussion, they highlighted how Talent Partnerships and similar frameworks already demonstrate how integrated approaches combining migration, skills development and recognition can improve effectiveness outcomes in recognition.[716] However, because these actions remain voluntary and do not create common binding assessment rules or EU-level recognition effects, their impact is likely to be uneven and gradual. Structural differences in national recognition standards and risk tolerance may continue to produce divergent outcomes. In this regard, during the focus group, ENIC NARIC centres highlighted the potential value of a more centralised EU verification mechanism capable of confirming authenticity, preventing fraud and providing access to information on quality assurance systems, accreditation status and learning outcomes. Such a mechanism could significantly strengthen trust in third-country qualifications by reducing current reliance on fragmented and repetitive national verification efforts.[717] Overall, evidence from consultations showed strong interest in shared databases, comparability tools and better understanding of third country systems, but also indicated that trust deficits are significant and may require stronger common frameworks to be fully addressed. Overall, Policy Option 1 is therefore expected to have a limited but positive impact (rate: +1) on achieving this objective.
	-	*Quantitative impact concerning number of recognition cases* Under Policy Option 1, a set of non-legislative measures is introduced to improve information provision, promote mutual learning, support greater consistency of procedures and strengthen trust in third-country qualifications. These include improved EU-level information for individuals and employers (B7), guidance on procedural steps and indicative timelines (B8), recommendations on proportionate documentation requirements (B9), support for authenticity checks and digital verification tools (B11), pre-departure support under Talent Partnerships (B12), and comparative and benchmarking actions across Member States (B1–B5).

[714] Ibid. Open discussion on Q: Would common EU-level tools reduce the time and effort needed for your qualification assessments? (examples: shared databases of third-country training programmes, standardised assessment templates, pooled recognition precedents, digital credential verification systems linked to third-country authorities)".
[715] Focus Group of 02 March 2026 on labour migration with labour migration authorities and International Organisations. Poll on Q: "Would structured cooperation agreements with third countries (e.g. Talent Partnerships or bilateral frameworks) materially improve recognition outcomes?".
[716] Ibid.
[717] Focus Group of 04 March 2026 on information to TCNs with ENIC NARIC Centres, PES, and CSOs. Breakout room with ENIC NARIC centres. Open discussion on Q: "To what extent do you think that common EU guidelines, would be necessary to ensure consistency of practices among Member States?".

Criteria	Rate	Summary of assessment
		By addressing some of the informational and procedural barriers identified in the baseline scenario, these measures are expected to generate a limited increase in the number of recognition and validation cases compared with Policy Option 0. Their main effect would be to make existing systems easier to navigate, encourage more potential applicants to engage with recognition pathways, and improve preparedness of candidates before arrival. For TCNs, better information on applicable procedures, required documentation, fees and indicative timelines may reduce uncertainty and increase the likelihood that qualified individuals submit applications. Pre-departure support measures may further facilitate earlier preparation of documentation and skills evidence, particularly in the context of Talent Partnerships. For employers, especially in shortage sectors, clearer information and modest procedural improvements may support recruitment planning and encourage greater use of formal recognition channels when hiring from third countries. This may be particularly relevant for employers unfamiliar with national recognition systems. For CAs, common templates, guidance and mutual learning may improve case handling practices in some Member States and modestly increase processing capacity or consistency over time. Evidence from the focus group with individual TCNs indicates that lack of information, unclear procedures and administrative complexity are important factors discouraging applicants from pursuing recognition. The focus group with employers also highlighted that more transparent and understandable systems could help firms make greater use of international recruitment channels. However, the quantitative impact is likely to remain limited because Policy Option 1 does not introduce binding procedural simplification, common deadlines or automatic effects across Member States. Uptake of the measures would depend on voluntary implementation, and structural barriers linked to fragmented governance and legal diversity would remain. As a result, recognition and validation volumes are expected to increase only moderately above the baseline trajectory, with effects likely concentrated in Member States that actively implement the guidance and support measures. In quantitative terms, the limited positive effect of Policy Option 1 on the volume of recognition applications is expected to translate into an additional flow in the order of one to three thousand applications per year above the baseline of around 62,500. The figure reflects three considerations. First, the non-legislative nature of the measures, which do not modify legal deadlines, fee structures or documentation rules and therefore operate primarily through information availability and procedural transparency. Second, the empirical evidence on the latent demand pool of TCNs declaring an intention to apply for recognition without having yet done so: in the dedicated TCN survey administered under the present study (n=154), 29.9 per cent of respondents express such an intention, a figure that rises to 55.8 per cent in the corresponding sub-sample of the Public Consultation (n=95) and stands at 39.8 per cent in the pooled dataset (n=249); voluntary information-only measures are expected to activate only a small fraction of this pool, in the order of 5 to 10 per cent. Third, the implementation discount typical of voluntary frameworks, where uptake is conditional on active national engagement, further moderates the effect. The figures should be read as orders of magnitude given the absence of a directly observable elasticity of TCN application behaviour to information-only measures. The wider methodology is documented in Annex 4.6. Overall, Policy Option 1 is therefore expected to have a limited positive quantitative impact (rate: +1) on the number of recognition and validation cases.

Criteria	Rate	Summary of assessment
	1	Overall assessment
Efficiency	1	*Specific Objective 1: Streamlining recognition and validation processes between and within Member States* Under Policy Option 1, a set of non-legislative measures is introduced to promote more coordinated and streamlined practices across Member States. These include structured mutual-learning programmes and comparative studies (B1), common templates and checklists for procedures (B3), benchmarking and capacity-building activities (B4), dissemination of best practices on streamlined national systems (B5), and improved EU-level information provision for individuals and employers, including through the EU Talent Pool (B7). From an efficiency perspective, these measures are expected to generate limited but positive improvements by helping authorities identify more efficient organisational models, reduce avoidable duplication and learn from administrative practices already tested elsewhere. In some Member States, this may support better coordination between recognition, migration and employment bodies. Evidence from CAs and EU professional organisations during the focus group further suggests that efficiency gains could be strengthened through the use of more operational tools supporting assessment processes. In particular, verified digital credentials are perceived as the most effective measure to reduce assessment time, followed by improved information on education and training systems, while standardised assessment templates and shared recognition precedents were each selected by a small minority.[718] Moreover, most stakeholders participating in the focus group considered that common EU-level tools would lead to at least a moderate reduction in assessment time.[719] Open discussions reinforce these findings. CAs and EU professional organisations highlighted that shared and consistent recognition processes could improve both efficiency and public safety. In addition, stakeholders noted that the introduction of digital verification systems - particularly for education credentials - could significantly speed up administrative workflows by reducing reliance on paper-based procedures and enabling faster validation of qualifications through secure digital records.[720] For CAs, thus, shared templates, benchmarking tools, and peer learning may modestly reduce administrative effort linked to unclear responsibilities or inconsistent internal practices. This is confirmed by CAs, who during the focus group highlighted their preference for standardised assessment templates, considering them as a practical instrument that could support a first stage of common assessment.[721] At the same time, enhanced exchange of practices may contribute to better case management and reduce duplication in the handling of similar applications. In addition, CAs and EU professional organisations indicated during the focus group that where comprehensive and structured information on third-country education and training systems is available, assessment

[718] Focus Group of 13 March 2026 with CAs and EU professional organisations in the healthcare sector. Poll on Q: “Which measures would most reduce the time needed to assess applications?”.
[719] Ibid. Poll on Q: “Would common EU-level tools reduce the time and effort needed for your qualification assessments? (examples: shared databases of third-country training programmes, standardised assessment templates, pooled recognition precedents, digital credential verification systems linked to third-country authorities)”.
[720] Ibid. Open discussion on Q: “Would common EU-level tools reduce the time and effort needed for your qualification assessments? (examples: shared databases of third-country training programmes, standardised assessment templates, pooled recognition precedents, digital credential verification systems linked to third-country authorities)”.
[721] Focus Group with CAs of 09 March 2026 on access to regulated professions with CAs of crane operators and electricians. Open discussion on Q: “Which measures would reduce the time needed to assess applications?”.

Criteria	Rate	Summary of assessment
		times for complex cases could be significantly reduced.[722] Stakeholders also emphasised that pre-verified, EU-level consolidated information would reduce the need for repeated analysis of curricula and institutional backgrounds, particularly in resource-intensive cases.[723] At the same time, it was noted that the feasibility of large-scale shared databases remains challenging due to issues of maintenance, data reliability and uneven participation across Member States,[724] which may limit the extent of achievable efficiency gains in practice. For TCNs, improved information provision and more streamlined procedures may reduce time spent navigating multiple institutions and administrative effort. For employers, better coordination may marginally improve predictability when recruiting internationally. However, because the measures are voluntary and do not require structural reform, their efficiency effects are likely to vary considerably across Member States. They do not create binding obligations to reorganise fragmented systems or remove duplicative national processes. Focus group evidence coming from CAs and EU professional organisations also shows that EU-level coordination is seen by them as more important for enabling convergence than bilateral cooperation alone, with a majority of stakeholders indicating that EU action is needed to at least a moderate extent to address fragmentation.[725] However, views also highlighted the importance of preserving national competence, particularly regarding final recognition decisions and professional standards,[726] which may limit the depth of possible harmonisation and associated efficiency gains. Evidence from stakeholder consultations with labour migration authorities and IOs, but also with ENIC NARIC, PES and CSOs, indicates interest in mutual learning and better coordination, but also confirms that fragmentation often reflects entrenched governance arrangements that soft measures alone may only partially influence.[727] Overall, Policy Option 1 is therefore expected to have a limited positive impact (rate: +1) on efficiency regarding this objective.
	1	*Specific Objective 2: Reduce legal and administrative complexity for recognition and validation of qualifications and skills of third-country nationals* Under Policy Option 1, non-legislative actions aim to simplify administrative processes and reduce unnecessary burdens. These include guidance on procedural steps and indicative timelines (B8), recommendations on proportionate documentation and translation requirements (B9), guidance on reasonable fees (B10), and improved EU-level information for users and employers (B7). From an efficiency perspective, these measures are expected to deliver limited cost and time savings by helping applicants submit more complete files, reducing avoidable requests for missing information and encouraging some authorities to adopt more proportionate practices. In addition, clearer procedural frameworks may help reduce duplication of administrative effort across recognition and migration pathways, where

[722] Focus Group of 13 March 2026 with CAs and EU professional organisations in the healthcare sector. Poll on Q: "If comprehensive information on key-third country education and training systems were available, by how much could your assessment time for complex cases be reduced?".
[723] Ibid. Open discussion on Q: "If comprehensive information on key-third country education and training systems were available, by how much could your assessment time for complex cases be reduced?".
[724] Ibid.
[725] Ibid. Poll on Q: "To what extent is EU-level action needed to reduce fragmentation in TCN qualification recognition in your professional sector, compared to what Member States could achieve through bilateral cooperation alone?".
[726] Ibid. Open discussion.
[727] Focus Group of 02 March 2026 on labour migration with labour migration authorities and International Organisations; Focus Group of 04 March 2026 on information to TCNs with ENIC NARIC Centres, PES, and CSOs.

Criteria	Rate	Summary of assessment
		similar documentation is currently assessed multiple times by different authorities, as it emerged during the analysis of the baseline scenario. For TCNs, clearer information and better guidance may reduce compliance costs linked to repeated submissions, unnecessary translations or procedural misunderstandings. Improved transparency on steps, timelines and fees may also reduce the time spent identifying CAs and clarifying requirements, thereby lowering search and information costs. For employers, more transparent processes may modestly reduce recruitment delays and associated vacancy costs. For CAs, better-prepared applications may lower time spent on incomplete cases and repetitive exchanges with applicants. However, because Policy Option 1 does not impose binding deadlines, common document caps or enforceable simplification rules, many existing burdens may remain. Efficiency gains therefore depend on voluntary implementation and administrative follow-up at national level. In particular, the absence of enforceable procedural standards means that administrative simplification is likely to be uneven across Member States, with efficiency gains concentrated in those jurisdictions that actively adopt and implement the guidance. Evidence from focus groups with employers and individual TCNs highlighted that lengthy procedures, complex documentation and unclear costs are among the main practical burdens currently faced by applicants and employers. These issues may be only partially alleviated through guidance alone.[728] Overall, Policy Option 1 is therefore expected to have a limited positive impact (rate: +1) on efficiency regarding this objective.
	1	*Specific Objective 3: Increase trust and understanding of qualifications and skills obtained in third countries* Under Policy Option 1, measures are introduced to improve access to information and support more efficient assessment of third-country qualifications. These include fraud and authenticity checklists and digital verification tools (B11), pre-departure support under Talent Partnerships (B12), additional qualifications framework comparisons (B13), information exchange in EU fora (B14), and ETF support on quality assurance transparency (B15). From an efficiency perspective, these measures are expected to create limited improvements by reducing uncertainty in some assessments, avoiding repeated requests for evidence and increasing the availability of shared reference information. In addition, they may gradually reduce the need for repeated independent verification of the same institutions or qualifications across Member States by strengthening common reference points and improving upstream validation of documentation. For CAs, common sources of information may reduce time spent researching unfamiliar education systems or institutions. The use of shared verification tools and reference materials may also streamline authenticity checks, particularly in cases where current procedures rely on fragmented or bilateral confirmation channels. For TCNs, better-prepared documentation and stronger transparency may shorten some assessment stages. For employers, clearer understanding of foreign qualifications may support quicker recruitment decisions. These improvements may also help address broader issues identified in the Public Consultation, particularly gaps in understanding and a widespread lack of trust in third-country qualification systems: a significant number of stakeholders reported mistrust as a key barrier in recognition processes. This perception appears especially pronounced among TCNs themselves, who often describe a systemic scepticism towards non-EU education systems, largely independent of individual experience or skill level. Civil society organisations and trade unions similarly point to

[728] Focus Group of 17 March 2026 with representatives of professional organisations; Focus Group of 19 March 2026 with TCNs.

Criteria	Rate	Summary of assessment
		mistrust as a driver of underemployment and occupational downgrading[729]. However, because these tools remain supportive rather than binding, authorities may continue using different methodologies and standards. Similar assessments may still be repeated across Member States, limiting potential economies of scale. Moreover, the absence of mandatory interoperability of verification systems or harmonised assessment protocols means that efficiency gains will likely depend on voluntary uptake and the existing administrative capacity of national authorities. Evidence from consultations with CAs and healthcare sector, but also with labour migration authorities and IOs, highlighted interest in shared databases, authenticity tools and common reference sources, precisely because the current model can be resource-intensive and duplicative[730]. In particular, as seen in the baseline scenario, stakeholders emphasised that duplication of verification efforts across Member States is a key driver of inefficiency, reinforcing the potential value of more coordinated EU-level tools. Focus group evidence coming from CAs and EU professional organisations also indicates strong perceived efficiency gains from improved EU-level cooperation, with a majority of stakeholders supporting the need for EU action to at least a moderate extent in order to reduce fragmentation and strengthen trust-building systems.[731] At the same time, stakeholders stressed that formal cooperation with third countries remains important for improving verification reliability, as illustrated by calls for IMI-like systems for third-country qualification verification.[732] Overall, Policy Option 1 is therefore expected to have a limited positive impact (rate: +1) on efficiency regarding this objective.
	1	*Quantitative impact concerning costs associated with baseline scenario* Under Policy Option 1, a set of non-legislative measures is introduced to improve information provision, promote mutual learning, encourage more proportionate administrative practices and strengthen trust in third-country qualifications. These include guidance on procedural steps and indicative timelines (B8), recommendations on documentation and translation requirements (B9), guidance on reasonable fees (B10), improved EU-level information for users and employers (B7), and tools supporting authenticity checks and comparability (B11–B15). As highlighted in Section 4, the current system can generate significant direct and indirect costs for TCNs, employers and CAs. These include application fees, translation and certification expenses, repeated administrative steps, delays in labour market entry, recruitment bottlenecks and resource-intensive case-by-case assessments. Evidence from the survey with CAs supports in specifying the types of costs typically incurred by TCNs in the recognition of qualifications. Respondents identified, in particular, translation of documents (65.4%), application fees (56.5%), authentication/legalisation of documents (40.8%) and additional training, examinations or tests (39.3%).[733] Policy Option 1 is expected to reduce some of these costs, but only to a limited extent.

[729] PC results. Q25: Do you think there are other issues that make it harder for people to have their skills and qualifications understood, recognized and valued in another country? (n=486); in European Commission (2026). *Study Supporting an Impact Assessment of EU rules for the recognition of qualifications and validation of skills of third country nationals. Public Consultation Analysis*.
[730] Focus Group of 13 March 2026 with CAs and EU professional organisations in the healthcare sector; Focus Group of 02 March 2026 on labour migration with labour migration authorities and International Organisations.
[731] Ibid. Poll on Q: "To what extent is formal cooperation with third countries needed to strengthen understanding and trust on third-country qualifications?".
[732] Ibid. Open discussion on Q: "To what extent is formal cooperation with third countries needed to strengthen understanding and trust on third-country qualifications?".
[733] EU Survey to CAs. Q17: What type of costs are typically incurred by third country nationals for recognition of qualifications? (n=190).

Criteria	Rate	Summary of assessment
		For TCNs, clearer information and better guidance may help reduce avoidable expenditure linked to incomplete applications, unnecessary translations or repeated submissions. Recommendations on proportionate documentation requirements may encourage some Member States to lower compliance burdens, while greater transparency on fees may improve predictability. For employers, especially those recruiting internationally, more accessible information and modest procedural improvements may reduce some indirect costs linked to uncertainty, repeated recruitment efforts or delayed onboarding of candidates. For CAs, common templates, checklists, mutual learning and better access to shared information may modestly reduce administrative effort per case, particularly where authorities choose to adopt improved internal practices. Evidence from the focus group with individual TCNs highlighted costs linked to translations, document gathering, repeated procedures and lengthy waiting periods[734]. Employers similarly noted that procedural delays can create significant business costs, especially in shortage sectors.[735] Public authorities also identified verification and assessment work as resource-intensive under the current model.[736] However, the overall quantitative impact on costs is expected to remain limited. Policy Option 1 does not introduce binding simplification rules, common fee caps, mandatory deadlines or shared EU operational systems. As a result, many structural cost drivers identified in Section 4 are likely to remain, and savings would depend on voluntary implementation by Member States. Any reductions in costs are therefore expected to be modest and uneven across the EU, with stronger effects in Member States that actively implement the recommended practices. Overall, Policy Option 1 is therefore expected to have a limited positive quantitative impact (rate: +1) on costs associated with recognition and validation procedures.
	+1	Overall assessment
Coherence	1	*Specific Objective 1: Streamlining recognition and validation processes between and within Member States* Under Policy Option 1, non-legislative measures are introduced to promote greater convergence and coordination across Member States. These include mutual-learning programmes, comparative studies, common templates and checklists, benchmarking exercises and dissemination of best practices (B1–B7). From an internal coherence perspective, these measures are broadly aligned with the objective of streamlining processes, as they seek to address fragmentation and duplication identified in Section 4 through softer coordination tools rather than regulatory intervention. They support a more structured exchange between national systems and may help identify approaches that can be replicated elsewhere. From an external coherence perspective, Policy Option 1 is broadly consistent with wider EU objectives on skills portability, labour market integration and talent attraction. It complements existing initiatives such as the European Commission, Talent Partnerships and broader legal migration policies by improving the functioning of existing recognition systems without altering national competences. For TCNs, these measures may gradually improve the consistency of user experience across Member States. For employers, greater convergence may modestly reduce uncertainty when recruiting across

[734] Focus Group of 19 March 2026 with TCNs.
[735] Focus Group of 17 March 2026 with representatives of professional organisations.
[736] Focus Group of 02 March 2026 on labour migration with labour migration authorities and International Organisations.

Criteria	Rate	Summary of assessment
		borders. For CAs, stronger peer exchange may improve alignment of administrative practices. However, because the measures are voluntary and non-binding, their impact on coherence is likely to remain limited. Structural divergences in governance models, legal frameworks and institutional responsibilities may continue. Overall, Policy Option 1 is therefore expected to have a limited positive impact (rate: +1) on coherence regarding this objective.
	1	*Specific Objective 2: Reduce legal and administrative complexity for recognition and validation of qualifications and skills of third-country nationals* Under Policy Option 1, measures are introduced to improve transparency and encourage simplification, including guidance on procedural steps and indicative timelines (B8), recommendations on documentation and translation requirements (B9), guidance on fees (B10), and improved information provision for applicants and employers (B7). From an internal coherence perspective, these actions are aligned with the objective of reducing complexity, as they directly target several barriers identified in Section 4, including unclear requirements, variable practices and burdensome procedures. From an external coherence perspective, Policy Option 1 supports wider EU priorities related to competitiveness, labour shortages and better use of migrant skills by making existing pathways easier to navigate. It is also coherent with the Skills and Talent Mobility Package and initiatives aimed at facilitating access to employment for TCNs. Moreover, during the focus group, ENIC NARIC centres further stressed that recognition policy should not be treated as a standalone process, as recognition outcomes are closely linked to labour market access, validation of prior learning, mobility pathways and integration policies.[737] This reinforces the need for coherence between qualification recognition measures and wider EU employment, skills and migration initiatives. For TCNs, the option may modestly improve clarity and predictability of procedures. For employers, it may help align recruitment planning with recognition processes. For CAs, it may encourage more proportionate and user-friendly practices. However, coherence gains are likely to remain partial because the option does not create binding common standards, common deadlines or enforceable procedural guarantees. Legal and administrative diversity across Member States would therefore remain substantial. Overall, Policy Option 1 is therefore expected to have a limited positive impact (rate: +1) on coherence regarding this objective.
	1	*Specific Objective 3: Increase trust and understanding of qualifications and skills obtained in third countries* Under Policy Option 1, several non-legislative measures are introduced to strengthen trust and shared understanding. These include authenticity tools and checklists (B11), pre-departure support (B12), comparisons of third-country qualifications frameworks with the European Qualifications Framework (B13), exchanges of information in EU fora (B14), and ETF work on quality assurance transparency (B15). From an internal coherence perspective, these actions are well aligned with the objective of increasing trust and understanding, as they directly address challenges identified in Section 4 concerning limited knowledge of third-country systems, authenticity concerns and inconsistent assessment practices. This also aligns with results from the Survey with CAs, where respondents identified key challenges when assessing third-country qualifications, including incomplete or non-transparent

[737] Focus Group of 04 March 2026 on information to TCNs with ENIC NARIC Centres, PES, and CSOs. Breakout room with ENIC NARIC centres, open discussion.

Criteria	Rate	Summary of assessment
		documentation (63.7%), difficulty verifying authenticity (60%), lack of information about awarding bodies or institutions in third countries (60.5%), language barriers (53%), and difficulties in identifying counterparts or contacts abroad (37.4%).[738] From an external coherence perspective, the option is coherent with broader EU transparency and skills portability tools, including the European Qualifications Framework and existing cooperation networks. It also complements the EU's external talent partnerships by supporting better upstream preparation and information flows. During the focus group, ENIC NARIC centres made also reference to Commission-supported projects for displaced persons from Ukraine, implemented with strong cross-border institutional cooperation. These initiatives were considered highly effective in connecting recognition, labour market integration and emergency mobility responses,[739] illustrating how targeted EU-supported actions can strengthen coherence across policy domains. Stakeholders further noted that similar sector-specific projects could generate substantial added value in areas facing labour shortages, particularly where the Commission provides coordination, funding and institutional networking capacity.[740] For CAs, greater access to shared information may improve confidence in some assessments. For employers, clearer comparability signals may support recruitment decisions. For TCNs, stronger transparency may improve confidence in recognition pathways. However, because the measures do not establish common binding assessment outcomes or EU-wide recognition effects, coherence gains are likely to remain limited and uneven across Member States. Overall, Policy Option 1 is therefore expected to have a limited positive impact (rate: +1) on coherence regarding this objective.
	+1	Overall assessment
Proportionality	-	*Specific Objective 1: Streamlining recognition and validation processes between and within Member States* Under Policy Option 1, the measures introduced to streamline recognition and validation processes consist primarily of non-legislative tools such as mutual-learning programmes, comparative studies, common templates and checklists, benchmarking exercises and dissemination of best practices (B1–B7). From a proportionality perspective, these measures are well targeted to the problem identified in Section 4, namely fragmentation and uneven administrative practices, while imposing only limited additional burdens on Member States or stakeholders. They seek to support improvements through cooperation, peer learning and voluntary alignment rather than mandatory institutional reform. For CAs, participation in exchanges, benchmarking or guidance activities may require some administrative effort, but these obligations are relatively light and can often build on existing networks or fora. This is consistent with focus group evidence from ENIC NARIC centres, PES and CSOs, where most ENIC NARIC centres considered that adoption of new EU-level standards and tools would require only moderate adaptation rather than significant institutional reform,[741] suggesting that incremental EU measures would generally remain manageable in practice.

[738] EU Survey to CAs. Q28: What challenges do you encounter when assessing third-country qualifications? (n=190).
[739] Focus Group of 04 March 2026 on information to TCNs with ENIC NARIC Centres, PES, and CSOs. Breakout room with ENIC NARIC centres, open discussion on Q: "Beyond guidelines which of the following soft measures can be more effective in reducing heterogeneity and fragmentation of procedures among Member States?".
[740] Ibid.
[741] Ibid. Breakout room with ENIC NARIC centres, poll on Q: "What level of effort would your institution/organisation need to adopt new EU-level standards and tools for TCN qualification assessment?"?

Criteria	Rate	Summary of assessment
		For TCNs and employers, the measures do not create new procedural obligations and may generate benefits through clearer and more coherent systems. Focus group evidence with labour migration authorities and IOs further reinforces the proportionality of this approach. A majority of respondents indicated that introducing common EU rules could lead to a moderate to significant reduction in administrative duplication between migration and recognition procedures.[742] This suggests that even without fully binding harmonisation, structured coordination measures can already address key inefficiencies arising from parallel national assessments. Stakeholders also emphasised that proportional benefits would depend on the availability of operational tools and shared reference systems rather than purely legal rules. In particular, it was noted that a common EU framework identifying recognised institutions or authentic document sources could meaningfully reduce current verification gaps, where national authorities often lack a single reference point to confirm the authenticity of diplomas or training institutions.[743] The option also fully respects national competences in organising recognition systems, labour migration procedures and professional regulation, allowing Member States to adapt good practices to national circumstances. Because the measures are light-touch and flexible, there is some risk that impacts may remain limited. However, from a proportionality perspective, the option uses relatively modest instruments to pursue legitimate objectives without imposing excessive constraints. Overall, Policy Option 1 is therefore expected to have a significant positive impact (rate: +3) on proportionality regarding this objective.
	-	*Specific Objective 2: Reduce legal and administrative complexity for recognition and validation of qualifications and skills of third-country nationals* Under Policy Option 1, measures include guidance on procedural steps and indicative timelines (B8), recommendations on documentation and translation requirements (B9), guidance on fees (B10), and improved EU-level information for applicants and employers (B7). From a proportionality perspective, these measures directly target complexity and burden identified in Section 4, while relying on recommendations and information tools rather than binding regulation. They therefore seek to improve systems without imposing substantial compliance costs or rigid common rules. For TCNs, the measures may improve clarity without creating new obligations. For employers, they may reduce uncertainty without adding reporting or procedural burdens. For CAs, guidance may support simplification while preserving discretion to tailor procedures to national legal systems. Focus group evidence supports this balanced approach. Stakeholders from ENIC NARIC centres noted that, while some adaptation effort would be necessary, many systems could integrate common tools through moderate administrative adjustments rather than major restructuring.[744] This indicates that non-binding procedural guidance is likely to remain proportionate relative to the objective pursued.

[742] Focus Group of 02 March 2026 on labour migration with labour migration authorities and International Organisations. Poll on Q: "Would the introduction of common EU rules on the recognition of professional qualifications of third-country nationals reduce administrative duplication between migration and recognition procedures?".
[743] Ibid. Open discussion on Q: "Would the introduction of common EU rules on the recognition of professional qualifications of third-country nationals reduce administrative duplication between migration and recognition procedures?".
[744] Focus Group of 04 March 2026 on information to TCNs with ENIC NARIC Centres, PES, and CSOs. Breakout room with ENIC NARIC centres, open discussion.

Criteria	Rate	Summary of assessment
		The option is also proportionate because it recognises the diversity of national recognition regimes and does not require harmonisation of substantive qualification requirements or labour migration law. While the voluntary nature of the measures may limit impact, the balance between objectives pursued and level of intervention is favourable. Overall, Policy Option 1 is therefore expected to have a significant positive impact (rate: +3) on proportionality regarding this objective.
	-	*Specific Objective 3: Increase trust and understanding of qualifications and skills obtained in third countries* Under Policy Option 1, trust-building measures include authenticity tools and checklists (B11), pre-departure support (B12), comparisons with the European Qualifications Framework (B13), exchanges of information in EU fora (B14), and ETF work on quality assurance transparency (B15). From a proportionality perspective, these measures are well suited to addressing trust deficits identified in Section 4 while avoiding heavy regulatory intervention. They support better evidence, transparency and cooperation rather than imposing mandatory common recognition outcomes or costly new infrastructures. For CAs, these tools may improve decision-making capacity with limited additional burden. For employers, they may strengthen confidence in third-country qualifications without creating obligations. For TCNs, they may improve recognition prospects without requiring new procedural steps beyond existing systems. The measures are also proportionate because they can be implemented progressively, targeted to priority countries or sectors, and adjusted over time depending on needs and evidence. Although their effects may be gradual, the level of intervention remains modest relative to the objective pursued. Overall, Policy Option 1 is therefore expected to have a significant positive impact on proportionality regarding this objective.

Annex 16.3 Assessment of PO 2: Targeted legislative changes and digital improvements

Criteria	Rate	Summary of assessment
Effectiveness	2	*Specific Objective 1: Streamlining recognition and validation processes between and within Member States* Under Policy Option 2, a set of binding common measures is introduced to improve the organisation and functioning of recognition and validation systems across the EU. These measures include common procedural principles, stronger coordination requirements, clearer governance arrangements, and minimum standards for information provision and user pathways. These measures are expected to have a significant positive impact on streamlining processes because, unlike Policy Option 1, they move beyond voluntary coordination and establish enforceable procedural standards applicable across Member States. Compared with Policy Option 1, this option directly addresses structural sources of fragmentation by creating a common procedural framework for how applications are handled, how authorities interact, and what information users must receive. This would likely generate more consistent recognition pathways and reduce the current divergence of practices between and within Member States. As identified in Section 4, current systems are often characterised by fragmentation between authorities, parallel pathways and variable user journeys. Policy Option 2 is

Criteria	Rate	Summary of assessment
		designed to reduce these inefficiencies through more structured and predictable arrangements. For CAs, clearer common rules may support better coordination between recognition bodies, migration authorities, employment services and validation actors. Moreover, these rules may substantially improve clarity of responsibilities and reduce uncertainty regarding the treatment of comparable cases. As evidenced during focus groups, mandatory coordination requirements could be particularly effective in Member States where recognition procedures for regulated professions and labour migration processes currently operate in parallel with limited interaction. By requiring better organisation of national systems, the option may reduce repeated checks, conflicting decisions and avoidable administrative delays. For TCNs, more coherent systems may reduce confusion, improve navigation of procedures. and avoid the duplication of burdens associated with recognition processes in the context of migration and recognition procedures. The introduction of mandatory information requirements is expected to materially improve legal certainty and user experience. Applicants would benefit from clearer and more comparable information across Member States regarding applicable procedures, documentation requirements, expected timelines, fees and appeal rights. This could significantly reduce confusion and the risk of incomplete or misdirected applications. More predictable procedures may also improve confidence in the fairness and accessibility of recognition systems. For employers, especially those operating in several Member States, greater procedural consistency may lower uncertainty and administrative complexity. Evidence from focus groups highlighted the need for more structured approaches and clearer interfaces between authorities, as current fragmentation can delay outcomes and discourage users. More specifically, labour migration authorities and IOs indicated that common EU rules could significantly reduce duplication between migration and recognition procedures, while a strong majority considered EU action necessary to at least a moderate extent to reduce heterogeneity and fragmentation.[745] This suggests that binding common rules would likely be more effective than voluntary guidance in addressing persistent inconsistencies. The focus group with ENIC NARIC centres, PES and civil society organisations also showed broad support for EU-level action to ensure consistency of practices among Member States. While many stakeholders valued soft tools such as best-practice exchange, several also stressed that recommendations alone may not be sufficient where recognition systems are expected to function effectively for labour market purposes.[746] This reinforces the case for a stronger procedural framework under Policy Option 2. However, the effectiveness of the option may still vary depending on national implementation capacity and governance structures. Binding procedural rules can align processes, but they cannot by themselves remove all operational bottlenecks, staffing shortages or differences in substantive qualification requirements. Some diversity in institutional models and national competences would indeed remain, meaning that full convergence is unlikely under this option. In addition, stakeholders emphasised that final decisions on recognition outcomes and professional access should remain at national level, meaning that the option would improve procedures rather than create automatic recognition. Overall, Policy Option 2 is therefore expected to have a moderate positive impact (rate: +2) on achieving this objective.

[745] Focus Group on labour migration with labour migration authorities and International Organisations of 02 March 2026.
[746] Focus Group of 04 March 2026 on information to TCNs with ENIC NARIC Centres, PES, and CSOs.

Criteria	Rate	Summary of assessment
	2	*Specific Objective 2: Reduce legal and administrative complexity for recognition and validation of qualifications and skills of third-country nationals* Under Policy Option 2, binding procedural measures are introduced to simplify and standardise key aspects of recognition and validation processes. These may include clearer procedural guarantees and deadlines, common documentation principles, more proportionate requirements, transparency obligations, and stronger user guidance. Compared with Policy Option 1, these measures are expected to more effectively reduce legal and administrative complexity because they create enforceable obligations rather than relying on recommendations alone. As highlighted in Section 4, current barriers include lengthy procedures, unclear requirements, burdensome documentation requests and unpredictable costs. Policy Option 2 directly targets these obstacles through common procedural guarantees applicable across Member States. For TCNs, the option may significantly improve predictability, reduce unnecessary administrative burdens and shorten waiting times. Binding deadlines for acknowledgement and decision-making would likely reduce prolonged uncertainty and improve applicants' ability to plan employment or further training pathways. Limits on documentation requests may substantially lower compliance costs linked to collecting, certifying or repeatedly resubmitting supporting evidence. Multilingual acceptance rules may also ease access for applicants who currently face additional translation costs or language barriers. Fee caps linked to the actual cost of the service would improve fairness and transparency, particularly for applicants with limited financial resources. In addition, the possibility of compensation measures may also create a clearer pathway in cases where full equivalence cannot be established, allowing applicants to address identified gaps. Focus group evidence with TCNs strongly supports the likely effectiveness of these measures. Participants emphasised that clearer, faster and simpler procedures would make a substantial difference to their ability to rebuild professional careers and access employment corresponding to their qualifications. Delays in recognition were described as a major factor pushing qualified individuals into unrelated or lower-skilled work.[747] This suggests that binding procedural simplification could materially improve both accessibility and labour market outcomes. Stakeholders also noted that digital systems are useful but should ideally be complemented by human support channels such as helplines or case guidance,[748] indicating that procedural reform is most effective when combined with accessible assistance mechanisms. For employers, faster and more transparent procedures may facilitate recruitment planning, reduce uncertainty regarding timelines, and quicker deployment of talent. Moreover, according to the Public Consultation, employers' demand for formal recognition of qualifications is largely shaped by external obligations rather than their own preferences. In particular, recognition is primarily required either to meet regulatory or contractual conditions (such as those associated with public tenders or subsidised contracts) or to ensure the authenticity of qualifications.[749] For CAs, common standards may improve workflow management and reduce repetitive requests or inconsistent handling. Standardised documentation rules and clearer timelines could support more effective case processing and reduce disputes arising from divergent procedures.

[747] Focus Group of 19 March 2026 with TCNs.
[748] Ibid. Open discussion on Q: "Would digital verification of qualifications (i.e. supporting use of digital or AI-powered solutions for verification of documents; requiring issuance of qualifications as verifiable digital credentials) have simplified your recognition process?".
[749] PC Results. Q54: Why do you ask candidates to get their foreign qualifications recognised by a competent authority in your country? (n=20); *in European Commission (2026). Study Supporting an Impact Assessment of EU rules for the recognition of qualifications and validation of skills of third country nationals. Public Consultation Analysis*.

Criteria	Rate	Summary of assessment
		Evidence from focus groups showed strong concern regarding complexity, delays and burdensome administrative requirements. Participants frequently indicated that clearer and more standardised systems would materially improve accessibility and usability.[750] Compared with the softer approach of Policy Option 1, Policy Option 2 is therefore likely to produce more concrete and widespread improvements. However, because national legal frameworks and sector-specific requirements would still differ in some areas, complexity would not be fully eliminated. Overall, Policy Option 2 is therefore expected to have a moderate positive impact (rate: +2) on achieving this objective.
	2	*Specific Objective 3: Increase trust and understanding of qualifications and skills obtained in third countries* Under Policy Option 2, stronger common tools and binding cooperation measures are introduced to improve trust and understanding of third-country qualifications and skills. These may include common reference methodologies, more structured information exchange, enhanced authenticity support tools, and coordinated approaches to comparability assessment. Compared with Policy Option 1, these measures are expected to have a stronger effect because they provide a more systematic framework for cooperation and shared evidence. As noted in Section 4, many authorities currently face uncertainty when assessing third-country qualifications, while employers may lack confidence in the value of credentials obtained abroad. Current challenges include difficulties verifying documents, limited knowledge of third-country curricula and institutions, uneven approaches to comparability assessments, and uncertainty regarding the robustness of quality assurance systems abroad. Policy Option 2 directly targets these barriers through common instruments and mandatory cooperation mechanisms. For CAs, common methodologies and shared information sources may significantly reduce uncertainty and duplication of effort. The EU-level authenticity service could significantly reduce the time and uncertainty associated with verifying diplomas, transcripts and issuing institutions. Instead of each authority conducting separate checks through fragmented bilateral channels, authorities would benefit from a common support mechanism capable of concentrating expertise, reducing duplication and improving reliability. This responds closely to stakeholder concerns during focus groups that current verification systems are resource-intensive and often inconsistent across Member States.[751] The requirement to establish interoperable comparability databases is also expected to materially improve administrative decision-making. Shared access to prior recognition decisions, comparability statements and country-specific information on qualifications systems would enable authorities to rely more frequently on existing evidence rather than reassessing similar qualifications from the beginning. This could progressively create a common knowledge base across the EU, reducing divergence in outcomes and improving consistency of recognition decisions. For TCNs, more trusted systems may improve recognition prospects. Where authenticity can be verified more rapidly and authorities have clearer comparability references, applicants may face fewer repeated evidence requests, shorter delays and more transparent reasoning in decisions. For employers, stronger comparability signals may support

[750] Focus Group of 17 March 2026 with representatives of professional organisations; Focus Group of 19 March 2026 with TCNs.
[751] Focus Group with CAs of 09 March 2026 on access to regulated professions with CAs of crane operators and electricians. Open discussion on Q: “Would common EU-level tools reduce the time and effort needed for your qualification assessments? (examples: shared databases of third-country training programmes, standardised assessment templates, pooled recognition precedents, digital credential verification systems linked to third-country authorities)”.

Criteria	Rate	Summary of assessment
		recruitment decisions and confidence in foreign qualifications. This aligns with the findings of the Public Consultation regarding the validation of skills in the context of TCN recruitment and qualification assessment. The evidence points to a highly heterogeneous landscape across employers, characterised by a strong reliance on documentary evidence, formal recognition or comparability statements, alongside employer-led methods such as interviews, tests and competency-based evaluations. It also indicates that the validation of informal and non-formal learning remains only partially embedded in recruitment practices, with trust still largely grounded in traditional qualifications and formal recognition frameworks.[752] Stakeholder evidence strongly supports the likely effectiveness of these measures. ENIC NARIC centres highlighted the potential benefits of a centralised EU verification mechanism capable not only of confirming authenticity and preventing fraud, but also of providing access to information on quality assurance systems, accreditation status and learning outcomes.[753] Such a mechanism was considered capable of significantly improving both trust and efficiency in recognition procedures. In addition, labour migration authorities and IOs indicated that EU cooperation with third countries is needed at least to a moderate extent to improve recognition outcomes, while structured cooperation frameworks such as Talent Partnerships were widely seen as capable of materially improving recognition outcomes.[754] This suggests that the more formal and systematised tools introduced under Policy Option 2 could build effectively on existing cooperation channels. However, some differences in national assessment approaches and professional regulation would remain, meaning that trust gains may still vary across sectors and Member States. Moreover, the quality and usefulness of authenticity checks, and comparability databases would depend on the cooperation of third-country institutions, data availability, and sustained updating of information systems. In complex or highly regulated professions, authorities may still need case-by-case assessments. Overall, Policy Option 2 is therefore expected to have a moderate positive impact (rate: +2) on achieving this objective.
	-	*Quantitative impact concerning number of recognition cases* Under Policy Option 2, a set of binding common measures is introduced to improve the functioning, transparency and predictability of recognition and validation procedures for TCNs. These include common procedural principles, stronger information obligations, clearer deadlines, proportionate documentation requirements, and more structured cooperation between relevant authorities. Compared with the baseline scenario and Policy Option 1, these measures are expected to generate a moderate increase in the number of recognition and validation cases, as they address more directly the structural barriers identified in Section 4, including fragmented systems, lengthy procedures, unclear requirements and limited trust in foreign qualifications. For TCNs, greater legal certainty and more predictable procedures are expected to increase willingness to apply for recognition or validation.

[752] PC Results. Q53: When recruiting candidates from other countries, what sources of information do you use to identify their skills and qualifications, and do you trust these sources? (n=20); in European Commission (2026). *Study Supporting an Impact Assessment of EU rules for the recognition of qualifications and validation of skills of third country nationals. Public Consultation Analysis*.

[753] Focus Group of 04 March 2026 on information to TCNs with ENIC NARIC Centres, PES, and CSOs. Breakout room with ENIC NARIC centres, open discussion on Q: "To what extent do you think that common EU guidelines, would be necessary to ensure consistency of practices among Member States?".

[754] Focus Group of 02 March 2026 on labour migration with labour migration authorities and International Organisations. Poll on Q and open discussion: "Would structured cooperation agreements with third countries (e.g. Talent Partnerships or bilateral frameworks) materially improve recognition outcomes?".

Criteria	Rate	Summary of assessment
		Clearer timelines, more proportionate documentary requirements and stronger transparency may reduce deterrent effects linked to cost, uncertainty and administrative burden. This may be particularly relevant for qualified individuals who currently postpone or avoid applications because of complexity. For employers, especially in sectors affected by labour shortages, faster and more reliable procedures may increase the use of formal recognition channels when recruiting internationally. More predictable systems can improve workforce planning and reduce the risk that candidates abandon recruitment processes because recognition takes too long. For CAs, clearer common standards and more streamlined procedures may improve case-handling capacity and increase throughput over time, particularly where current systems rely on fragmented workflows or repeated requests for missing information. Evidence from the focus group with employers and labour market stakeholders indicated that lengthy and uncertain recognition procedures discourage recruitment of TCNs and may lead firms to seek alternative hiring strategies[755]. The focus group with individual TCNs similarly highlighted that delays, costs and lack of clarity can discourage applicants from entering the system.[756] Evidence from the Public Consultation also suggests that the availability of information on skills validation does not necessarily translate into effective understanding. Many respondents reported that the information retrieved was often only partially clear or difficult to interpret, while some were unable to access relevant information at all, despite the existence of multiple sources.[757] Regarding support during the validation process, the results indicates that it is often perceived as limited or insufficient, with only a minority of respondents considering it helpful[758]. Overall, these findings suggest that although information on skills validation is formally available through official channels, its accessibility, clarity and usability remain uneven, which may act as a barrier to engagement with validation procedures and contribute to lower uptake among TCNs. Compared with Policy Option 1, the quantitative effect is expected to be stronger because improvements would no longer depend solely on voluntary uptake by Member States. Binding common measures are more likely to produce broader and more consistent increases across the EU. However, the impact is expected to remain moderate rather than transformative. Differences in national labour markets, language requirements, profession-specific rules and migration conditions would continue to influence actual demand for recognition. In addition, some qualified individuals may still face barriers unrelated to recognition procedures themselves. As a result, recognition and validation volumes are expected to rise meaningfully above the baseline trajectory, with stronger effects in sectors and Member States facing persistent shortages or higher inflows of qualified TCNs. In quantitative terms, the moderate positive effect of Policy Option 2 on the volume of recognition applications is expected to translate into an additional flow in the order of three to seven thousand applications per year above the baseline of around 62,500. The figure reflects the binding character of the common procedural measures introduced under this option — in particular, predictable timelines, harmonised documentation requirements, fee structures aligned with the cost of the service, and

[755] Focus Group of 17 March 2026 with representatives of professional organisations.
[756] Focus Group of 19 March 2026 with TCNs.
[757] PC Results. Q36: How clear was the information you found about the requirements for recognition? (n=84); in European Commission (2026). *Study Supporting an Impact Assessment of EU rules for the recognition of qualifications and validation of skills of third country nationals. Public Consultation Analysis*.
[758] PC Results. Q36: How clear was the information you found about the requirements for recognition? (n=84); in European Commission (2026). *Study Supporting an Impact Assessment of EU rules for the recognition of qualifications and validation of skills of third country nationals. Public Consultation Analysis*.

Criteria	Rate	Summary of assessment
		structured cooperation between recognition and migration authorities — which together address several of the procedural deterrents documented in the focus groups, in the dedicated TCN survey (where 49.3 per cent of respondents reported working below their qualification level during the recognition waiting period, in close agreement with the parallel Action 2 quantification on inactivity during recognition) and in the Public Consultation. The activation rate of the latent demand pool under binding common rules is expected to be moderate, in the order of 15 to 25 per cent. The figure is interpreted as a constant additional flow over the medium term, discounted by an implementation factor that reflects the residual transposition discretion left to the Member States. The full methodological architecture is set out in Annex 4.6. Overall, Policy Option 2 is therefore expected to have a moderate positive quantitative impact (rate: +2) on the number of recognition and validation cases.
	2	Overall assessment
Efficiency	2	*Specific Objective 1:* Streamlining recognition and validation processes between and within Member States Under Policy Option 2, binding common measures are introduced to streamline recognition and validation procedures across Member States. These include common procedural rules for authorities assessing qualifications and skills of TCNs (A1), requirements for Member States to coordinate national recognition and validation systems to avoid overlap and duplication (A2), and minimum mandatory information requirements for TCNs and employers (A3). From an efficiency perspective, these measures are expected to generate a positive improvement compared with Policy Option 1, as they move beyond voluntary coordination and create enforceable structural changes capable of reducing repeated administrative effort, procedural inconsistency and unnecessary delays. While Policy Option 1 could support incremental learning, Policy Option 2 directly addresses inefficiencies embedded in the organisation of national systems. More specifically, these measures directly address the fragmentation and institutional complexity identified in Section 4, where responsibilities are often spread across multiple actors, including CAs, migration authorities, ministries, professional regulators and advisory bodies. Such fragmentation can create duplicated steps, inconsistent guidance and avoidable delays. For CAs, clearer coordination obligations and common procedural principles may reduce duplicated assessments, improve referral mechanisms and streamline internal workflows. In turn, this reduces time spent developing separate methodologies for similar cases and handling inconsistent workflows across institutions. During the focus group with labour migration authorities and IOs, the majority of them considered that common EU rules could lead to at least a moderate reduction in administrative duplication between migration and recognition procedures, with a large share expecting significant reductions.[759] This suggests that current fragmentation generates avoidable costs and that common procedural frameworks could materially improve system efficiency. During the same focus group, it was also highlighted that authorities currently conduct verification and assessment checks independently without relying on a common reference framework.[760] By establishing common procedures and coordination duties, Policy Option 2 could reduce these repetitive efforts and enable more efficient use of administrative resources.

[759] Focus Group of 02 March 2026 on labour migration with labour migration authorities and International Organisations. Poll on Q: "Would the introduction of common EU rules on the recognition of professional qualifications of TCNs reduce administrative duplication between migration and recognition procedures?".

[760] Ibid. Open discussion on Q: "Would the introduction of common EU rules on the recognition of professional qualifications of TCNs reduce administrative duplication between migration and recognition procedures?".

Criteria	Rate	Summary of assessment
		For TCNs, more coherent systems may reduce the time and effort required. More specifically, minimum information obligations may significantly reduce search costs, uncertainty and time lost navigating multiple institutions. Clearer information on applicable procedures, required documents, fees, deadlines and appeal rights would help applicants prepare complete files earlier, lowering the incidence of incomplete applications and repeated submissions. This can shorten total processing time and reduce indirect costs or delayed labour market entry. For employers, especially those recruiting internationally, more coordinated systems may improve predictability and reduce delays linked to unclear procedures. Evidence from focus groups strongly support this assessment. Labour migration authorities noted that, in complex national contexts, which involve separate migration and employment qualification assessments, faster and more reliable document verification could accelerate work authorisation decisions.[761] Stakeholders further confirmed that recognition functions and relevant data are often dispersed across institutions, making it unclear where applicants should apply and slowing procedures.[762] This indicates that efficiency gains may extend beyond recognition systems themselves into connected migration procedures. However, some efficiency gains would depend on national implementation choices and the capacity of Member States to adapt existing governance structures. Implementation would also entail adjustment costs. National administrations may need to revise internal workflows and clarify responsibilities between authorities. These transitional costs may temporarily offset some short-term gains. Moreover, because Member States retain competence over substantive qualification requirements, professional regulation and admissions policy, some procedural diversity would remain. Efficiency gains are therefore likely to be strongest in administrative processes rather than in substantive assessment criteria. Overall, Policy Option 2 is expected to have a moderate positive impact (rate: +2) on efficiency regarding this objective.
	2	*Specific Objective 2: Reduce legal and administrative complexity for recognition and validation of qualifications and skills of third-country nationals* Under Policy Option 2, binding measures are introduced to simplify procedures and reduce burdens. These include clear deadlines and procedural guarantees (A4), a common set and maximum number of documents authorities may request (A5), obligations to accept documents in more than one language, including one frequently used by migrants (A6), and common principles ensuring that fees do not exceed the cost of the service provided (A7). From an efficiency perspective, these measures target several major cost and burden drivers identified in Section 4, notably lengthy procedures, unclear timelines, excessive documentation requests, translation burdens and unpredictable fees. Unlike soft guidance, Policy Option 2 creates enforceable simplification mechanisms capable of producing systematic savings across Member States. For TCNs, these measures may reduce direct compliance costs linked to translations, certifications and repeated submissions, as well as indirect costs associated with delayed labour market entry. Limits on documentation requests would lower expenses linked to obtaining certificates, notarisation and repeated submissions. Multilingual acceptance rules may significantly reduce translation costs and administrative friction, especially for applicants who currently need multiple certified translations of the same documents. Transparent and proportionate fee rules would also improve affordability and

[761] Focus Group of 02 March 2026 on labour migration with labour migration authorities and International Organisations. Open discussion.
[762] Focus Group of 14 April 2026 on quality assurance and automatic recognition.

Criteria	Rate	Summary of assessment
		predictability. Evidence from the focus group with TCNs reinforces these expected gains. Participants emphasised that faster and simpler recognition procedures would make a significant difference for people seeking to rebuild their professional lives in Europe. Delays were described as a key factor pushing qualified individuals into jobs below their skill level or outside their professions.[763] This suggests that procedural simplification could generate not only administrative savings, but also major efficiency gains in labour market matching and human capital utilisation. For employers, faster and clearer procedures may reduce vacancy costs, improve recruitment planning and lower the risk of losing candidates during lengthy recognition processes. For CAs, common documentation rules and clearer timelines may reduce incomplete applications, repetitive clarifications and case backlogs. Evidence from focus groups consistently highlighted these burdens. TCNs Stakeholder evidence supports the likely scale of these gains. Labour migration authorities and IOs indicated that binding deadlines, simplified documentation and digital processing would reduce the time needed for TCNs to access qualified employment, with a majority expecting moderate or significant reductions.[764] This suggests that the combination of measures under Policy Option 2 is well aligned with practical bottlenecks experienced by users and administrations. In addition, evidence from ENIC NARIC centres, PES and CSOs showed strong support for EU-level action to provide comprehensive information to applicants on access to regulated professions.[765] Better procedural transparency, when combined with binding guarantees, is likely to reduce avoidable administrative contacts and improve compliance by applicants. Stakeholders also provided concrete examples of inefficiency, including nurses being required to repeat full programmes because of relatively small training gaps, and specialist doctors facing recognition procedures that still do not permit practice in their field.[766] Compared with Policy Option 1, the efficiency gains are expected to be stronger because these measures are binding rather than voluntary. However, some complexity would remain where profession-specific safeguards, language requirements or licensing conditions continue to apply. Overall, Policy Option 2 is expected to have a moderate positive impact (rate: +2) on efficiency regarding this objective.
	2	*Specific Objective 3: Increase trust and understanding of qualifications and skills obtained in third countries* Under Policy Option 2, common mechanisms are introduced to improve trust, transparency and comparability. These include an EU-level service for authenticity checks on formal qualifications issued in third countries (A8), interoperable national databases on comparability of third-country qualifications and previous recognition decisions (A9), and the possibility for Member States to apply compensation measures where justified doubts remain regarding quality or training standards (A10). From an efficiency perspective, these measures are expected to have a positive impact because they directly target some of the most resource-intensive stages of recognition procedures, reduce duplicated verification work and lower the resource intensity of assessing unfamiliar qualifications. As identified in Section 4, authorities often need to assess

[763] Focus Group of 19 March 2026 with TCNs. Open discussion on Q: “If recognition procedures were simpler and faster, how would this affect your plans for your career in the EU?”.
[764] Focus Group of 02 March 2026 on labour migration with labour migration authorities and International Organisations. Poll on Q: “Would binding deadlines, simplified documentation, and digital processing reduce the time to access qualified employment for TCNs?”.
[765] Focus Group of 04 March 2026 on information to TCNs with ENIC NARIC Centres, PES, and CSOs.
[766] Focus Group of 14 April 2026 on quality assurance and automatic recognition. Open discussion on Q: “Based on your experience, to what extent does the recognition of foreign qualifications hamper the recruitment of talent from outside the EU?”.

Criteria	Rate	Summary of assessment
		foreign institutions, programmes and qualifications with limited access to trusted information, leading to repeated checks and inconsistent outcomes. For CAs, authenticity tools and interoperable databases may reduce time spent manually verifying documents through fragmented bilateral contacts, researching foreign education systems and repeating assessments already undertaken elsewhere. Instead of each authority independently repeating similar checks, a shared verification mechanism could centralise expertise, standardise methods and accelerate responses. This would be particularly valuable for complex or higher-risk cases where authenticity concerns currently create long processing times. During focus groups, ENIC NARIC centres highlighted the potential value of a centralised EU verification mechanism for credential authenticity, fraud prevention, accreditation status and programme learning outcomes.[767] Such a mechanism was seen as capable of significantly improving efficiency by replacing repetitive national verification efforts with a common resource base. The obligation to establish interoperable comparability databases under A9 is also likely to produce substantial savings. Authorities would be able to consult comparability statements and structured information on foreign education systems. Over time, this could reduce duplication across Member States, improve consistency and shorten case-handling times, especially for frequently encountered qualifications. For TCNs, stronger trust mechanisms may reduce repeated requests for evidence and shorten parts of the recognition process. For employers, clearer comparability signals may support quicker and more confident recruitment decisions. Evidence across focus groups supports this logic. Labour migration authorities and IOs widely considered that structured cooperation frameworks with third countries could materially improve recognition outcomes, and many expected that effective cooperation with key third countries could reduce verification-related delays by 10–25% or more.[768] This suggests that combining internal EU systems with stronger external cooperation could generate substantial operational efficiencies. Moreover, stakeholders repeatedly referred to the absence of systems comparable to IMI for third-country qualifications, the potential value of resources such as DEQAR, and the importance of reusing existing recognition data rather than starting from zero.[769] However, these systems would require initial investment, effective governance arrangements and sustained data quality. Some assessments would also remain case-specific, particularly in sensitive professions. Benefits may therefore build progressively rather than immediately. In addition, for highly specialised qualifications, some individual assessment work would still remain necessary. Overall, Policy Option 2 is expected to have a moderate positive impact (rate: +2) on efficiency regarding this objective.
	2	*Quantitative impact concerning costs associated with baseline scenario* Under Policy Option 2, a set of binding common measures is introduced to simplify procedures, improve coordination and strengthen trust in third-country qualifications. These include common procedural rules and coordination requirements (A1–A3), clear deadlines and procedural guarantees (A4), common documentation rules (A5), multilingual document acceptance (A6), proportionate fee principles (A7), and common tools for authenticity checks and comparability (A8–A10).

[767] Focus Group of 04 March 2026 on information to TCNs with ENIC NARIC Centres, PES, and CSOs. Breakout room with ENIC NARIC centres, open discussion on Q: “To what extent do you think that common EU guidelines, would be necessary to ensure consistency of practices among Member States?”.
[768] Focus Group of 02 March 2026 on labour migration with labour migration authorities and International Organisations. Poll on Q: “If effective cooperation frameworks were in place with key third countries, by how much could verification-related delays be reduced?”.
[769] Focus Group of 14 April 2026 on quality assurance and automatic recognition.

Criteria	Rate	Summary of assessment
		As highlighted in Section 4, the current system can generate substantial direct and indirect costs for TCNs, employers and CAs. These include application fees, translation and certification costs, repeated submissions, lengthy waiting periods, delayed labour market entry, recruitment bottlenecks and resource-intensive case-by-case assessments. In this respect, the survey with competent authorities provides evidence on the types of costs most commonly borne by third-country nationals in practice: the most frequently reported cost is the translation of documents (65.4%), followed by application fees (56.5%) and authentication or legalisation of documents (40.8%). Additional costs related to training, exams or tests are reported by 39.3% of respondents, while 6.3% mention the requirement for a declaration of value.[770] Policy Option 2 is expected to reduce these costs to a moderate extent, more clearly than Policy Option 1, because many improvements would become binding across Member States rather than remaining voluntary. For TCNs, common documentation limits, multilingual acceptance of documents, clearer deadlines and proportionate fee rules may significantly reduce compliance costs. Fewer repeated requests and shorter processing times may also lower opportunity costs linked to delayed employment or underemployment. For employers, especially in shortage sectors, more predictable and faster procedures may reduce vacancy costs, repeated recruitment cycles and the loss of candidates during lengthy recognition processes. Greater transparency may also lower search and legal uncertainty costs when hiring internationally. For CAs, clearer common rules and shared trust tools may reduce administrative effort per case. Interoperable databases, authenticity services and more standardised procedures may lower workloads associated with repetitive document verification, incomplete applications and duplicated assessments across institutions. Evidence from focus groups consistently supports this assessment. TCNs reported significant costs linked to translations, documentation and delays.[771] Employers stressed that slow recognition procedures create business costs and reduce responsiveness to labour shortages.[772] Public authorities referred to the resource-intensive nature of case-by-case assessments and fragmented systems.[773] Key stakeholders further highlighted inefficiencies such as requiring candidates to repeat full programmes for limited training gaps and the absence of shared verification systems comparable to IMI.[774] However, Policy Option 2 would also entail implementation costs. Member States may need to adapt administrative systems, update procedures, train staff, improve digital infrastructure and coordinate across institutions. Initial investment costs are therefore likely, particularly in Member States starting from more fragmented systems. Over time, these adjustment costs are expected to be offset, at least in part, by recurring efficiency gains and lower administrative burdens. Overall, Policy Option 2 is therefore expected to have a moderate positive quantitative impact (rate: +2) on costs associated with recognition and validation procedures, reflecting meaningful net efficiency gains after transitional implementation efforts.
	2	Overall assessment
Coherence	2	*Specific Objective 1: Streamlining recognition and validation processes between and within Member States*

[770] EU Survey to CAs. Q17: What type of costs are typically incurred by third country nationals for recognition of qualifications? (n=190).
[771] Focus Group of 19 March 2026 with TCNs.
[772] Focus Group of 17 March 2026 with representatives of professional organisations.
[773] Focus Group of 02 March 2026 on labour migration with labour migration authorities and International Organisations.
[774] Focus Group of 14 April 2026 on quality assurance and automatic recognition.

Criteria	Rate	Summary of assessment
		Under Policy Option 2, binding common measures are introduced to improve coordination, governance and procedural consistency across Member States. These include common procedural rules for relevant authorities (A1), requirements to coordinate national recognition and validation systems and avoid overlap (A2), and minimum mandatory information requirements for applicants and employers (A3). These measures are expected to have a positive impact because they directly address the fragmentation and unclear institutional interfaces identified in Section 4. Unlike Policy Option 1, which relied on voluntary convergence, Policy Option 2 introduces common baseline obligations that can reduce contradictions, overlaps and inconsistencies between institutions and across Member States. From an internal coherence perspective, these measures are strongly aligned with the objective of streamlining processes, as they directly address the fragmentation and unclear institutional interfaces identified in Section 4. Compared with Policy Option 1, they create a more consistent EU framework rather than relying only on voluntary convergence. By requiring common procedural logic while preserving national competence over substantive decisions, the option creates a clearer and more coherent framework for handling third-country qualifications. Measures introduced under this policy option establish a shared procedural structure for assessments that are currently organised in different ways. This can reduce situations where similar qualifications are treated through entirely different processes depending on the Member State concerned. Rules for Member States to organise and coordinated national systems for recognition further strengthen coherence by addressing fragmentation within Member States, especially where migration, labour market access and professional recognition are managed by separate authorities with limited coordination. From an external coherence perspective, this policy option is broadly consistent with wider EU priorities relating to labour mobility, skills utilisation, competitiveness and talent attraction. It complements existing initiatives such as the European Commission, Talent Partnerships and broader legal migration policies by addressing procedural bottlenecks after admission pathways have been opened. More coherent recognition systems would also support broader EU strategies addressing labour shortages and inclusion by making it easier for qualified TCNs to contribute according to their skills. During focus groups with labour migration authorities and IOs, participants noted that harmonisation or common minimum standards could encourage more consistent implementation across Member States and reduce divergence in national approaches.[775] For TCNs, greater coherence between migration, recognition and validation pathways may improve the usability of existing legal channels. For employers, better alignment between recruitment objectives and recognition systems may facilitate access to talent. For CAs, clearer interfaces between institutions may improve policy consistency and operational coordination. Evidence from focus group with key stakeholders[776] confirmed that fragmented responsibilities and dispersed procedures weaken the effectiveness of broader labour migration efforts. However, some divergence would remain because Member States would continue to operate different institutional models and profession-specific arrangements.

[775] Focus Group of 02 March 2026 on labour migration with labour migration authorities and International Organisations. Open discussion on poll on Q: “To what extent EU action is needed, compared to what can be achieved by Member States acting alone, to reduce heterogeneity and fragmentation in the recognition of professional qualifications of TCNs?”.
[776] Focus Group of 14 April 2026 on quality assurance and automatic recognition.

Criteria	Rate	Summary of assessment
		Overall, Policy Option 2 is therefore expected to have a moderate positive impact (rate: +2) on coherence regarding this objective.
	2	*Specific Objective 2: Reduce legal and administrative complexity for recognition and validation of qualifications and skills of third-country nationals* Under Policy Option 2, binding simplification measures are introduced, including procedural guarantees and deadlines (A4), common documentation rules (A5), multilingual document acceptance (A6), and proportionate fee principles (A7). From an internal coherence perspective, these actions are strongly aligned with the objective of reducing legal and administrative complexity because they directly target several barriers identified in Section 4, including lengthy procedures, excessive or unclear document requirements, language barriers, and unpredictable fees. Unlike Policy Option 1, which relies on guidance and voluntary simplification, Policy Option 2 translates these objectives into enforceable standards applicable across Member States. From an external coherence perspective, the option supports broader EU policy goals linked to labour shortages, competitiveness and faster labour market integration of legally residing TCNs. By reducing unnecessary procedural barriers, the option supports the objectives of, for instance, the Skills and Talent Mobility Package and broader EU efforts to address shortages in key sectors. It is also coherent with initiatives promoting simplification of administrative procedures and better functioning of the Single Market labour ecosystem. The policy option also addresses stakeholder evidence stressing that recognition policy cannot operate in isolation from employment and migration systems. ENIC NARIC centres, PES, CSOs, and representatives of professional organisations underlined that recognition outcomes are closely linked to labour market access, validation pathways and integration measures.[777] Therefore, this suggests that binding simplification rules would improve coherence not only within recognition systems, but also between recognition procedures and broader labour migration pathways. For TCNs, clearer and more predictable systems may improve access to recognition pathways. For employers, better alignment between recruitment needs and administrative procedures may reduce friction. For CAs, common procedural standards may support more consistent administration. Focus groups repeatedly highlighted that current complexity undermines both user experience and broader labour market objectives.[778] However, some complexity linked to sector-specific safeguards, licensing rules or language requirements would remain outside the scope of common procedural rules. Overall, Policy Option 2 is therefore expected to have a moderate positive impact (rate: +2) on coherence regarding this objective.
	2	*Specific Objective 3: Increase trust and understanding of qualifications and skills obtained in third countries* Under Policy Option 2, common mechanisms are introduced to strengthen trust, transparency and comparability in the assessment of qualifications and skills obtained in third countries. These include an EU-level authenticity check service (A8), interoperable databases on comparability and previous recognition decisions (A9), and safeguards allowing compensation measures where justified doubts remain (A10).

[777] Focus Group of 04 March 2026 on information to TCNs with ENIC NARIC Centres, PES, and CSOs; Focus Group of 17 March 2026 with representatives of professional organisations.
[778] Focus Group of 19 March 2026 with TCNs; Focus Group of 17 March 2026 with representatives of professional organisations; Focus Group of 14 April 2026 on quality assurance and automatic recognition.

Criteria	Rate	Summary of assessment
		From an internal coherence perspective, these measures are well aligned with the objective of increasing trust and understanding, as they directly address the lack of reliable information, uneven comparability approaches and authenticity concerns identified in Section 4. Unlike Policy Option 1, which mainly improves cooperation through voluntary tools and exchanges, Policy Option 2 establishes a more structured and enforceable framework. From an external coherence perspective, the option is coherent with wider EU transparency and skills-portability instruments, including the European Qualifications Framework, and with broader efforts to improve evidence-based migration governance. It also complements international cooperation efforts involving qualifications recognition networks and education quality frameworks. For CAs, stronger shared tools may improve consistency of assessments. For employers, greater confidence in qualifications obtained abroad may support recruitment decisions. For TCNs, stronger trust systems may improve predictability and recognition prospects. Stakeholder consultations provide further support for the analysis. ENIC NARIC centres and CAs highlighted the potential added value of a more centralised EU mechanism for authenticity checks and access to reliable information on quality assurance, accreditation and learning outcomes.[779] Labour migration authorities and IOs also considered structured cooperation with third countries capable of improving recognition outcomes, particularly where recognition processes are embedded in broader skills partnerships.[780] Thus, policy option 2 would increase coherence by connecting such external cooperation initiatives with a common internal procedural framework. Finally, stakeholders reinforced the relevance of existing quality-assurance resources such as DEQAR, ESG-aligned systems and trusted review approaches, while emphasising the need to build on existing structures rather than create parallel systems.[781] However, differences in national risk tolerance, sector regulation and final decision-making powers would remain. Overall, Policy Option 2 is therefore expected to have a moderate positive impact (rate: +2) on coherence regarding this objective.
	2	Overall assessment
Proportionality	-	*Specific Objective 1: Streamlining recognition and validation processes between and within Member States* Under Policy Option 2, binding common measures are introduced to improve coordination, reduce duplication and streamline recognition and validation systems. These include common procedural rules for relevant authorities (A1), requirements to coordinate national systems and avoid overlap (A2), and minimum information obligations for applicants and employers (A3). From a proportionality perspective, these measures go further than Policy Option 1 because they create binding obligations rather than relying solely on voluntary cooperation. This increases the likelihood of achieving meaningful change in response to the fragmentation identified in Section 4. At the same time, the intervention remains targeted , as it establishes minimum harmonised rules while leaving

[779] Focus Group of 04 March 2026 on information to TCNs with ENIC NARIC Centres, PES, and CSOs. Breakout room with ENIC NARIC centres. Open discussion on Q: "To what extent do you think that common EU guidelines, would be necessary to ensure consistency of practices among Member States?".
[780] Focus Group of 02 March 2026 on labour migration with labour migration authorities and International Organisations. Open discussion on Q: "Would structured cooperation agreements with third countries (e.g. Talent Partnerships or bilateral frameworks) materially improve recognition outcomes?".
[781] Focus Group of 19 March 2026 with TCNs.

Criteria	Rate	Summary of assessment
		Member States flexibility to maintain or develop more beneficial or advanced systems. This also helps reduce adaptation costs for Member States with already well-functioning arrangements. The option does not harmonise substantive qualification standards, professional regulation or the internal organisation of national authorities. Member States retain discretion over institutional design, provided that common objectives on coordination and transparency are met. For CAs and migration authorities, some adjustment effort would be required to improve cooperation mechanisms and revise workflows. This may involve moderate implementation costs, including legislative amendments, internal workflow redesign and digital or administrative upgrades. For TCNs and employers, the measures mainly create benefits through clearer systems rather than additional obligations. Evidence from focus groups confirmed that fragmentation is a real structural problem, suggesting that stronger measures than soft coordination may be justified.[782] Overall, Policy Option 2 is therefore expected to have a moderate positive impact (rate: +2) on proportionality regarding this objective, balancing stronger intervention with continued national flexibility.
	-	*Specific Objective 2: Reduce legal and administrative complexity for recognition and validation of qualifications and skills of third-country nationals* Under Policy Option 2, binding simplification measures are introduced, including procedural guarantees and deadlines (A4), common documentation rules (A5), multilingual document acceptance (A6), and proportionate fee principles (A7). From a proportionality perspective, these measures directly target burdens identified in Section 4, such as delays, excessive documentation requests, translation costs and unclear fees. Binding action may therefore be justified where voluntary guidance alone would not ensure consistent simplification across Member States. The measures remain proportionate because they focus on procedural aspects rather than substantive recognition decisions. They do not remove legitimate safeguards linked to professional standards, public safety or licensing requirements, and Member States would retain scope to apply justified sector-specific conditions. Furthermore, they do not affect migration decision-making as such, as they have no impact on the issuance of residence permits or work authorisations, which remain fully within the competence of Member States under applicable migration frameworks. For TCNs, the measures may reduce burdens without creating new significant obligations. Clear deadlines, capped documentation requests, broader language acceptance and transparent fees would reduce unnecessary costs, delays and uncertainty without imposing additional obligations on applicants. On the contrary, the option would primarily remove obstacles that currently prevent effective use of their qualifications. For employers, they may improve usability of the system without additional compliance costs. For CAs and migration authorities, some implementation effort would be required, but within a clearly targeted scope. During the focus group. ENIC NARIC centres, PES and CSOs indicated that adapting to new EU standards and tools

[782] Focus Group of 02 March 2026 on labour migration with labour migration authorities and International Organisations; Focus Group of 19 March 2026 with TCNs.

Criteria	Rate	Summary of assessment
		would often require moderate administrative effort over several months rather than deep institutional reform.[783] This suggests that implementation burdens are meaningful but generally manageable. Focus groups (repeatedly highlighted the material burden imposed by current complexity, suggesting that stronger common intervention may be warranted.[784] In line with this, evidence from the Public Consultation demonstrates broad support for EU-level action to simplify recognition and validation procedures for qualifications and skills acquired outside the EU. A large majority of respondents consider such action as very necessary, while only a small minority do not support EU-level intervention.[785] Overall, Policy Option 2 is therefore expected to have a moderate positive impact (rate: +2) on proportionality regarding this objective.
	-	*Specific Objective 3: Increase trust and understanding of qualifications and skills obtained in third countries* Under Policy Option 2, common trust-building mechanisms are introduced, including an EU-level authenticity service (A8), interoperable databases on comparability and recognition decisions (A9), and safeguards allowing compensation measures where justified doubts remain (A10). From a proportionality perspective, these measures respond to the information deficits and trust concerns identified in Section 4 while remaining less intrusive than full automatic recognition or centralised EU decision-making. Indeed, they are targeted at identified systemic shortcomings, namely fragmented verification practices, limited access to reliable information on third-country systems, and inconsistent approaches to quality assurance concerns, which cannot be fully addressed through voluntary cooperation alone. The option is proportionate because it supports national authorities with common tools rather than replacing their final decision-making powers. Member States would continue to assess cases and retain safeguards where necessary, while benefiting from shared infrastructure and evidence. For CAs, this may create implementation and cooperation obligations, but these are linked to clear operational needs. Focus groups' evidence suggests that authorities recognise the need for more solid verification tools and shared information systems.[786] This is also consistent with broader consultation findings showing that 60% of CAs identify verification of the authenticity of TC qualifications as a key challenge[787], a pattern also confirmed by almost 90% of ENIC-NARIC centres[788].

[783] Focus Group of 04 March 2026 on information to TCNs with ENIC NARIC Centres, PES, and CSOs. Breakout room with ENIC NARIC centres. Open discussion on Q: "What level of effort would your institution/organisation need to adopt new EU-level standards and tools for TCN qualification assessment?".

[784] Focus Group of 02 March 2026 on labour migration with labour migration authorities and International Organisations; Focus Group of 04 March 2026 on information to TCNs with ENIC NARIC Centres, PES, and CSOs; Focus Group of 19 March 2026 with TCNs.

[785] PC Results. To what extent do you think EU-level action is necessary to simplify the way in which people who have acquired qualifications or skills outside the EU can get them recognised in the EU so that they can access the EU labour market? (n=486); in European Commission (2026). *Study Supporting an Impact Assessment of EU rules for the recognition of qualifications and validation of skills of third country nationals. Public Consultation Analysis*.

[786] Focus Group with CAs of 09 March 2026 on access to regulated professions with CAs of crane operators and electricians. Open discussion on Q: "Would common EU-level tools reduce the time and effort needed for your qualification assessments? (examples: shared databases of third-country training programmes, standardised assessment templates, pooled recognition precedents, digital credential verification systems linked to third-country authorities)".

787 Survey targeted at CAs, Q28: "What challenges do you encounter when assessing TCQs?" n=190

788 Survey targeted at ENIC-NARIC centres, Q26: "What are the main challenges your NARIC centre faces in recognising qualifications or validating skills of TCNs?" n=18.

Criteria	Rate	Summary of assessment
		Authorities further report particular difficulties in verifying documents from countries with weak administrative systems or conflict-affected contexts, as well as cases involving fraudulent documents and diploma mills[789]. In addition, survey evidence indicates that trust in third-country qualification evidence is only moderate or low for around 60.5% of CAs[790], reinforcing that these concerns are widespread and structurally embedded in current recognition practices. In this context, the additional burden can be seen as proportionate to the expected gains in reliability, consistency and efficiency. For employers and TCNs, stronger trust tools may improve outcomes without imposing major additional burdens. During focus groups, stakeholders also strongly supported building on existing quality-assurance frameworks and databases rather than creating entirely new structures, reinforcing the proportionality of a targeted support model[791]. However, some proportionality risks remain. The creation and maintenance of interoperable databases and EU-level verification services may entail some costs and require sustained cooperation, including with third countries. Implementation capacity may vary across Member States, and benefits may materialise gradually. In addition, it must be taken into consideration that rigid application of compensation measures could, if not carefully balanced, create additional barriers. Overall, Policy Option 2 is therefore expected to have a moderate positive impact on proportionality regarding this objective.

Annex 16.4 Assessment of PO 3: Comprehensive reform and digital by default

Criteria	Rate	Summary of assessment
Effectiveness	3	*Specific Objective 1: Streamlining recognition and validation processes between and within Member States* Under Policy Option 3, the measures included under Policy Option 2 are complemented by a more ambitious EU-level framework providing automatic or highly facilitated recognition for selected professions where common EU minimum training requirements already exist, supported by trusted review mechanisms and stronger shared governance arrangements. This option is expected to have the strongest effect on streamlining processes because it addresses fragmentation not only through common procedural rules, but also by reducing the need for repeated national recognition assessments for selected categories of applicants. Indeed, for qualifications covered by the automatic recognition framework, differences in national procedures would no longer lead to divergent outcomes, as recognition would be granted based on common EU-level

789 Bilateral meetings between the European Commission and Member States on the recognition of qualifications of third country nationals; Focus Group on access to regulated professions with CAs of electricians and crane operators (n=20); Focus Group on information support to TCNs with ENIC NARIC centres and PES (n=37) ; Bilateral meetings between the European Commission and Member States on the recognition of qualifications of third country nationals.

790 Survey targeted at CAs, Q15: “To what extent do you trust evidence and documents related to TCQs?” n=190

791 Focus Group of 14 April 2026 on quality assurance and automatic recognition.

Criteria	Rate	Summary of assessment
		validation. This would significantly reduce one of the core drivers of fragmentation identified through evidence, namely the repeated and inconsistent assessment of same qualifications across Member States. As identified in Section 4, current systems are characterised by parallel procedures, multiple CAs and significant divergence between Member States. Policy Option 3 would substantially reduce these frictions in areas covered by the scheme. For CAs, upstream assessment or trusted review mechanisms may significantly reduce workload linked to repetitive case-by-case recognition decisions. Evidence from focus groups indicates that duplication of assessment procedures is a key source of ineffectiveness;[792] therefore, removing these steps for a subset of qualifications could materially streamline workflows. Moreover, CAs expressed clear interest in digital credential verification systems linked to issuing institutions abroad, considering them a potentially valuable means of strengthening traceability and authenticity[793]. For TCNs, more automatic pathways may greatly simplify navigation of the system and reduce uncertainty regarding where and how to apply. The existence of a public register would allow applicants to clearly understand whether their qualification qualifies for automatic recognition, reducing confusion and unnecessary applications. This directly responds to TCNs feedback highlighting the importance of clear, accessible and reliable information[794]. Moreover, faster recognition would have a tangible impact on labour market integration, reducing the risk of skills mismatch and underemployment caused by lengthy or uncertain procedures. For employers, especially those recruiting across several Member States, more uniform pathways may substantially improve predictability. Evidence across focus groups supports this conclusion. Information-focused stakeholders pointed to dispersed access points and unclear pathways for applicants.[795] Participants further confirmed that fragmentation across 27 Member States weakens EU attractiveness and that existing recognition records should be used more systematically rather than restarting assessments case by case[796]. However, at the same time, during focus groups stakeholders also indicated that the feasibility of automatic recognition would be uneven across professions and countries. In particular, competent authorities and professional organisations highlighted that its practical implementation would require a substantial expansion of knowledge about third-country education and training systems, due to the significant variation in curricula, internship structures, and exposure of the profession across countries[797]. During the focus group it emerges that, for CAs the feasibility of automatic recognition based on common standards is perceived as limited in most cases. 39% of respondents considered it not feasible, while 44% indicated that it would only be feasible with additional safeguards such as testing or adaptation periods, and 17% considered it feasible only for a limited number of trusted training systems. No respondents considered

[792] Focus Group of 02 March 2026 on labour migration with labour migration authorities and International Organisations.

793 Focus Group of 13 March 2026 with CAs and EU professional organisations in the healthcare sector. Poll Q: “Which measures would most reduce the time needed to assess applications?” and open discussion on “Would common EU-level tools reduce the time and effort needed for your qualification assessments? (examples: shared databases of third-country training programmes, standardised assessment templates, pooled recognition precedents, digital credential verification systems linked to third-country authorities)”.

[794] Focus Group of 19 March 2026 with TCNs.

[795] Focus Group of 04 March 2026 on information to TCNs with ENIC NARIC Centres, PES, and CSOs.

[796] Focus Group of 14 April 2026 on quality assurance and automatic recognition.

[797] Focus Group of 13 March 2026 with CAs and EU professional organisations in the healthcare sector. Open discussion on Q: “How feasible would automatic recognition (based on compliance with agreed common standards) be for some third-country qualifications in your sector?”.

Criteria	Rate	Summary of assessment
		it broadly feasible.[798] This suggests that while harmonisation and convergence may be achievable in a limited set of cases, effective implementation generally requires complementary mechanisms to assess competencies, such as tests or adaptation periods, in order to ensure labour market relevance and trust in outcomes. In this way, effectiveness is conditional on the availability of solid and continuously updated comparative knowledge frameworks. Stakeholders also emphasised that even where qualification frameworks exist, differences in post-qualification practice environments may limit direct comparability of professional competence, particularly in healthcare. This indicates that effectiveness may be higher for professions with more standardised training structures, while remaining more limited in highly practice-intensive fields such as specialist medicine[799]. Overall, Policy Option 3 is therefore expected to have a significant positive impact (rate: +3) on achieving this objective.
	3	*Specific Objective 2: Reduce legal and administrative complexity for recognition and validation of qualifications and skills of third-country nationals* Under Policy Option 3, the procedural simplification measures of Policy Option 2 are combined with automatic or highly facilitated recognition routes for selected professions. This could substantially reduce the need for repeated documentary assessments, lengthy case-by-case evaluations and multiple national procedures for eligible applicants. Compared with Policy Option 2, this option is expected to generate the strongest reduction in legal and administrative complexity because, for covered professions, it shifts the system from repeated individual recognition towards pre-assessed or commonly trusted pathways. For TCNs, this may significantly reduce waiting times, documentation burdens, uncertainty and costs. Instead of navigating complex, often repetitive procedures with uncertain outcomes, applicants would benefit from immediate or near-automatic recognition, subject only to verification of eligibility conditions. Compared to Policy Option 2, where simplification is achieved through better rules, Policy Option 3 removes complexity at its source for a defined set of professions. As highlighted in focus group discussions with TCNs, delays and procedural opacity are key barriers preventing individuals from accessing employment aligned with their qualifications[800]. In this context, automatic recognition could transform career trajectories by enabling faster entry into regulated professions and reducing the risk of skills underutilisation. For employers, especially in shortage sectors, it may materially improve speed and predictability of recruitment. For CAs, resources could be reallocated away from routine cases towards more complex files or enforcement tasks. At the same time, the introduction of an EU-level verification service and interoperable systems would significantly reduce duplication of verification tasks, which has been identified as a key inefficiency by authorities. Evidence from several focus groups illustrates the current burden. Individual TCNs reported costs, delays and difficulty navigating procedures.[801] Employers highlighted that lengthy recognition processes can delay recruitment and lead to loss of candidates.[802] Healthcare stakeholders stressed the operational need for faster access to qualified professionals[803]. Other participants added concrete examples, including nurses required to repeat full programmes because of limited training

[798] Ibid. Poll on Q: "How feasible would automatic recognition (based on compliance with agreed common standards) be for some third-country qualifications in your sector?".
[799] Ibid.
[800] Focus Group of 19 March 2026 with TCNs.
[801] Ibid.
[802] Focus Group of 17 March 2026 with representatives of professional organisations.
[803] Focus Group of 13 March 2026 with CAs and EU professional organisations in the healthcare sector.

Criteria	Rate	Summary of assessment
		gaps and specialist doctors unable to practise in their field despite existing qualifications[804]. However, some administrative complexity would remain, particularly regarding language requirements, licensing conditions, professional registration or cases outside the scope of automatic recognition. Overall, Policy Option 3 is therefore expected to have a significant positive impact (rate: +3) on achieving this objective.
	3	*Specific Objective 3: Increase trust and understanding of qualifications and skills obtained in third countries* Under Policy Option 3, Policy Option 2 trust-building tools are reinforced through trusted review bodies, structured quality-assurance assessments, possible lists of recognised institutions or programmes, and more systematic use of existing EU and international quality-assurance frameworks to underpin automatic recognition decisions for selected professions. This option is expected to have the strongest effect on trust and understanding because it creates an operational system in which trust is institutionalised through ex ante assessment mechanisms rather than relying only on ad hoc case-by-case judgments. For CAs, common trusted review processes may substantially reduce uncertainty regarding the quality of institutions, programmes and qualifications. For TCNs, stronger and more transparent trust systems may improve predictability and confidence in recognition pathways. For employers, clearer signals on qualification quality and comparability may significantly support recruitment decisions. Stakeholder evidence through focus groups strongly supports the potential effectiveness of such an approach, as it emerged strong interest in centralised verification mechanisms, digital credentials and structured cooperation with third countries. In particular, ENIC NARIC centres emphasised that a centralised EU mechanism providing reliable information on quality assurance and learning outcomes could significantly improve trust.[805] Similarly, labour migration authorities and IOs underlined that structured cooperation frameworks, when linked to recognition systems, can materially improve outcomes.[806] Policy Option 3 builds on these insights by integrating verification, transparency and cooperation into a single coherent system. Other participants added detailed references to existing resources such as European Quality Assurance Register for Higher Education, DEQAR, ESG-aligned systems, the World Federation for Medical Education and other international frameworks, while stressing that building on existing trusted structures would be preferable to creating parallel systems[807]. However, trust gains would depend on robust governance, sufficient resources and clearly defined scope. In some sectors or countries, further case-specific safeguards may still be needed. Overall, Policy Option 3 is therefore expected to have a significant positive impact (rate: +3) on achieving this objective.
	-	*Quantitative impact concerning number of recognition cases* Under Policy Option 3, the procedural improvements introduced under Policy Option 2 are complemented by automatic or highly facilitated recognition pathways for selected professions where common EU minimum training requirements already exist, supported by trusted review mechanisms and stronger comparability tools.

[804] Focus Group of 14 April 2026 on quality assurance and automatic recognition.
[805] Focus Group of 04 March 2026 on information to TCNs with ENIC NARIC Centres, PES, and CSOs. Breakout room with ENIC NARIC centres. Open discussion on Q: “To what extent do you think that common EU guidelines, would be necessary to ensure consistency of practices among Member States?”.
[806] Focus Group of 02 March 2026 on labour migration with labour migration authorities and International Organisations.
[807] Focus Group of 14 April 2026 on quality assurance and automatic recognition.

Criteria	Rate	Summary of assessment
		Compared with the baseline scenario, Policy Option 1 and Policy Option 2, this option is expected to generate the strongest increase in the number of recognition and validation cases. By substantially reducing uncertainty, administrative burden and processing time for eligible applicants, it would make formal recognition pathways significantly more attractive and accessible. As identified in Section 4, many qualified TCNs currently face barriers that discourage them from applying for recognition, including lengthy procedures, high documentation burdens, unpredictable outcomes and fragmented systems. Policy Option 3 addresses these barriers more directly than other options by replacing repeated case-by-case assessments with more automatic or pre-assessed pathways in selected professions. For TCNs, the existence of clearer and faster routes is expected to increase willingness to apply, particularly among professionals who currently avoid recognition because the expected costs and delays outweigh potential benefits. This may be especially relevant for regulated professions with strong labour demand. For employers, especially in sectors facing shortages such as healthcare, architecture or veterinary services, more predictable recognition pathways may increase the use of international recruitment channels and encourage stronger demand for recognised third-country professionals. For CAs, streamlined processing and upstream assessments may increase system throughput and allow resources to focus on more complex or exceptional cases, thereby increasing the number of cases that can be processed efficiently. Evidence across focus groups supports this conclusion. Employers highlighted that uncertainty and delays discourage recruitment of TCNs[808]. TCNs referred to costs and procedural obstacles that deter applications[809]. Stakeholders also showed that participants expected automatic recognition to improve recruitment capacity, while identifying nurses and doctors as the professions where such measures could make the most meaningful contribution to labour shortages[810]. Compared with Policy Option 2, the quantitative effect is expected to be stronger because eligible applicants would no longer depend only on better procedures, but on fundamentally simplified recognition outcomes. However, the impact would be concentrated in professions and countries covered by the scheme. Occupations outside the scope of automatic recognition would continue under standard systems, and other factors such as language requirements, migration rules or labour demand would still influence actual volumes. As a result, recognition and validation cases are expected to increase substantially above the baseline trajectory, with particularly strong effects in selected regulated professions and shortage sectors. In quantitative terms, the substantial positive effect of Policy Option 3 on the volume of recognition applications is expected to translate into an additional flow in the order of eight to thirteen thousand applications per year above the baseline of around 62,500. The figure reflects the structural shift introduced by the option for the seven sectoral professions covered by the automatic recognition framework (medical doctors, nurses, dentists, pharmacists, midwives, veterinary surgeons and architects), where the recognition pathway moves from a case-by-case assessment to a programme-based recognition supported by digital credentials, removing the principal procedural deterrent for qualifications obtained from verified third-country institutions. The empirical anchor of this estimate is twofold. First, the share of the seven sectoral professions

[808] Focus Group of 17 March 2026 with representatives of professional organisations.
[809] Focus Group of 19 March 2026 with TCNs.
[810] Focus Group of 14 April 2026 on quality assurance and automatic recognition.

Criteria	Rate	Summary of assessment
		in the current TCN flow is documented at 40 to 47 per cent on the basis of the EMN Ad-Hoc Query 2024.16 (medical doctor only: around 46,365 applications per year across 10 responding Member States) and of the dedicated TCN survey, where healthcare professions account for 46.8 per cent of the responses on the field of recognition. Second, the activation rate of the latent demand pool for sectoral professions under automatic recognition is expected to be substantial, in the order of 30 to 50 per cent, given the structural removal of the principal deterrent. The implementation discount is minimal, reflecting the mandatory and self-executing nature of automatic recognition; the residual uncertainty pertains to the pace of engagement of third-country institutions in the EU verification system and is interpreted as a high-uptake assumption for the upper part of the range. The detailed assumptions are reported in Annex 4.6. Overall, Policy Option 3 is therefore expected to have a significant positive quantitative impact (rate: +3) on the number of recognition and validation cases.
	+3	Overall assessment
Efficiency	+3	*Specific Objective 1:* Streamlining recognition and validation processes between and within Member States Under Policy Option 3, the common procedural measures introduced under Policy Option 2 are complemented by automatic or highly facilitated recognition pathways for selected professions, supported by trusted review mechanisms and stronger EU-level coordination arrangements. From an efficiency perspective, this option is expected to generate the strongest improvements in streamlining procedures. While Policy Option 2 reduces fragmentation through common rules, Policy Option 3 goes further by reducing the need for repeated national assessments for eligible qualifications and professions. As identified in Section 4, current systems often involve multiple authorities, repeated documentary checks and divergent national pathways. Policy Option 3 would significantly reduce these duplicative processes in sectors covered by the scheme. For CAs, upstream verification or trusted review bodies may substantially lower routine workloads and allow resources to focus on complex, higher-risk or exceptional cases. Instead of repeatedly analysing similar qualifications, authorities could rely on pre-validated programmes listed in the register, allowing them to process applications more quickly and consistently. The combination of automatic recognition and coordinated national systems would further reduce overlaps between recognition procedures and labour migration processes, enabling more streamlined end-to-end workflows. This expectation is supported also by the Survey with CAs, which asked how an EU action aiming to streamline the recognition of third-country qualifications held by TCNs would impact different cost components within organisations. In relation to these aspects, the results indicate expected efficiency gains. In particular, FTEs devolved to the recognition process are expected to decrease for 28.4% of respondents, with 8.4% indicating a substantial decrease and 20.0% a small decrease. Similarly, costs related to further investment in digitalisation are expected to decrease for 31.6% of respondents, with 12.1% reporting a substantial decrease and 19.5% a small decrease[811]. For TCNs, simplified pathways may reduce time spent navigating multiple institutions or resubmitting documentation. In addition, mandatory information requirements would ensure that applicants can easily identify the applicable recognition pathway, further reducing search costs and procedural errors. For employers, especially those recruiting across several Member States, more uniform systems may significantly improve planning and reduce uncertainty. Evidence across focus groups supports

[811] EU Survey to CAs. Q37: How would an EU action aiming to streamline the recognition of third country qualifications held by TCNs impact the following cost of your organization? (n=190).

Criteria	Rate	Summary of assessment
		this assessment. Authorities emphasised that access to pre-verified, structured information on qualifications and education systems could significantly reduce processing times[812]. Moreover, labour migration authorities and IOs, as well as ENIC-NARIC centres, PES and CSOs, highlighted fragmented governance, unclear pathways and burdensome multi-actor systems.[813] Other participants further stressed that existing recognition records should be reused more systematically and that central review mechanisms could reduce duplicated work across national authorities.[814] However, implementation would require robust governance arrangements and clear delineation of responsibilities between EU-level and national actors. Moreover, during focus groups competent authorities and professional organisations emphasised that establishing automatic recognition would require a substantial initial investment in system mapping, institutional assessment and monitoring of third-country education systems[815].This suggests that efficiency gains would likely be medium- to long-term rather than immediate. Overall, Policy Option 3 is therefore expected to have a significant positive impact (rate: +3) on efficiency regarding this objective.
	3	*Specific Objective 2: Reduce legal and administrative complexity for recognition and validation of qualifications and skills of third-country nationals* Under Policy Option 3, the simplification measures of Policy Option 2 are combined with automatic or highly facilitated recognition routes for selected professions. This substantially reduces the need for repeated case-by-case documentary assessment and lengthy procedural steps for eligible applicants. From an efficiency perspective, this option is expected to deliver the strongest reduction in administrative burden, compliance costs and waiting times. For covered professions, recognition would move from an individualised repetitive model towards pre-assessed or trusted pathways. For TCNs, this may significantly reduce costs linked to translations, certifications, repeated submissions and delayed labour market entry. As highlighted in the focus group with TCNs, delays in recognition often lead to skills underutilisation and long-term career shifts[816]; removing these delays could therefore generate major efficiency gains in labour market integration and human capital use. For employers, especially in shortage sectors, faster recognition may reduce vacancy costs and failed recruitment processes. For CAs, lower volumes of routine assessments may improve throughput and reduce backlogs. Authorities would be able to rely on pre-validated information and shared systems rather than conducting resource-intensive checks independently. This responds directly to their concerns that current verification processes are fragmented, duplicative and time-consuming. Evidence from focus groups strongly supports this conclusion. Employers highlighted the business costs of slow procedures.[817] Stakeholders also gave concrete examples of nurses being required to repeat full programmes for limited gaps and specialist doctors unable to practise

[812] Focus Group of 13 March 2026 with CAs and EU professional organisations in the healthcare sector. Open discussion on Q: "If comprehensive information on key-third country education and training systems were available, by how much could your assessment time for complex cases be reduced?".
[813] Focus Group of 02 March 2026 on labour migration with labour migration authorities and International Organisations; Focus Group of 04 March 2026 on information to TCNs with ENIC NARIC Centres, PES, and CSOs.
[814] Focus Group of 14 April 2026 on quality assurance and automatic recognition.
[815] Focus Group of 13 March 2026 with CAs and EU professional organisations in the healthcare sector. Open discussion on Q: "How feasible would automatic recognition (based on compliance with agreed common standards) be for some third-country qualifications in your sector?".
[816] Focus Group of 19 March 2026 with TCNs.
[817] Focus Group of 17 March 2026 with representatives of professional organisations.

Criteria	Rate	Summary of assessment
		despite qualifications, illustrating current inefficiencies.[818] In this regard, in terms of potential EU-level solutions, the Public Consultation explored stakeholders' views on the creation of a system whereby qualifications, training certificates, and evidence of skills could be issued as verifiable and transparent digital credentials, interoperable and recognisable across EU Member States. Overall, respondents show very strong support for this option, with overwhelming agreement that an EU-wide system of digital credentials would benefit TCNs and EU citizens with third-country qualifications. This reflects broad consensus that fragmented, paper-based and nationally specific procedures remain a key barrier to efficient recognition and validation. The consultation also highlights expected gains in efficiency and accessibility, including reduced administrative burden and costs for applicants, and more streamlined and reliable verification processes for employers and public authorities.[819] However, some complexity would remain in relation to language requirements, professional registration, ethics checks or cases outside the scope of the scheme. Overall, Policy Option 3 is therefore expected to have a significant positive impact (rate: +3) on efficiency regarding this objective.
	3	*Specific Objective 3: Increase trust and understanding of qualifications and skills obtained in third countries* Under Policy Option 3, the trust-building measures of Policy Option 2 are reinforced through trusted review bodies, structured quality-assurance assessments, possible lists of recognised institutions or programmes, and stronger systematic use of EU and international reference frameworks. From an efficiency perspective, this option is expected to generate the strongest gains in reducing duplicated verification work and improving access to trusted evidence. Instead of multiple national authorities separately researching the same institutions or programmes, common review systems could create reusable decisions and shared confidence. For CAs, this may substantially reduce time spent on authenticity checks and comparability analysis. For TCNs, stronger trust systems may reduce repeated requests for evidence and shorten processing times. For employers, clearer comparability signals may support faster recruitment decisions. Authorities, professional organisations, and key stakeholders such as ENIC NARIC, PES, and CSOs identified repeated verification and lack of shared trusted information as major sources of inefficiency.[820] By introducing a system where verification is performed once at EU level and reused across cases and Member States, Policy Option 3 directly addresses this structural inefficiency. The move towards digital credentials and centralised programme validation also responds to stakeholder calls for more reliable and scalable verification mechanisms. Participants further emphasised the usefulness of existing resources such as European Quality Assurance Register for Higher Education, DEQAR and the World Federation for Medical Education, as well as the value of trusted review mechanisms.[821] However, efficiency gains would depend on effective governance, adequate resourcing and timely updating of trusted information systems. Overall, Policy Option 3 is therefore expected to have a significant positive impact (rate: +3) on efficiency regarding this objective.

[818] Focus Group of 14 April 2026 on quality assurance and automatic recognition.
[819] PC Results. Q 67: Do you think that such a system would lead to cost savings or reductions in administrative burden for any of the groups below? (n=118); in European Commission (2026). *Study Supporting an Impact Assessment of EU rules for the recognition of qualifications and validation of skills of third country nationals. Public Consultation Analysis*.
[820] Focus Group of 02 March 2026 on labour migration with labour migration authorities and International Organisations; Focus Group of 04 March 2026 on information to TCNs with ENIC NARIC Centres, PES, and CSOs.
[821] Focus Group of 14 April 2026 on quality assurance and automatic recognition.

Criteria	Rate	Summary of assessment
	-	*Quantitative impact concerning costs* Under Policy Option 3, the common procedural measures introduced under Policy Option 2 are complemented by automatic or highly facilitated recognition pathways for selected professions, supported by trusted review mechanisms, stronger comparability tools and shared governance arrangements. As highlighted in Section 4, the current system can generate substantial direct and indirect costs for TCNs, employers and CAs. These include application fees, translation and certification expenses, repeated submissions, long waiting periods, delayed labour market entry, vacancy costs for employers and resource-intensive case-by-case assessments. Policy Option 3 is expected to reduce these recurring costs significantly over_time, but it would also require higher initial implementation effort than the previous options. For TCNs, automatic or highly facilitated pathways for eligible professions may substantially reduce compliance costs linked to repeated documentation, multiple applications, translations and long delays before entering regulated occupations. Earlier access to employment matching qualifications may also reduce opportunity costs associated with inactivity or underemployment. These challenges are widely reflected in the Public Consultation results. Several individuals holding qualifications obtained outside the EU reported that documentation requirements constituted a significant financial barrier even before they could begin their professional pathway, disproportionately affecting those with extensive careers or education completed outside EU systems. Respondents also associated lengthy procedures with periods of enforced inactivity, delayed career progression and prolonged reliance on precarious employment. In some cases, they highlighted that the same burdensome process would have to be repeated when applying in another Member State.[822] For employers, especially in shortage sectors such as healthcare, engineering or other regulated professions, faster and more predictable recognition may reduce vacancy costs, repeated recruitment cycles and the loss of candidates during lengthy procedures. For CAs, the reduction of routine case-by-case assessments for covered professions may lower administrative costs over time and allow resources to be redirected towards complex files, enforcement or quality control. Evidence across focus groups supports these expected gains. Employers highlighted the business costs created by slow recognition procedures.[823] TCNs referred to costs, delays and repeated burdens.[824] Participants also provided concrete examples of inefficiency, including qualified professionals being required to repeat extensive training despite limited gaps and authorities duplicating assessments already carried out elsewhere.[825] However, Policy Option 3 would also entail the highest transition and set-up costs among the options. Member States and EU-level actors may need to establish trusted review mechanisms, develop governance structures, create or expand databases, ensure interoperability, train staff and monitor quality assurance systems. These upfront investments could be significant, especially in the initial implementation phase. For this reason, although recurring administrative and user costs are expected to fall substantially over time, net short- to medium-term cost impacts are likely to be more moderate than the effectiveness gains.

[822] PC Results. Q27: Please elaborate on any personal experiences with any of these challenges. (n=98); in European Commission (2026). *Study Supporting an Impact Assessment of EU rules for the recognition of qualifications and validation of skills of third country nationals. Public Consultation Analysis*.
[823] Focus Group of 17 March 2026 with representatives of professional organisations.
[824] Focus Group of 19 March 2026 with TCNs.
[825] Focus Group of 14 April 2026 on quality assurance and automatic recognition.

Criteria	Rate	Summary of assessment
		Overall, Policy Option 3 is therefore expected to have a moderate positive quantitative impact (rate: +2) on costs associated with recognition and validation procedures, reflecting higher implementation costs offset by stronger long-term efficiency savings.
	3	Overall assessment
Coherence	3	*Specific Objective 1: Streamlining recognition and validation processes between and within Member States* Under Policy Option 3, the common procedural measures introduced under Policy Option 2 are complemented by automatic or highly facilitated recognition pathways for selected professions, supported by trusted review mechanisms and stronger EU-level coordination arrangements. From an internal coherence perspective, this option is strongly aligned with the objective of streamlining processes because it addresses fragmentation at both procedural and structural levels. While Policy Option 2 improves coordination through common rules, Policy Option 3 further reduces the need for repeated national assessments and multiple parallel pathways for eligible professions. As identified in Section 4, current systems often operate separately across Member States, creating inconsistent pathways and inefficiencies. This is further confirmed by the Public Consultation, where stakeholders consistently describe recognition procedures for TCNs as fragmented, complex and duplicative. In the absence of a uniform EU pathway, this fragmentation emerges as a major obstacle to the effective recognition of third-country qualifications. In particular, several TCNs and EU citizens with third-country qualifications provide examples of how such fragmentation translates into fragmented recognition pathways, often involving multiple steps and different administrative routes across jurisdictions. Respondent evidence overall indicates that procedural complexity affects applicants through several reinforcing channels, including delays and lack of transparency in decision-making processes, as well as burdensome and inconsistent documentary requirements leading to divergent treatment of equivalent qualifications across Member States. Taken together, these dynamics generate costs not only for TCNs, but also for employers and host economies, by increasing uncertainty, extending processing times and reducing the overall efficiency of recognition systems.[826] Policy Option 3 would provide the most coherent EU-wide architecture for professions within scope. From an external coherence perspective, the option is highly consistent with wider EU objectives relating to labour shortages, competitiveness, talent attraction and more effective use of migrant skills. It strongly complements the European Commission, Talent Partnerships and broader labour mobility strategies by ensuring that recruitment pathways are matched by workable recognition systems. For TCNs, stronger coherence between migration and recognition systems may significantly improve usability of legal pathways. For employers, particularly those recruiting across borders, more uniform recognition outcomes may reduce uncertainty. For CAs, common governance arrangements may support stronger policy consistency. Evidence from focus groups, in particular coming from labour migration authorities, IOs, and key stakeholders in the recognition system, confirmed that fragmentation across Member States reduces the effectiveness of broader migration and labour market policies.[827]

[826] PC Results. Q26: Have you had any personal experiences with any of these challenges, for example, when applying for jobs in a different country, recruiting people from another country or dealing with the recognition of qualifications or validation of skills? (n=98); in European Commission (2026). *Study Supporting an Impact Assessment of EU rules for the recognition of qualifications and validation of skills of third country nationals. Public Consultation Analysis*.

[827] Focus Group of 02 March 2026 on labour migration with labour migration authorities and International Organisations; Focus Group of 14 April 2026 on quality assurance and automatic recognition.

Criteria	Rate	Summary of assessment
		However, coherence gains would be strongest in professions covered by the scheme, while sectors outside scope would remain under more diverse national systems. Moreover, stakeholders also emphasised during focus group that automatic recognition would require well-developed "communities of practice" across jurisdictions and sectors, supported by sufficient funding and coordination capacity. These communities would be essential to ensure that recognition systems remain operationally coherent and grounded in shared professional understanding across Member States and third countries.[828] Overall, Policy Option 3 is therefore expected to have a significant positive impact (rate: +3) on coherence regarding this objective.
	3	*Specific Objective 2: Reduce legal and administrative complexity for recognition and validation of qualifications and skills of third-country nationals* Under Policy Option 3, the simplification measures of Policy Option 2 are combined with automatic or highly facilitated recognition routes for selected professions. From an internal coherence perspective, this option is strongly aligned with the objective of reducing complexity because it not only simplifies procedures but, for covered professions, partially replaces complex recognition pathways with more direct access routes. The introduction of automatic recognition also reduces inconsistencies in how complexity is experienced across Member States. Under policy option 2, applicants may still face variations in how simplification measures are applied in practice. Under policy option 3, however, the recognition pathway for eligible qualifications becomes structurally simplified and uniform, limiting the scope for divergent administrative practices. This contributes to a more coherent overall system, particularly in professions where procedural burdens have traditionally been high. From an external coherence perspective, the option is highly coherent with EU priorities on competitiveness, labour shortages and faster labour market integration of legally residing TCNs. It also aligns with broader simplification and digitalisation agendas. Moreover, policy option 3 responds directly to stakeholder concerns that complex recognition procedures undermine the effectiveness of broader labour migration and integration policies. For TCNs, recognition systems would become more consistent with integration and employment objectives. For employers, recruitment needs would be better aligned with administrative procedures. For CAs, the reduction of routine assessments would support more focused use of resources. Evidence from focus groups repeatedly showed that current complexity undermines labour market objectives and discourages both applicants and employers.[829] However, some complexity linked to language, licensing and profession-specific safeguards would remain. Overall, Policy Option 3 is therefore expected to have a significant positive impact (rate: +3) on coherence regarding this objective.
	3	*Specific Objective 3: Increase trust and understanding of qualifications and skills obtained in third countries* Under Policy Option 3, trust-building tools are reinforced through trusted review bodies, structured quality-assurance assessments, possible lists of recognised institutions or programmes, and systematic use of existing EU and international quality-assurance frameworks.

[828] Focus Group of 04 March 2026 on information to TCNs with ENIC NARIC Centres, PES, and CSOs.
[829] Focus Group of 17 March 2026 with representatives of professional organisations; Focus Group of 19 March 2026 with TCNs; Focus Group of 14 April 2026 on quality assurance and automatic recognition.

Criteria	Rate	Summary of assessment
		From an internal coherence perspective, this option is strongly aligned with the objective of increasing trust and understanding because it converts information tools into an operational recognition architecture based on reusable trust decisions and shared evidence. From an external coherence perspective, the option is highly coherent with wider EU transparency and portability tools, including the European Qualifications Framework, and with international quality assurance cooperation. It also reflects the EU objective of building more strategic talent partnerships with third countries. For CAs, stronger common trust systems may significantly improve consistency of decisions. For employers, clearer and more credible comparability signals may support hiring decisions. For TCNs, stronger predictability may improve confidence in recognition pathways. Labour migration authorities, IOs, and ENIC NARIC centres, PES, and CSOs highlighted authenticity and comparability challenges.[830] Stakeholders also reinforced the value of building on existing resources such as European Quality Assurance Register for Higher Education, DEQAR, ESG-aligned systems and the World Federation for Medical Education rather than creating parallel systems.[831] In this respect, respondents to the Public Consultation similarly emphasised the need to simplify, better integrate and upgrade existing EU tools. In particular, they frequently called for a single, unified EU access point for skills and qualifications, with Europass often identified as a natural anchor, provided its usability is improved. Digitalisation and interoperability emerged as key priorities, with strong support for verifiable, machine-readable credentials that can be shared across borders and integrated with the EU Digital Identity Wallet. Respondents also highlighted the importance of strengthening links between existing instruments (such as ESCO, EQF and national databases) to enable more transparent, skills-based assessment of qualifications. Finally, several contributions pointed to the need for clearer trust signals for employers and more accessible guidance on the legal effects of recognition decisions.[832] However, robust governance and periodic review would remain necessary to preserve trust over time. Overall, Policy Option 3 is therefore expected to have a significant positive impact (rate: +3) on coherence regarding this objective.
	3	Overall assessment
Proportionality	-	*Specific Objective 1: Streamlining recognition and validation processes between and within Member States* Under Policy Option 3, the common procedural measures introduced under Policy Option 2 are complemented by automatic or highly facilitated recognition pathways for selected professions, supported by trusted review mechanisms and stronger EU-level coordination arrangements. From a proportionality perspective, this option represents a more ambitious intervention than Policy Option 1 and Policy Option 2, as it goes beyond procedural coordination and creates more substantive common recognition effects for selected professions, while leaving the final recognition decision still with Member States. However, the intervention remains targeted and calibrated, rather than horizontal or unlimited in scope. As identified in Section 4, fragmentation and lengthy procedures generate significant inefficiencies, particularly in sectors facing persistent

[830] Focus Group of 02 March 2026 on labour migration with labour migration authorities and International Organisations; Focus Group of 04 March 2026 on information to TCNs with ENIC NARIC Centres, PES, and CSOs.
[831] Focus Group of 14 April 2026 on quality assurance and automatic recognition.
[832] PC Results. Q60: Would you suggest changes to any of the above tools to enhance the portability of skills and qualifications in the single market? If so, please elaborate (n=486); in European Commission (2026). *Study Supporting an Impact Assessment of EU rules for the recognition of qualifications and validation of skills of third country nationals. Public Consultation Analysis*.

Criteria	Rate	Summary of assessment
		labour shortages. In that context, stronger action may be justified where lighter measures would be insufficient to address structural barriers. Importantly, automatic recognition would apply only to selected professions or qualifications meeting clearly defined conditions which have already been agreed upon by Member States in the context of the Professional Qualifications Directive. This mirrors the approach already used within the existing EU framework for EU nationals, where automatic recognition under the European Union is limited to specific professions linked to common minimum training requirements. Policy Option 3 would therefore build on an established targeted regulatory logic and existing standards for a pre-defined selection of professions rather than introducing an entirely new or unrestricted model. For CAs, the option could significantly reduce routine case handling over time. For TCNs and employers, the benefits in terms of faster and more predictable recognition may be substantial. During focus groups, participants showed support for stronger EU solutions where labour shortages are acute, while also stressing the importance of careful scoping, phased implementation and safeguards for quality and public trust.[833] Overall, Policy Option 3 is therefore expected to have a moderate positive impact (rate: +2) on proportionality regarding this objective.
	-	*Specific Objective 2: Reduce legal and administrative complexity for recognition and validation of qualifications and skills of third-country nationals* Under Policy Option 3, the simplification measures of Policy Option 2 are combined with automatic or highly facilitated recognition routes for selected professions, substantially reducing procedural burdens for eligible applicants and case-handling costs for recognition authorities. From a proportionality perspective, this is particularly relevant as it leads to significant cost and workload reductions for recognition authorities in the handling of those cases covered by automatic or highly facilitated pathways, even if their scope remains limited to selected professions. A comparable reduction in administrative burden also applies to applicants, who benefit from faster, less documentation burden and more predictable recognition processes. From a proportionality perspective, the objective pursued is legitimate and strongly supported by the barriers identified in Section 4, including excessive delays, repeated documentation requests and high user costs. While the option relies on a stronger regulatory response than previous options, the intervention remains limited to areas where common trust conditions or robust comparability mechanisms can justify simplified treatment. The option is proportionate because it does not eliminate all safeguards. Language requirements, professional registration rules, ethical obligations or public-safety checks could still be maintained where justified. Automatic recognition could moreover only be extended to professions for which Member States have agreed upon harmonised minimum training requirements in the context of the PQD. As with the existing EU system for EU nationals, a profession-specific approach focused on areas where training comparability is strongest helps ensure that the intervention does not go beyond what is necessary.

[833] Focus Group of 13 March 2026 with CAs and EU professional organisations in the healthcare sector; Focus Group of 14 April 2026 on quality assurance and automatic recognition.

Criteria	Rate	Summary of assessment
		For TCNs, the benefits would likely be substantial through lower burdens and faster labour market access. For employers, recruitment bottlenecks could be significantly reduced. For CAs, administrative burdens may fall over time, despite transitional implementation effort by adapting internal procedures and workflows. During focus groups, both representatives of professional organisations and TCNs strongly highlighted the burden of current procedures[834]. In addition, Member States consistently reported additional requirements for TCNs, including mandatory compensation measures such as exams, supervised practice or adaptation periods, detailed academic nostrification procedures involving curriculum comparisons, and stricter or earlier language requirements[835]. These elements are often combined in multi-stage pathways that significantly lengthen and complicate access, especially in highly regulated fields. Such complexities would be significantly reduced under this Policy Option. Key stakeholders in the recognition system also stressed that automatic recognition should be carefully designed and linked to robust comparability conditions.[836] Overall, Policy Option 3 is therefore expected to have a moderate positive impact (rate: +2) on proportionality regarding this objective.
	-	*Specific Objective 3: Increase trust and understanding of qualifications and skills obtained in third countries* Under Policy Option 3, trust-building tools are reinforced through trusted review bodies, structured quality-assurance assessments, recognised institution or programme lists, and systematic use of EU and international quality-assurance frameworks. From a proportionality perspective, these measures directly respond to the trust deficits and information gaps identified in Section 4. They imply a more developed EU-level architecture than previous options but remain proportionate insofar as they are designed to support targeted automatic recognition pathways and to reduce duplicated national verification efforts. This is further supported by the fact that a framework of minimum training requirements is already fully developed under the PQD, providing an established and solid baseline. In addition, the design of the system ensures that assessment activities are fully financed by the applying institutions themselves, thereby avoiding additional financial burdens on public authorities and contributing to cost-efficient implementation. The option is also proportionate because it can build on existing trusted resources rather than requiring entirely new systems. Existing quality-

[834] Focus Group of 17 March 2026 with representatives of professional organisations; Focus Group of 19 March 2026 with TCNs.

[835] EMN, 2024. Ad-Hoc Query 2024.16 on Recognition of third-country qualifications for the profession of doctor with basic medical training. Survey targeted at CAs, Q5.a: "If not, how do the procedures for recognition of TCQs held by third-country nationals differ from those applied to EU/EEA applicants with EU/EEA qualifications?" (n=96)

[836] Focus Group of 14 April 2026 on quality assurance and automatic recognition.

Criteria	Rate	Summary of assessment
		assurance structures, databases and sectoral accreditation frameworks can be used where appropriate, limiting unnecessary duplication. For CAs, participation in stronger common systems may create obligations, but these are linked to clear operational needs. For employers and TCNs, clearer trust signals may improve outcomes without major direct burdens. Stakeholders strongly supported using existing resources such as European Quality Assurance Register for Higher Education, DEQAR and the World Federation for Medical Education, reinforcing the proportionality of a targeted support model rather than a wholly new architecture.[837] Overall, Policy Option 3 is therefore expected to have a moderate positive impact on proportionality regarding this objective.

[837] Ibid.

Annex 17. Focus Groups Minutes

Annex 17.1 Online Focus Group 1 (FG1) on access to regulated professions with Competent Authorities (CAs) of crane operators and electricians

Annex 17.1.1 Agenda of the meeting

Time	Agenda item
09:30 – 09:40	**Welcome** Opening remarks by DG EMPL Presentation of the objectives of the focus groups and housekeeping rules
09:40 – 10:00	**Introductory session** Presentation of the study Recap of problem definition Presentation of policy objectives and identified POs
10:00 – 10:15	**Q&A**
10.15 – 10.30	**Coffee-break**
10:30 – 11.45	**Focused discussion (break out room)** Interactive discussion with polls questions on the impacts of the identified policy options
11:45 – 11:30	**Wrap-up and next steps** Summary of key takeaways by facilitator Explanation of how the inputs will feed into the study Closing remarks and thanks

Annex 17.1.2 Opening remarks

The **Deputy Head of Unit B.5 in DG EMPL** opened the meeting by outlining the Skills Portability Initiative, particularly Action 3, as a key priority of the current Commission mandate, situated within the broader framework of the Union of Skills, which aims to ensure that TCNs can fully use their skills and competences when entering the EU Single Market.

Annex 17.1.3 Presentation by the study Team

The **Contractor** presented the problem tree in all its constituting elements: core problem, its consequences, but most importantly the drivers of the problem and their underlying issues.

The **Contractor** also briefly presented the objective tree, linking the core problem and the three identified drivers to one general and three specific policy objectives. The contractor clarified that the identified drivers and the resulting policy objectives will guide the development of relevant policy measures.

Annex 17.1.4 Q&A

- **The NL CA** highlighted that Crane driving is highly safety-critical; in NL, TCNs are not allowed to work as crane operators without taking the exam in the NL, as maintaining a high level of safety is the overriding priority. Indeed, for crane drivers from third countries, access is not based on education but on passing a national exam aligned with the same safety regulations for everyone. EU citizens may be exempt from the exam, while TCNs must pass it, as no direct comparison of qualifications is applied.
- **The CA from MT** explained that in the electrical sector, safety risks (fire, electrocution) are central, especially where installation is linked to system design. MT (and other countries like for instance CY) follow UK standards; TCNs often work initially as assistants under supervision. Licences from Commonwealth countries are sometimes accepted due to system equivalence, but verification (e.g. issuer checks, syllabus review, interviews) is essential. Overall, a one-size-fits-all system is not feasible, and ad-hoc assessments remain necessary for TCNs.
- **DG EMPL** clarified that regulation in these professions is driven by health and safety considerations and remains a Member State competence. While recognition mechanisms exist for EU citizens, there is currently no equivalent pathway for automatic recognition of TCN qualifications; compliance with national safety standards is key.
- **The CA from LT** explained that in the energy and water sectors, professions are regulated and overseen by a competent authority in LT. Requirements vary by role (university degree, licence, experience), but all professionals must demonstrate relevant education, training hours, and experience, and undergo approval or adaptation procedures. Employers may accept certain TCN qualifications, but only within the framework set by national authorities.

Annex 17.1.5 Interactive session

Following the initial plenary session, the meeting continued with an interactive part aimed at gathering participants' perspectives in a more structured way. For each policy option, participants were first invited to respond to a short poll question designed to capture their initial reactions. The results of the poll were then discussed with the group, giving the opportunity to reflect collectively on the emerging responses and to share experiences and views regarding the potential impacts of the policy option under consideration. Comments were also collected via the chat.

Question 1: To what extent do differences across Member States in recognising TCN qualifications create difficulty for your authority?

Polls:

Option	Percentage
Not at all	32%
To a limited extent	42%
To a moderate extent	21%
To a large extent	5%

Respondents: 19

Open discussion:

The CA from MT voted "to a moderate extent". Differences in how Member States recognise TCN qualifications may create challenges when a qualification obtained in one country is expected to be accepted in another. If recognition parameters are more relaxed in certain Member States, individuals may obtain recognition there and subsequently seek to move elsewhere within the EU, even when training and qualification requirements differ. The absence of a more standardised expected level of qualifications across the EU could therefore create inconsistencies and potential difficulties for authorities.

Question 2: How feasible would automatic recognition (based on compliance with agreed common standards) be for some third-country qualifications in your sector?

Polls:

Option	Percentage
Not feasible	39%
Feasible only for a limited number of trusted training system	17%
Feasible with additional safeguards (test or adaptation periods)	44%
Broadly feasible	0%

Respondents: 18

Open discussion:

- **The CA from MT** considered automatic recognition "not feasible". In the Maltese context, the methodologies used for designing and installing electrical installations are not standardised across the EU. As a result, individuals seeking to carry out this work in Malta must first be assessed to verify that the basic qualification requirements are met. While tests or adaptation periods may sometimes be used, an initial assessment of qualifications remains necessary, making automatic recognition impractical. Highlighted that a large majority of respondents to the poll did not support automatic recognition without additional verification.
- **The CA from NL** stressed that consistent system for comparing qualifications has not yet been fully achieved within the EU itself, and addressing this should be the first step. Only after establishing reliable comparability within the EU, it would be appropriate to extend similar mechanisms to qualifications obtained outside the EU.
- **The CA from EE** supported the points raised by previous speakers. n Estonia, automatic recognition currently applies only to architects. For other professions, such as crane operators, applicants must submit an application, and their qualifications are not automatically recognised. Establishing an EU-wide system for automatic recognition within the Union could make it easier in the future to deal with qualifications obtained in third countries. At present, however, recognition remains challenging even within the EU.
- **The CA from IT** voted the option "feasible with additional safeguards". They mostly provide for titles coming from secondary school or professional qualifications, but national regulation also includes a period of experience or introduction. Regarding the professional installation systems, such as electricians and plumbers, it was explained that in the case of third-country qualifications, a comparison is usually made between their competencies and national requirements. This comparison evaluates whether a secondary school diploma was achieved and if there was previous experience. Based on this, a decision is then made on the possibility of requiring a test or an adaptation

period. Therefore, the proposal is considered feasible, provided that these further requirements and competency comparisons are maintained.

Question 3: To what extent do documentation requirements slow down recognition procedures?

Polls:

Option	Percentage
Not at all	11%
To a limited extent	26%
To a moderate extent	37%
To a large extent	26%

Respondents: 19

Open discussion:

- **The CA from EE** said that the main difficulty is not the documentation itself but applicants' understanding of the requirements. Delays often occur because applicants do not clearly understand which documents need to be submitted or how they should be provided. As a result, documents are sometimes missing or submitted incorrectly, which slows down the procedure.
- **The CA from SE** highlighted that similar challenges are observed in the Swedish Electrical Safety Board. The issue is not the documents themselves but the regulatory framework, which requires applicants to demonstrate both education and practical experience. Applicants may present education obtained anywhere in the world, as there are no restrictions on the type or origin of the education. However, they must demonstrate specific skills required for the profession. The main challenge is determining whether those skills are present. This often requires requesting specific documents and sometimes seeking support from other authorities to investigate whether the skills match the national requirements. The process involves evaluating a wide range of educational backgrounds and verifying the qualifications needed to obtain certification as an electrical contractor. Insurance requirements also need to be verified. Because educational pathways can vary considerably, assessing and investigating these documents can take time and is not always straightforward.
- **The CA from LT** voted "to a limited extent." Lithuania recently established an electronic system for the certification of energy workers, involving 12 institutions responsible for certification. According to statistics from the previous year, around 10,000 energy workers were certified through this system. That means that they were able to test their own knowledge. Certification involves two stages. The first stage is the assessment of education, which can sometimes create time-related issues because certain positions require university-level education. The content of programmes may differ across universities, even when the profession has the same title. Higher requirements apply to those responsible for managing specific energy installations or taking on managerial responsibilities. The second stage involves verifying a required period of professional experience. Statistics show that around 7,000 candidates passed the examinations. This means that those applying for lower-level positions or functions generally need only vocational or secondary education. Certification must also be renewed every five years through re-examination. While no major difficulties have been observed overall, high requirements - particularly the requirement for a university degree for some roles - may

contribute to shortages in certain positions. Some companies have also questioned whether these requirements are proportionate. Further work is therefore being undertaken to review the system and the content of educational programmes. The need to consult the competent regulatory authority to obtain detailed information on third-country applicants was highlighted.

- **The CA from MT** highlighted that applications are generally submitted online. To verify the authenticity of certificates, the authority contacts the issuing institution, such as the school that issued the certificate, and requests confirmation that the documentation is genuine. In some cases, no response is received from the institution, which delays the whole evaluation procedure. When this occurs, the authority contacts the applicant and asks them to reach out to their former school and request that it respond to the authority's enquiry through an official email channel. This additional step may prolong the evaluation process.
- **The CA from IT** voted "to a moderate extent". When assessing qualifications obtained in third countries, authorities often need to verify the authenticity of diplomas or professional qualifications. Applicants are therefore asked to provide a declaration of value, a document issued by the relevant embassy (for example, the Italian embassy) confirming whether the professional activity is regulated in the country of origin and whether the applicant is entitled to practise that profession there. Obtaining this document may take time, and the information provided is sometimes incomplete or limited to the qualification title. In such cases, additional checks may be necessary with the authorities in the country of origin, local embassies, or the institutions that issued the diplomas or certifications. As noted by Peter, responses from these institutions are not always received or may contain incomplete information, which can further slowdown the recognition process.

Question 4: Which measures would most reduce the time needed to assess applications?

Polls:

Option	Percentage
Verified digital credentials	6%
Better information on education and training systems	72%
Standardised assessment templates	6%
Shared recognition precedent	17%

Respondents: 18

Open discussion:

- **The CA from IT** indicated that, if multiple options had been possible, he would have selected both "better information on education and training systems" and "shared recognition precedent." He ultimately chose the second option. Improved information on education and training systems would help authorities better understand the applicant's background, including what the applicant has achieved and the value of those achievements in the country where the qualification was obtained. In his view, both improved information and shared recognition precedents would be particularly useful when assessing applications from third-country nationals.
- **The CA from EE** also selected "better information on education and training systems." While she is familiar with the requirements and certification processes in Estonia, it is

more difficult to understand the requirements in other EU countries. Having clearer information on aspects such as the duration of studies or the requirements needed to obtain a diploma or certificate in another country would be helpful. At present, this information often needs to be requested directly from the relevant authority in the country concerned.

- **The CA from LT** selected "standardised assessment templates." The option of better information on education systems appeared unclear, particularly given earlier points regarding the variability of educational content across institutions. It is difficult to determine what kind of information countries could realistically share about the content of education programmes and how comparable such information would be. Moreover, in Lithuania companies have certification commissions that are authorised to evaluate the qualifications of individual workers. In this context, it is unclear who would determine whether the content of education across different countries is equivalent, especially since assessments may depend on the judgement of the institution responsible for certification. For this reason, standardised assessment templates can be considered a more practical instrument. Such templates could provide a structured framework including elements such as the level of education and a certain number of hours of professional experience. This could support the first stage of assessing the education level, while a second safeguard would remain in place through the verification of practical experience and certified qualification courses. The final decision would in any case remain with the certification commission at company level, which would decide whether to accept the worker.

Question 5: Would common EU-level tools reduce the time and effort needed for your qualification assessments? (examples: shared databases of third-country training programmes, standardised assessment templates, pooled recognition precedents, digital credential verification systems linked to third-country authorities)

Polls:

Option	Percentage
No reduction	0%
Slight reduction (up to 10%)	11%
Moderate reduction (10-25%)	21%
Significant reduction (more than 25%)	68%

Respondents: 19

Open discussion:

- **The CA from NL** highlighted that preference for simple EU-level tools, avoiding the creation of systems similar to the IMI system used for the regulation of professions. The IMI system can be difficult to use and is poorly designed from a user perspective, with insufficient testing involving actual users. In practice, direct exchange of documents by email between countries allows authorities to carry out the comparison more easily. The IMI system is considered not workable and overly complex, with similar concerns also reported at national level in the Netherlands.
- **The CA from MT** explained that clarification requested regarding digital credential verification systems linked to third-country authorities, in particular whether certificates issued in third countries could be verified through a trusted digital system confirming their

authenticity. Such a tool could help address limited trust and understanding of qualifications obtained in third countries, through credentials that are digitally verifiable online. However, implementation raises practical challenges. Certificates refer to specific individuals, implying the existence of databases containing qualifications issued by universities and schools in third countries. For example, applications frequently originate from India, which would require a database including all candidates holding relevant qualifications. Establishing such databases at global level appears complex, particularly given that comparable comprehensive systems do not currently exist within the EU. Existing initiatives on digital credentials for EU citizens and workers may nonetheless provide possible inspiration.

Question 6: How often do you lack sufficient information to determine whether a third-country qualification includes the practical competences required for regulated professions in your sector?

Polls:

Option	Percentage
Rarely (less than 10% of cases)	6%
Occasionally (10–25%)	17%
Frequently (25–50%)	50%
Very frequently (more than 50%)	28%

Respondents: 18

Open discussion:

- **The CA from MT** signalled the frequent lack of information on the content of the studies leading to the qualification.

Question 7: Would structured EU-level information on third-country education and training systems materially improve your assessment capacity? (examples: comparative studies, quality assurance mapping, cooperation agreements)

Polls:

Option	Percentage
No improvement	0%
Slight improvement	18%
Moderate improvement	59%
Significant improvement	24%

Respondents: 17

Open discussion:

- **The CA from EE** explained that the availability of a database or online platform containing information on third-country education and training systems would make it easier to search and access the necessary information.
- **The CA from MT** mentioned that there is frequent lack of information on what has actually been studied to obtain a qualification. The availability of structured information

comparable to national syllabus requirements, such as those used in Malta for the training required to become an electrician, would facilitate comparison. Access to this type of information would make it easier to understand the studies completed for a given qualification, identify gaps in training, and guide candidates towards additional studies on specific topics needed to meet national requirements. Publication by each country of national training requirements for specific professions and skills would allow comparison of qualifications and help determine what is missing or what needs to be added for a candidate to be authorised to carry out the work in the host country.

Question 8: To what extent is EU-level action needed to reduce fragmentation in TCN qualification recognition in your professional sector, compared to what Member States could achieve through bilateral cooperation alone?

Polls:

Option	Percentage
To a large extent — EU action would enable Member States to effectively address challenges faced	19%
To a moderate extent — EU action would accelerate convergence already underway	50%
To a small extent — bilateral cooperation would be largely sufficient	31%
Not at all — Member States are already converging adequately	0%

Respondents: 17

Question 9: If the current system for recognition of qualifications of TCNs remains unchanged, with no EU action, how would the situation evolve over the next 5 years for regulated professions in your sector?

Polls:

Option	Percentage
It would improve through national reforms	6%
It would remain broadly stable	88%
It would worsen slightly (growing fragmentation, increasing TCN volumes)	6%
It would worsen significantly	0%

Respondents: 16

Open discussion:

- **The CA from MT** explained that current procedure allows assessment and qualification of around 25 TCNs per year and is considered working effectively. Attempting to create a single EU-wide system for recognition of qualifications would likely complicate matters. Each country knows the requirements for allowing TCNsto practise a profession, and targeted tools, such as measures to reduce documentation delays, could improve efficiency. A standardised EU system risks making the process more difficult and less manageable.

- **The CA from LT** stressed that National-level systems in Lithuania are effective and functioning quite well, so the situation is expected to remain broadly stable over the next five years. However, five years is a short period in the energy sector, especially for the development of new or novel technologies such as hydrogen or carbon capture and utilisation, which require qualifications not currently in place. These projects involve long development processes, so significant gaps in professional capacity are expected only over longer periods. In these cases, standardised EU-level tools could provide support, but responsibilities and the burden of evaluation should remain with national certification institutions, which already have experience and established practices. Certification processes result in a certificate subject to administrative procedures and potential discussion over whether qualifications are evaluated appropriately, and standardised tools for evaluation and assessment could assist these processes while leaving final responsibility with the national institutions.
- **The CA from LT** mentioned that technical knowledge requirements differ across countries due to variations in infrastructure (e.g., isolated or grounded distribution grids, compensated systems). Recognition processes should identify gaps in knowledge for licensing participants, allowing workers to acquire the necessary skills and validate their competences. This underlines the importance of national context-specific requirements in the assessment process.

Annex 17.1.6 Closing remarks

The **Contractor** thanked participants for their attendance and provided an overview of the ongoing activities in the context of the Study under Action 3. In particular, the **Contractor** informed participants about the ongoing survey targeting competent authorities and issued a final reminder following the extension of the deadline to **19 March**. In addition, the **Contractor** invited participants to complete a follow-up data collection form on costs by **16 March**, which was circulated by email after the meeting. This data form aims to collect information on the types of costs incurred by authorities during qualification checks in the context of recognition of qualifications and validation of skills of TCNs.

Annex 17.2 Online Focus Group 2 (FG2) on the healthcare sector with Competent Authorities and EU professional organisations in the healthcare sector

Summary of the discussion

Annex 17.2.1 Agenda of the meeting

The following items were discussed as part of the meeting agenda:

Table 1 - Agenda of FG4

Time	Agenda item
09:30 – 09:40	**Welcome** Opening remarks by DG EMPL Presentation of the objectives of the focus groups and housekeeping rules
09:40 – 10:00	**Introductory session** Presentation of the study Recap of problem definition Presentation of policy objectives and identified POs
10:00 – 10:15	**Q&A**
10.15 – 10.30	**Coffee-break**
10:30 – 11.45	**Focused discussion (break out room)** Interactive discussion with polls questions on the impacts of the identified policy options
11:45 – 11:30	**Wrap-up and next steps** Summary of key takeaways by facilitator Explanation of how the inputs will feed into the study Closing remarks and thanks

Annex 17.2.2 Opening remarks

DG EMPL opened the discussion introducing the importance of the Skills Portability Initiative (SPI) and in particular for Action 3 on recognition of qualifications and validation of skills of TCNs and the need to analyse the extent to which it is possible to establish harmonised rules for recognition and validation of TCNs, particularly in the healthcare sector.

Annex 17.2.3 Q&A

The Contractor opened the floor for discussion and questions regarding Problem definition and POs.

- **The CA from IE** mentioned that PO 1 would be the most appropriate to balance the responsibility for protection of the public while supporting professional movement. Aware of the impact of TCNs in IE, but also there is a need to balance this need with protection and safety, education levels and qualifications. Expanding Automatic recognition would be difficult, as well as PO2, while PO1 would allow to expand existing mechanisms while maintaining the safety standards and educational standards high. Existing mechanism could entail enhancing coordination mechanisms across MS , IMI and existing mechanism, so it might be useful to look the extent to which the directive is

implemented in a similar manner across EU MS and with the right and similar standards, so ensure that standards are the right ones and are implemented in a coordinated manner.

- **One professional organisation** said that it is key to strengthen existing mechanisms and MTS. It is also important to ensure that candidates follow similar procedures across MS, otherwise this represents a challenge. So similar procedural rules would be beneficial. Irish have expertise and knowledge in the type of diplomas and curricula and different standards. Under PO1 it would be important to pool knowledge of EU MS (e.g. centralized database) and ensure that the process is streamlined across EU MS and enhance the ability to access to information for CAs across EU MS.
- **One professional organisation** welcomed the initiative and recognition of TCNs qualifications. On PO2, need to be aware about differences across MS (e.g. language requirements). In SE language takes long to fulfil requirement to become healthcare assistant and need to count on that when considering simplification. HOSPEEM welcomes the implementation of digital tools, but they should remain available for everyone. They welcome the initiative like EU Talent Pool and the possibility to expand this platform to other TCs. Also, the need to enhance exchange of good practices, what works and centralise different stakeholders and what mechanisms work for them. Not just copy and paste but see what can work in another environment.

Annex 17.2.4 Interactive session

Following the initial introductory part, the meeting continued in plenary with an interactive session aimed at capturing participants' perspectives on the Policy Options under consideration in the feasibility study. The session consisted of a series of poll questions, each designed to gather participants' initial reactions. After each poll, an open discussion took place to explore the results in more depth, allowing attendees to raise additional points, share practices and experiences, and examine the implications of the possible interventions at hand.

Question 1: To what extent do differences across Member States in recognising TCN qualifications create difficulty for your authority?

Polls:

Option	Percentage
Not at all	41%
To a limited extent	23%
To a moderate extent	32%
To a large extent	5%

Respondents: 22

Open discussion:

- **The CA from NL** is responsible for the recognition of foreign healthcare diplomas. One issue encountered concerns applicants from third countries who go "shopping", applying for recognition procedures in several European countries at the same time. Applicants often compare different jurisdictions in terms of costs and language requirements before deciding where to continue the process. Since the recognition procedure in the Netherlands is free of charge, some applicants start a procedure there while also applying elsewhere. In some cases, authorities invest time and effort in initiating the recognition procedure, but applicants later decide to continue in another European

country and discontinue the process in the Netherlands. Although this does not occur very frequently, it still entails a use of time and resources. Language requirements also play a role in applicants' choices: Dutch can be difficult to learn and may require significant time, leading some applicants to move towards English-speaking countries where they already possess the required language skills.

- **The CA from IE** voted "To a moderate extent." Differences across jurisdictions can lead applicants to apply in multiple countries in order to identify where the recognition process is easier or quicker. This may result in applicants "shopping around" across different jurisdictions. In this context, some Member States that apply less strict criteria for recognising qualifications may represent a point of weakness within the EU system, as they may recognise qualifications that would not be recognised by other authorities. Once a qualification has been recognised in one jurisdiction, mobility within the EU may become easier. This can create difficulties for authorities that apply stricter recognition procedures, or possibly even overly strict ones, in the way the recognition process is implemented. Differences also exist with regard to examination requirements: some jurisdictions do not require an exam, whereas others, including Ireland, require examinations for nearly all applicants from outside the EU. As a result, applicants may choose to apply in jurisdictions where the process is cheaper, easier, or does not require an exam, obtain recognition there, and subsequently move elsewhere. Greater internal alignment in the way recognition standards are applied across Member States can be an important step to ensure consistency in the recognition process and in the regulation of professions.

Question 2: How feasible would automatic recognition (based on compliance with agreed common standards) be for some third-country qualifications in your sector?

Polls:

Option	Percentage
Not feasible	28%
Feasible only for a limited number of trusted training system	33%
Feasible with additional safeguards (test or adaptation periods)	39%
Broadly feasible	0%

Respondents: 18

Open discussion:

- **The CA from IE** mentioned that introducing automatic recognition for TCNs would be extremely challenging. Currently, applicants must hold a basic medical qualification aligned with the standards of an Irish medical degree and must also have completed an internship equivalent to the Irish internship in terms of duration and rotations. Experience assessing international internships shows significant variation across third countries. In Ireland, graduates are required to complete three months in medicine, three months in surgery, and three to four months in another approved rotation. In many non-EU countries, rotations may be shorter or focused on areas such as tropical medicine or other specialisations that would not form part of an Irish internship and would therefore not be considered equivalent for registration purposes. Given the wide variation across countries, introducing automatic recognition would require a substantial global review exercise to understand training structures and build a comprehensive knowledge base.

- The **contractor** asked whether the main challenge lies in the lack of knowledge and comprehensive information about training programmes and qualifications in third countries, or whether the problem relates to the feasibility of establishing a recognition system covering all countries.
- **One professional organisation from IE** indicated that both aspects represent challenges. When assessing qualifications - whether for general registration or specialist registration - there can be difficulties obtaining information from certain international regulators. For specialist applications, in the Medical Council case, postgraduate training bodies are asked to assess applications against the Irish curriculum and the minimum competencies expected. However, even these expert bodies often face difficulties obtaining detailed information about training programmes completed in some non-EU countries, which complicates the assessment process.
- **The CA from IE a**greed that both the lack of knowledge and structural differences in training systems are relevant challenges. It is necessary to understand third-country education models - specifically the definition and structure of these programmes, the verification of qualifications, and the security and credentialing surrounding them - as well as their actual content and how it differs from EU programmes. But beyond qualifications, automatic recognition must also consider professional practice after qualification. In the EU, practice after qualification is shaped by healthcare systems and professional roles within them. Professionals trained in non-EU contexts may hold strong qualifications, yet they operate within healthcare systems where practice models differ significantly. For this reason, extending automatic recognition beyond the EU raises concerns; while EU member states share a degree of alignment in education and training, the specific roles and deliverables of healthcare workers vary greatly across different global systems. Consequently, automatic recognition based solely on qualifications may not provide sufficient insight into actual clinical practice or the professional expectations of the next step.
- The **contractor** asked whether these challenges could be mitigated through strong quality assurance mechanisms and safeguard measures, not only for verifying training content but also for ensuring that the quality of training, for example in terms of hours and standards, is respected
- **The CA from IE** considered that this may be feasible to some extent but depends on the intended outcome. If the goal is to recognise qualifications more quickly, such mechanisms might be considered. However, assessing a single qualification or institution in isolation is not sufficient; the broader educational system, training model, and professional practice context also need to be examined. some countries, education systems may focus on producing large numbers of healthcare professionals, but these graduates may not transition easily into EU healthcare systems where professionals are expected to exercise a higher degree of independence, advocacy, and responsibility within the system. Extending recognition based solely on credentials without considering broader professional practice would therefore raise concerns.
- **The CA from IE** stressed that it is important to focus not only on education, but also on the application of skills. While education provides the theoretical foundation, professional competence relies heavily on the ability to apply knowledge in practice. The EU standards require a balance of theory and practice, but there is sometimes a tendency to place too much emphasis on educational credentials without giving sufficient

attention to the practical application of skills and the demonstration that a professional has reached the required standard in practice.

- **One professional organisation from IE** has previously explored equivalence assessments for internships from certain non-EU countries. One existing pathway involves recognising specific internships as equivalent to the Irish internship, which allows a more direct registration route for those doctors. However, the process of assessing these equivalences proved particularly challenging, mainly due to the difficulty of obtaining and analysing the necessary information. The process was discontinued several years ago because of these challenges. Expanding such an approach would likely require a large-scale exercise at EU level to review education and training systems in selected countries. This would involve not only reviewing curricula but also examining accreditation systems, quality assurance mechanisms, and how training programmes are approved and monitored. Such evaluations require significant resources even within national accreditation processes, and equivalent rigour would need to be ensured in third countries. Consequently, if automatic recognition is the chosen path, it may involve significant complexities. Even if a form of automatic recognition were introduced for third-country nationals, it would be complex to implement and make accessible, and significant groundwork would be required beforehand. In addition, once certain qualifications or countries were accepted under an automatic recognition framework, you would have to ensure that the standards and qualifications originally reviewed remain valid. Continuous monitoring would be necessary to ensure that training standards and programme structures remain consistent over time in these countries. This would require ongoing oversight and a great deal of follow-up work.
- **The CA from NL** stressed that establishing an automatic recognition system would involve a substantial amount of preparatory work. Furthermore, the feasibility of such a system depends largely on the specific profession concerned. While the discussion primarily focused on doctors and nurses, many other healthcare roles may be easier to integrate into an automatic framework. In the Netherlands, for instance, dentists, doctors, and nurses undergo assessments evaluating both knowledge and practical skills, with a particular emphasis on the latter. In contrast, other healthcare professions are evaluated solely through documentation review rather than practical exams. For these roles - such as physiotherapists, speech therapists, and others among the regulated healthcare professions in the Netherlands - automatic recognition procedures might be more straightforward to implement. This explains why feasibility varies significantly across different professions.
- **The CA from EE** asked whether a system that still requires an exam for registration could be considered automatic recognition. The **contractor** clarified that the presence of safeguards such as exams or adaptation periods would mean that recognition would not be strictly automatic. Instead, the concept could refer to simplified procedures in which certain steps are streamlined or skipped, while additional measures such as tests or adaptation periods could still be required before full recognition is granted.
- The **contractor** asked whether fast-track or accelerated procedures - such as those reportedly used in Ireland - could represent an alternative to automatic recognition and invited participants to share their experience.
- **A professional organisation from IE** stressed that certain types of fast-track pathways actually exist for doctors. For example, following Brexit, UK doctors could no longer benefit from automatic recognition under the directive. Given the close alignment

between Irish and UK medical training systems and the existence of intercollegiate postgraduate training structures, a specific pathway was introduced for UK doctors, which essentially works the same. This pathway operates through an internship equivalence approach and functions effectively as a fast-track route. It allows UK doctors to apply based on their internship and proceed through a simplified process, reflecting the high degree of alignment between the two systems. Maintaining this mobility between the UK and Ireland is considered essential, given the high volume of doctors moving between the two jurisdictions. In addition, the Medical Council is exploring a pilot scheme to accelerate the procedure of certain specialist doctors from selected non-EU countries where training standards are known to be comparable, such as the United States, Canada, or Australia. This initiative is still at an early stage. Research has identified specialties facing significant shortages in Ireland, such as psychiatry and general internal medicine. The Medical Council is currently engaging with postgraduate training bodies to explore whether a streamlined application could be developed for these specialties. The aim would be to facilitate the process while maintaining standards and ensuring patient safety.

- **The CA from MT** explained that although the standard of UK GMC qualifications is well-recognized, automatic recognition no longer applies to them; however, Malta utilizes a system virtually identical to the automatic one. As previously noted, medical training - especially for specialist accreditation - can differ significantly even between EU member states, and even more so regarding third-country qualifications. Experience with doctors from countries such as Ukraine, Serbia, and Turkey has led to the establishment of specific evaluation procedures in Malta. This process involves reviewing transcripts to assess the level, skills, competencies, and duration of training. In cases where there is a governmental need for a specific specialist, the practitioner undergoes a period of supervised practice. Rather than '"adaptation", this process is defined as a supervised employment within the specific specialty, conducted under the guidance of mentors in Malta. The duration of this period depends also on the individual's capacity to demonstrate their proficiency in the field. Following a period of approximately three to six months, if the individual is deemed qualified, a recommendation is made for their inclusion in the specialist register. Based on ten years of experience as a Registrar, it is clear that this process is challenging; there is no universal "cut-off" point, as evaluations must be conducted on an individual basis too, even for candidates from the same country or university. Consequently, the implementation of automatic recognition for medical specialties is considered highly problematic and potentially dangerous. While it may be possible to streamline training for certain other professions, medical specialisation involves more than just obtaining a master's degree or a qualification. It requires continuous mentoring, supervision, and assessment within a specific training program. Therefore, while comparability may be explored for some professions, extreme caution is required regarding medical specialisation. In this context, automatic recognition for third-country qualifications is viewed as a significant risk to safety. Therefore, while comparability may be explored for some professions, extreme caution is required regarding medical specialisation. In this context, automatic recognition for third-country qualifications is viewed as a possible risk to patient safety.
- **The CA from IE** has taken a slightly different approach from the Medical Council regarding recognition of UK qualifications after Brexit. No deviation was introduced to maintain automatic recognition; instead, automatic recognition ceased and all applications are now assessed individually. A significant shift has been observed in applications from the UK, with the majority now requiring compensation measures. While

there had been discussion about continuing automatic recognition due to the UK's previous alignment with EU standards, further examination of transcripts, education, and qualifications has shown that these do not always meet the required level, and compensation measures are therefore applied. This experience was described as demonstrating that a broad approach to automatic recognition may not be appropriate. If automatic recognition had continued, these applicants would have been granted recognition without additional checks, whereas the current system has identified deficits in qualifications. In cases where there is a critical mass of applicants from a specific jurisdiction, a different approach is applied. Given the volume of applications (approximately 12,000 per year from outside the EU), it is possible to conduct analysis at jurisdiction level over a period of five to ten years. Where consistent patterns emerge - for example, applicants from a given country systematically requiring compensation measures - a tailored pathway can be developed. This allows applicants to move more quickly through the process and proceed directly to compensation measures, rather than undergoing a full assessment each time. This approach does not grant automatic recognition but streamlines the pathway based on evidence. Accelerating automatic recognition would introduce a risk to the public, as it presumes a high level of equivalence based on the jurisdiction of origin. Two distinct approaches are therefore identified: the expansion of automatic recognition, which is not supported, and the possibility of streamlining qualification assessment processes, particularly where there is a critical mass of applicants, in order to make procedures quicker while maintaining the requirement for compensation measures.

Question 3: To what extent do documentation requirements slow down recognition procedures?

Polls:

Option	Percentage
Not at all	11%
To a limited extent	33%
To a moderate extent	50%
To a large extent	6%

Respondents: 18

Open discussion:

- **The CA from IE** said that documentation requirements can be extensive, particularly for specialist registration, where applicants are required to submit a large portfolio of evidence. However, given that the primary focus in health professions is patient safety, it is necessary to ensure that all applicants meet a high standard and that there are no educational gaps or shortcomings. Reducing documentation requirements would make it difficult to maintain this level of assurance, and it's difficult to imagine a clear alternative approach that would allow for fewer documentation requirements while ensuring the same level of scrutiny.
- **The CA from SE** explained that the system is primarily focused on demonstrating knowledge and skills rather than submitting extensive documentation. As a result, documentation requirements are limited and do not significantly slow down procedures, motivating the vote for "not at all". The system relies on exams and internships for most professions, which reduces the emphasis on documentation. This approach also informs the position on automatic recognition, which is considered potentially problematic, as priority is given to demonstrating practical skills and competencies rather than relying on formal documentation.

- **The CA from IE** mentioned that documentation requirements can significantly slow down recognition procedures. The assessment of transcripts and syllabi for incoming candidates is time-consuming and can also be burdensome for them. For example, issues can arise when information is lost in translation or when files need to be resubmitted multiple times. Applications cannot be processed until all mandated material is available. Additional time is also essential to ensure that individuals understand distinctions such as clinical versus theoretical components. For instance, clinical hours may be provided, but it may not be clear where these were undertaken, and they must be mapped against national standards. It is not possible to make decisions based on incomplete or incorrect information - such as when only 60–70% of the required data is available - and it is mandatory to obtain the relevant records. In these cases, delays may also occur in order to request information from third-country regulators or educational institutions or when duplicate evidence must be resubmitted.
- **The CA from IE** mentioned that the burden of proof regarding qualifications, skills, and competencies lies with the applicant. Efforts are made to ensure transparency in processes and to provide proactive communication so that applicants do not apply without having all required documentation prepared. Delays are therefore not considered to be caused by the authority, but rather by the absence of sufficient evidence provided by applicants. There is no right to registration or recognition, only a right to a fair process. In this context, emphasis is placed on making decisions as efficiently as possible once the available documentation has been submitted. If applicants consider that they have provided all necessary documentation, a decision can be made quickly, including a decision not to recognise the qualification. It is considered preferable to make a timely decision based on the available evidence rather than extending the process over a long period while waiting for documentation that may not be provided. Responsibility for providing complete and adequate documentation remains with the applicant.
- The **contractor** specified that the focus is on the candidates' perspective, inquiring which records are most difficult to provide and contribute most to delays, including whether translations play a significant role**.**
- **The CA from IE** makes a significant effort to ensure that applicants submit complete applications, and in most cases a relatively high level of completeness is achieved at the point of submission. Applicants are also responsible for obtaining translations. Thus, the main challenge does not generally lie in obtaining documentation, but rather in interpreting it. Difficulties arise in understanding the content of syllabi and transcripts, including identifying core modules, defining what constitutes practice in a given country, and assessing the level of knowledge and skills achieved. Translating these elements into an EU context can be complex. For example, recent applications from China have required efforts to distinguish between western medicine and traditional Chinese medicine, as transcripts may simply refer to “medical practice” or “clinical placement” without clearly specifying the underlying model. This creates difficulties in interpreting the actual content of training. In terms of document availability, transcripts and syllabi are generally accessible, and when they are not, there is usually a valid reason. It is considered unusual for qualified professionals not to have access to such documents without a legitimate explanation, and where these documents cannot be provided, applications are not progressed. The most challenging documents to obtain are often certificates of current professional status or certificates of good standing. In some countries, like UAE, these are only issued after a minimum period of employment. In

others, they may not be issued to non-citizens, even if they have trained or worked in that country. There are also cases - such as in certain African countries - where authorities may restrict the issuance of such documentation in order to discourage doctors from leaving the country. These factors can create significant barriers for third-country applicants.

- The **contractor** asked Eszter Lukacs for further clarification on the steps involved in assessing skills, as these appeared to be more prominent in the Swedish case than the documentation.
- **The CA from SE** stressed that the procedure starts with the applicant submitting all available documentation, which is then assessed. It is possible to receive a decision allowing the applicant to proceed to the next step, namely the exam, even if the documentation is not complete. This is based on what is described as a probability level, meaning that it can be shown that the applicant has the relevant education even in the absence of a diploma or transcript of records. If the available documentation allows to reach this probability level, the applicant can move on to the next step and take the exam. A positive decision can therefore be granted even without full documentation, provided that the applicant can demonstrate their educational background through other means. These may include certificates from educational institutions, possibly in combination with work certificates or other types of certifications, such as board certifications. The assessment is based on all documentation available to the applicant, and a decision is made on whether the individual can proceed to the next stage, which is the examination. This approach does not apply to medical specialists, for whom it is very difficult to assess competencies through examinations alone.

Question 4: Which measures would most reduce the time needed to assess applications?

Polls:

Option	Percentage
Verified digital credentials	58%
Better information on education and training systems	32%
Standardised assessment templates	5%
Shared recognition precedent	5%

Respondents: 19

Question 5: Would common EU-level tools reduce the time and effort needed for your qualification assessments? (examples: shared databases of third-country training programmes, standardised assessment templates, pooled recognition precedents, digital credential verification systems linked to third-country authorities)

Polls:

Option	Percentage
No reduction	0%
Slight reduction (up to 10%)	14%
Moderate reduction (10-25%)	67%
Significant reduction (more than 25%)	19%

Respondents: 21

Open discussion:

- **The CA from IE** said that a shared and consistent recognition process would ensure less “shopping around” and increase public and professional safety.
- **The CA from IE** mentioned that digital verification systems, particularly for education and assessment, would improve the speed and flow of the process. Moving away from paper-based applications, which can prolong procedures, would have a positive impact. The verification of digital records would therefore contribute to making the process more efficient.

Question 6: How often do you lack sufficient information to determine whether a third-country qualification includes the practical competences required for regulated professions in your sector?

Polls:

Option	Percentage
Rarely (less than 10% of cases)	14%
Occasionally (10–25%)	29%
Frequently (25–50%)	57%
Very frequently (more than 50%)	0%

Respondents: 14

Open discussion:

- **The CA from IE** mentioned that it is often possible to obtain documentation from applicants regarding their qualifications, but it can be difficult to understand the content of modules within their education. For example, a large number of applications are received from the Philippines, where the structure of education differs significantly from the EU model. Instead of distinct placement modules, there are what are referred to as related learning environments, which are large modules spanning extended periods, sometimes up to half a year. For this reason, considerable effort is required to understand what is included within these modules, as this is not always clearly detailed in syllabi or transcripts. Often the content of the module is quite good, but it represents a very different model of education compared to the EU model. This is an example where practical competencies achieved through these modules can be very difficult to interpret, because the model of clinical education is not structured as it is in the EU. In the EU, theory and clinical components are very separate across health professions, whereas in other countries they may be combined within a single module or programme. When it is combined, it may not be clear how much of that module was clinical and how much was theoretical, for whether it consisted of a specific number of hours of clinical practice and a specific number of theory hours, or vice versa. The challenge is not only at the jurisdictional level, but can also vary by school within a jurisdiction, where different institutions may have different approaches to education. This can make interpretation of transcripts and syllabi very difficult and complicated at an early stage. Acquiring knowledge about these systems, however, helps to improve the process over time, as understanding increases through experience.

Question 7: Would structured EU-level information on third-country education and training systems materially improve your assessment capacity? (examples: comparative studies, quality assurance mapping, cooperation agreements)

Polls:

Option	Percentage
No improvement	0% (0)

Option	Percentage
Slight improvement	47% (9)
Moderate improvement	37% (7)
Significant improvement	16% (3)

Respondents: 19

Open discussion:

- **The CA from IE** stated that a structured EU-level information system on third-country education and training systems is considered a valuable idea, but it is necessary to consider that maintaining a comprehensive database of all educational institutions and providers worldwide would involve a huge amount of work and would risk losing accuracy quickly due to constant changes. It may be more practical to focus on aligning practices within the EU, ensuring that all member states are applying consistent standards. Support has been given to the concept of a point-of-entry or compatibility exam to verify whether an applicant's qualifications and practical skills are compatible with EU standards before proceeding to any adaptation or compensation measures. A massive database could be useful, but it would require constant updates to remain valid, and there are no known examples of such systems being successfully maintained by third countries.

Question 8: If comprehensive information on key third-country education and training systems were available, by how much could your assessment time for complex cases be reduced?

Polls:

Option	Percentage
No reduction	0%
Less than 10%	11%
Between 10% and 25%	89%
More than 25%	0%

Respondents: 18

Open discussion:

- **The CA from IE** mentioned that comprehensive information on key third-country education systems is expected to significantly reduce the time required for complex cases. A central, well-structured, evidence-based source would support the assessment of education and qualifications, especially for cases that are resource-intensive and require substantial human interaction. Having pre-verified and EU-level information would provide a strong foundation for assessments and likely reduce the time needed. Moreover, a massive database providing verifiable results and authentic credentials is considered a valuable concept. In practice, however, maintaining such a system is expected to be extremely challenging. Existing examples, such as the Internal Market Information (IMI) system at EU level, demonstrate that many countries do not fully engage with or utilise the system for this purpose. Relying on an EU-level database would require substantial trust in its accuracy, timeliness, and maintenance. Given the limitations observed with the IMI, the practical implementation and upkeep of such a database for third-country qualifications appear highly difficult.

Question 9: To what extent is EU-level action needed to reduce fragmentation in TCN qualification recognition in your professional sector, compared to what Member States could achieve through bilateral cooperation alone?

Polls:

Option	Percentage
To a large extent — EU action would enable Member States to effectively address challenges faced	17%
To a moderate extent — EU action would accelerate convergence already underway	61%
To a small extent — bilateral cooperation would be largely sufficient	17%
Not at all — Member States are already converging adequately	6%

Respondents: 18

Question 10: Do you think that common EU rules (e.g. minimum standard on deadlines, fees, number and type of documents/translation requirements) would be beneficial to reducing…?

Polls:

Option	Percentage
Fragmentation of procedures both among and within Member States	18%
Time in the assessment of qualifications	9%
Administrative burden Increasing transparency and comparability	45%
Fraud risks	0% (0)
Other	27%

Respondents: 11

Open discussion:

- **The CA from IE** highlighted that all potential benefits indicated in the poll question would be relevant.
- **The CA from DE and PL** mentioned that it is unclear how establishing procedural rules could fall within EU competence, given that the matter concerns third-country qualifications, which lie outside the scope of the Professional Qualification Directive.
- The **Contractor** and the **DG-EMPL** clarified that the feasibility study being undertaken aims to inform an impact assessment on potential legislative and non-legislative options. The Directive 2005/36 currently governs the mobility of EU citizens in accessing regulated professions and sets procedural rules. One potential measure under consideration is to mirror these rules for third-country nationals, in order to provide greater transparency, predictability, and certainty where formal recognition of qualifications is required. This context frames the discussion on potential EU-level measures and their scope.

Question 11: To what extent is formal cooperation with third countries needed to strengthen understanding and trust on third-country qualifications?

Polls:

Option	Percentage
To a large extent	56%
To a moderate extent	0%
To a small extent	0%
No extent	44%

Respondents: 18

Open discussion:

- **The CA from MT** stated that a system similar to the IMI, through which a competent authority could verify and confirm certain qualifications of third-country nationals, would be beneficial**.**

Annex 17.2.5 Conclusion

The Contractor thanked participants for their attendance and provided an overview of the ongoing activities in the context of the Study under Action 3. In particular, the Contractor informed participants about the ongoing survey targeting competent authorities and issued a final reminder following the extension of the deadline to 19 March. In addition, the Contractor invited participants to complete a follow up data collection form on costs by 16 March, which was circulated by email after the meeting. This data form aims to collect information on the types of costs incurred by authorities during qualification checks in the context of recognition of qualifications and validation of skills of TCNs

Annex 17.3 Online Focus Group 3 (FG3) on labour migration with labour migration authorities and International Organisations (IOs)

Annex 17.3.1 Agenda of the meeting

The following items were discussed as part of the meeting agenda:

Table 38 - Agenda of FG on labour migration

Time	Agenda item
09:30 – 09:40	**Welcome** Opening remarks by DG EMPL Presentation of the objectives of the focus groups and housekeeping rules
09:40 – 10:00	**Introductory session** Presentation of the study Recap of problem definition Presentation of policy objectives and identified POs
10:00 – 10:15	**Q&A**
10.15 – 10.30	**Coffee-break**
10:30 – 11.45	**Focused discussion (in plenary)** Interactive discussion with polls questions on the impacts of the identified policy options
11:45 – 11:30	**Wrap-up and next steps** Summary of key takeaways by facilitator Explanation of how the inputs will feed into the study Closing remarks and thanks

Annex 17.3.2 Opening remarks

The **Deputy Head of Unit B.5 in DG EMPL** opened the meeting by outlining the Skills Portability Initiative, particularly Action 3, as a key priority of the current Commission mandate, situated within the broader framework of the Union of Skills, which aims to ensure that TCNs can fully use their skills and competences when entering the EU Single Market.

Annex 17.3.3 Presentation by the study team

The **Contractor** presented the problem tree and all its constituting elements: core problem, its consequences, but most importantly the drivers of the problem and their underlying issues.

The **Contractor** also briefly presented the objective tree , linking the core problem and the three identified drivers to one general and three specific policy objectives. The contractor clarified that the identified drivers and the resulting policy objectives will guide the development of relevant policy measures.

Annex 17.3.4 Q&A

The Contractor opened the floor for discussion; however, no question was raised regarding to the Contractor's presentation.

Annex 17.3.5 Interactive session

Following the initial presentation, the second part focused on stakeholders' perspectives concerning the problems and related drivers affecting the recognition of professional qualifications of TCNs; possible EU measures to address the identified problems; and the likely positive and negative impacts of such measures.

The discussion was organised around three dimensions, each corresponding to a distinct macro-policy area: "Heterogeneity and fragmentation"; Procedural complexity; "Cooperation with third countries". For each dimension, a sequence of polls was followed by an open discussion. The polls provided a rapid quantitative overview of participants' collective assessments, while the follow-up discussions explored the reasoning underpinning their responses. After the three thematic blocks, the session concluded with two cross-cutting questions on the overall outlook and the expected timing of benefits.

Group 1: Heterogeneity and fragmentation

The first block of questions, taking as a starting point the differences in national approaches to the recognition of professional qualifications for TCNs, examined how these affect migration governance and whether the introduction of common EU rules could help reduce the resulting duplication of efforts. Rules and procedures vary considerably across Member States and, in some cases, within the same country, where migration authorities and professional recognition bodies may operate with limited coordination

Question 1: To what extent do the current rules on TCN recognition complicate migration governance in your country?

Polls:

Option	Percentage
Not at all	12%

Option	Percentage
To a limited extent	31%
To a moderate extent	25%
To a large extent	12%
Not sure	18%

Respondents: 16

Open discussion:

- **The migration authority from BE** highlighted that in Belgium (Flanders), verifying the authenticity of documents submitted by non-EU nationals remains a significant challenge. The risk of issuing single permits on the basis of falsified documents represents a concrete concern. Work is ongoing to establish legislation and a reliable system to verify diplomas and supporting documents. However, developing and implementing such a framework requires time, coordination and technical integration with existing backend systems. Contacts with non-EU countries often result in fragmented or unclear referral pathways between institutions. A structured and internationally recognised verification framework would support more secure procedures for non-EU nationals.
- **The migration authority from PL** mentioned that a key issue concerns the differentiation between recognition for regulated professions and non-regulated professions. Procedures for regulated professions require stricter safeguards than those for free-access occupations. In Poland, TCNs generally follow the same qualification recognition route as Polish nationals, including diploma recognition and credentialing by competent authorities or professional bodies. Sectoral exemptions apply in specific areas, notably healthcare. Further reflection is needed on how recognition systems distinguish between regulated and non-regulated pathways.

Question 2: Would the introduction of common EU rules on the recognition of professional qualifications of TCNs reduce administrative duplication between migration and recognition procedures?

Polls:

Option	Percentage
No reduction	18%
Slight reduction	6%
Moderate reduction	12%
Significant reduction	43%
Not sure	18%

Respondents: 16

Open discussion:

- **The migration authority from BE** stated that EU rules would first require transposition into national legislation. Beyond legislation, implementation would depend on operational tools, shared platforms and trusted verification channels. A common system identifying recognised institutions or authentic document sources could address current verification

gaps. At present, national authorities lack a clear reference point for confirming whether a diploma or institution is genuine. While EU-level rules could provide a starting framework, effective implementation would still require coordination between national authorities and adaptation to domestic migration systems.

- **An IO** stated that common EU framework could establish a shared understanding of recognised qualifications and reference standards. Even if Member States maintain additional national requirements, a harmonised baseline would reduce the need for each country to conduct independent assessments from scratch. Currently, each Member State performs its own checks without a common reference framework, resulting in duplication of work. A hypothetical example illustrates this: if EU rules defined qualification standards for a specific profession (e.g. electrician), Member States could rely on that baseline for comparison. Harmonisation of procedures, where feasible within shared competence limits, could further streamline processes while respecting national authority.

Question 3: If common EU rules were introduced, by how much could the administrative burden on your migration system be reduced?

Polls:

Option	Percentage
No reduction	15%
Less than 10%	0%
Between 10% and 25%	23%
More than 25%	7%
Not sure	53%

Respondents: 13

Open discussion:

- **The migration authority from BE** suggested that EU legislation could provide a structured response to a common challenge and support the development of clearer national procedures. At present, authorities receive a wide range of documents, including fraudulent ones, without a consistent verification policy or reliable reference mechanism. In some cases, institutions cannot be located or verified. For regulated health professions, recognition procedures (e.g. via NARIC) operate separately from single permit procedures. For non-regulated professions, such as construction, professional experience must be verified directly with previous employers, often through time-consuming manual checks. In the absence of reliable verification tools, decisions sometimes rely on the documentation provided without independent confirmation. A common EU policy, potentially supported by digital tools or AI-based systems, could strengthen authentication capacity and reduce the risk of abuse of migration channels.
- **The migration authority from PL** highlighted that in Poland, TCNs follow the same recognition process as nationals, including diploma recognition and credentialing. Simplified procedures apply in healthcare, including fast-track mechanisms for Ukrainian nationals and supplementary examinations for certain professionals. Introducing harmonised EU rules could represent a substantial systemic change, particularly if TCNs were integrated into frameworks similar to those applicable to EU nationals. Such

changes would affect multiple sectors and authorities. An additional consideration concerns transferability: if recognition granted in one Member State became valid in others, differences in procedural strictness could create unintended gateway effects, potentially encouraging applicants to seek recognition in jurisdictions with less demanding requirements.

- In Spain, recognition and migration procedures operate independently. Qualification recognition can be completed online without residence in Spain and does not interfere with migration processes. The competent authority is the Ministry of Science, Innovation and Universities, responsible for both academic and professional recognition. Given this separation, EU rules would not necessarily reduce administrative burdens. While common rules could offer clarity, binding measures might introduce additional restrictions. Non-binding guidelines, cooperation platforms and tools such as IMI are viewed as constructive alternatives that support coordination without limiting national flexibility.

Question 4: To what extent EU action is needed, compared to what can be achieved by Member States acting alone, to reduce heterogeneity and fragmentation in the recognition of professional qualifications of third-country nationals?

Polls:

Option	Percentage
To a large extent	28%
To a moderate extent 10%	71%
To a small extent	0%
Not at all	0%

Respondents: 14

Open discussion:

- **The migration authority from ES** highlighted that harmonisation and standardisation at EU level would encourage consistent implementation across Member States. Common guidelines or agreed minimum requirements for recognising third-country qualifications would promote alignment and reduce divergence in national approaches, helping to standardize processes.
- **The migration authority from BE** mentioned that harmonisation could reduce fragmentation in Belgium's two-step system, where the federal level manages residence permits and regions manage work permits. Faster and more reliable verification of supporting documents would help accelerate decision-making. Given labour market shortages across the EU, reducing delays in work authorisation procedures is considered a priority.

Group 2: Procedural complexity

The second set of questions addressed the procedural steps that TCNs must navigate from arrival in the host country to gaining access to qualified employment. In particular, the emphasis was put on the administrative burden associated with these procedures and on whether simplification measures - such as binding deadlines, streamlined documentation requirements, and digital processing - could help reduce delays and facilitate access to the labour market.

Question 5: In your national context, to what extent do TCNs undergo duplicated qualification assessments — once as part of migration procedures (visa/work permit) and once for access to a regulated profession?

Polls:

Option	Percentage
No duplication — a single assessment serves both purposes	11%
Limited duplication — some overlap but largely coordinated	33%
Significant duplication — largely separate processes assessing similar elements	33%
Full duplication — two entirely independent assessments with no coordination	22%
Not sure	0%

Respondents: 9

Open discussion:

- **The migration authority from ES** highlighted the difficulty in answering this question without direct experience of both migration procedures and professional access requirements. The two processes involve separate entities, and respondents may have limited experience across both, which could explain the low response rate.
- In France, to enter the labour market and exercise a regulated profession, individuals must demonstrate authorisation to practice, including verification of relevant French diplomas. For example, medical doctors must complete the procedure to be authorised to practice. Only once this professional authorisation is granted can the visa or work permit be issued. Thus, in France, the professional authorisation is a prerequisite for the migration procedure.

Question 6: Would binding deadlines, simplified documentation, and digital processing reduce the time to access qualified employment for TCNs?

Polls:

Option	Percentage
No reduction	0%
Slight reduction	0%
Moderate reduction	54%
Significant reduction	36%
Not sure	9%

Respondents: 11

Open discussion:

- In Belgium, digital procedures were accelerated following the COVID-19 crisis. The existing digital system allows applicants to log in and track their applications, improving overall efficiency. However, constraints remain: additional documents (e.g., payslips) may be required, which can extend processing times for work permits or single permits.

For non-EU residents still abroad, access to regional digital systems (e.g., Flanders) is limited. For example, professional card applications must still be submitted via the applicant's embassy, which then forwards documents to Belgian authorities. Full digitalisation has not yet been achieved, but implementation is ongoing.

Question 7: If full simplification and digitalisation measures were implemented, by how much could the overall time-to-qualified-employment be reduced?

Polls:

Option	Percentage
No reduction	0%
Less than 10%	9%
Between 10% and 25%	9%
More than 25%	9%
Not sure	72%

Respondents: 11

Open discussion:

- **An IO** selected "not sure" because the impact depends heavily on the specific implementation of measures. Past experiences with EU directives (e.g., the single permit directive) show that even well-designed legislative or digital frameworks do not automatically reduce processing times or improve migrant experiences. Effectiveness depends on national context, existing frameworks, and prior digitalisation. In Belgium, for instance, as said by Isabel, some processes are already digitalised, limiting potential gains from further measures. Simplification could still provide benefits, but the practical impact will vary depending on implementation details.

Group 3: Cooperation with third countries

The third series of questions explored the potential role of collaborative arrangements with non-EU countries in facilitating the recognition of qualifications held by TCNs. Attention was given to the challenges that arise when verification of qualifications relies on information from institutions in the country of origin, and to whether structured cooperation mechanisms could help address these issues.

Question 8: Would structured cooperation agreements with third countries (e.g. Talent Partnerships or bilateral frameworks) materially improve recognition outcomes?

Results:

Option	Percentage
No improvement	0%
Slight improvement	0%
Moderate improvement	46%
Significant improvement	46%
Not sure	7%

Respondents: 13

Open discussion:

- Ireland has not yet opted into Talent Partnerships but is currently examining the possibility of joining the EU Pakistan Talent Partnership as an observer. As part of this process, Irish representatives visited Pakistan and met with relevant ministries, which expressed willingness to support skills recognition and validation within the framework of targeted labour mobility schemes. These initiatives focus on specific sectors, such as care work and construction, where training programmes and qualifications can be validated prior to departure. Technical training academies and universities in Pakistan also offer courses delivered in English that are specifically designed to prepare participants for employment abroad. In this context, cooperation frameworks with countries of origin are considered capable of improving recognition outcomes when supported by active engagement from partner institutions.
- **An IO** highlighted that within the MPF, labour mobility projects developed under Talent Partnerships increasingly follow a skills partnership model in which training components are integrated from the outset. In this approach, qualification recognition is embedded within the entire mobility pathway and forms part of the structured cooperation between Member States and third countries. This framework facilitates both recognition processes and skills development for prospective migrants. Additional benefits could emerge if the outcomes of these partnerships were linked to a broader European recognition framework. In such a case, recognition processes developed in collaboration with one Member State could be more easily leveraged across the EU, strengthening the value of the institutional ecosystem created through these partnerships, need to do particularly for each profession and for each country specifically.
- **An IO** highlighted that experiences from the implementation of a Talent Partnership between Morocco, Tunisia and Italy illustrate how these initiatives connect policy areas that are typically addressed separately, including migration, skills development and employment. The partnerships also support trust-building and structured dialogue between EU Member State authorities and institutions in partner countries. In this framework, accreditation bodies in the EU collaborate with training and vocational education institutions in countries of origin. Participants completing these programmes receive dual qualifications recognised both by employers in the country of origin and in the EU Member State involved. Highlighted that additional value could be achieved if such qualifications were recognised across multiple Member States rather than only in the country participating in the partnership.

Question 9: If effective cooperation frameworks were in place with key third countries, by how much could verification-related delays be reduced?

Polls:

Option	Percentage
No reduction	0%
Less than 10%	0%
Between 10% and 25%	27%
More than 25%	18%

Option	Percentage
Not sure	54%

Respondents: 11

Question 10: To what extent an EU action is needed, compared to what can be achieved by Member States acting alone, to improve understanding and trust with third countries on qualification recognition?

Polls:

Option	Percentage
To a large extent	14%
To a moderate extent	85%
To a small extent	0%
Not at all	0%

Respondents: 7

Open discussion:

- **The migration authority from BE** mentioned that bilateral frameworks and Talent Partnerships are seen as useful tools for strengthening cooperation with third countries. Such initiatives can help establish communication channels between institutions, improve mutual understanding of labour markets and create a shared language for discussing skills and qualifications. Suggested that EU-level initiatives could focus on countries that represent major sources of labour migration for multiple Member States. Targeted cooperation with these countries could generate added value both for external partnerships and for internal labour market needs across the Union.

Cross-cutting questions

Question 11: If no new EU rules on the recognition of qualifications of TCN are introduced, how would the situation evolve over the next 5 years from a migration governance perspective?

Polls:

Option	Percentage
It would improve through national reforms	0%
It would remain broadly stable	28%
It would worsen slightly (growing fragmentation, increasing TCN volumes)	71%
It would worsen significantly	0%
Not sure	0%

Respondents: 7

Open discussion:

- **The migration authority from BE** suggested that the future evolution of the system would also depend on national political decisions concerning the admission of third-country workers in response to labour shortages. In Belgium, certain restrictions have recently been introduced at the regional legislative level. However, without greater coordination or harmonisation at EU level, the situation could deteriorate. Addressing existing challenges would also require investments in administrative capacity, resources and time to streamline procedures and improve their efficiency.
- **The migration authority from PT** stressed that from the perspective of integration services in Portugal, fragmentation between institutions remains a key challenge. While mobility agreements with third countries exist, differences in the interpretation of skills and qualifications often create difficulties for both migrants and employers. Professional profiles may vary significantly across countries, even within the same occupation. For example, electricians trained in different countries may possess different skill sets. Establishing more consistent definitions of professional profiles across the EU could therefore support better recognition processes. Existing tools such as ESCO could contribute to this objective. The discussion also highlighted the importance of pre-departure guidance to help migrants prepare documentation and facilitate their integration into the labour market upon arrival. Stronger coordination between authorities responsible for migration procedures and those responsible for skills certification was considered essential.

Question 12: If no new EU rules on the recognition of qualifications of TCN are introduced, how would the situation evolve over the next 5 years from a migration governance perspective?

Polls:

Option	Percentage
Within 1 year	9%
1-3 years	9%
3-5 years	18%
More than 5 years	0%
Depended on complementary conditions	63%
Not sure	0%

Respondents: 11

Annex 17.3.6 Closing remarks

The **Contractor** thanked participants for their attendance and provided an overview of the ongoing activities in the context of the Study under Action 3. In particular, the **Contractor** informed participants about the ongoing survey targeting migration authorities and issued a final reminder following the extension of the deadline to Friday, **6 March**. In addition, the **Contractor** invited participants to complete a follow-up data collection form on costs by **15 March**, which was circulated by email after the meeting. This data form aims to collect information on the types of costs incurred by authorities during qualification checks in the context of labour migration.

Annex 17.4 Online Focus Group 4 (FG4) on information to TCNs with ENIC NARIC Centres, Public Employment Services (PES), and Civil Society Organisations (CSOs)

Annex 17.4.1 Agenda of the meeting

The following items were discussed as part of the meeting agenda:

Table 39 - Agenda of FG on information provision

Time	Agenda item
09:30 – 09:40	**Welcome** Opening remarks by DG EMPL Presentation of the objectives of the focus groups and housekeeping rules
09:40 – 10:00	**Introductory session** Presentation of the study Recap of problem definition Presentation of policy objectives and identified POs
10:00 – 10:15	**Q&A**
10.15 – 10.30	**Coffee-break**
10:30 – 11.45	**Focused discussion (break out room)** Interactive discussion with polls questions on the impacts of the identified policy options
11:45 – 11:30	**Wrap-up and next steps** Summary of key takeaways by facilitator Explanation of how the inputs will feed into the study Closing remarks and thanks

Annex 17.4.2 Q&A

The Contractor opened the floor for questions and discussion regarding the presentation of the study. The following issued were raised:

- **The ENIC NARIC centre from IT** asked whether the study includes a mapping of recognition and validation systems across Member States and whether a comparative reference framework exists. **The Contractor** explained that the study is conducting an ongoing mapping of access to regulated professions across Member States, focusing on selected professions (i.e. Nurses, doctors, healthcare assistants, electricians, crane operators), using desk research, interviews, surveys, and consultations to identify fragmentation and complexity of procedures.
- **The ENIC NARIC centre from FR** asked whether the study has identified professions with more harmonised or easier recognition, particularly in healthcare, and whether other professions show similar patterns. However, **the Contractor** stressed that harmonisation remains limited, no profession clearly stands out as more harmonised for

TCNs, and recent fast-track initiatives in some Member States (e.g. nurses) risk increasing divergence rather than convergence.

- **The PES from IT** inquired about the stakeholders involved in recognition and validation processes in other EU countries. **The Contractor** clarified that academic recognition is mainly handled by ENIC-NARIC centres, while professional recognition is organised nationally, typically involving ministries, professional bodies, or chambers, depending on the Member State.
- **DG EMPL** further explained that EU-level harmonisation applies only to EU nationals, with minimum training requirements limited to seven professions (six healthcare professions and architects), while TCNs are mostly subject to national rules, especially for qualifications obtained outside the EU.
- **ENIC NARIC Centre from IE** asked whether it is envisaged that Member States would develop national validation systems independent from institutional frameworks, given the diversity of validation purposes. **The Contractor** replied that validation is highly fragmented and discretionary, often employer- or institution-driven, and that the study focuses mainly on recognition of professional qualifications, while exploring scope for improving procedural transparency, without interfering with national competences. **DG EMPL** added that the initiative is labour-market driven, does not aim to establish an EU-wide validation system, and seeks instead to make skills more visible and usable for labour-market integration.

Annex 17.4.3 Focused session

Following the plenary, the focus group moved into an interactive session structured around a series of poll questions, exploring the potential impacts of different policy objectives related to the recognition of qualifications obtained in third countries. Participants were divided into two break-out rooms: Room 1 with ENIC-NARIC centres and Room 2 with PES and CSOs. Each session lasted approximately 75 minutes and followed the same format: attendees were invited to respond to the poll questions, after which an open discussion explored the reasoning behind their answers. Additional comments could also be submitted via the chat.

Annex 17.4.4 Break out room: ENIC NARIC centres

Question 1: To what extent do you think that common EU guidelines, would be necessary to ensure consistency of practices among Member States?

Polls:

Option	Percentage
To a large extent	20%
To a moderate extent	70%
To a low extent	10%
No extent	0%

Respondents: 10

Open discussion:

- **The ENIC NARIC centre from IE** highlighted that greater usefulness was associated with a centralised EU mechanism for the verification of qualifications, aimed at confirming authenticity and preventing fraud. A clearinghouse for credential verification could support all recognition authorities by concentrating expertise and accelerating recognition and validation processes. Such a system could also provide direct access to information on quality assurance arrangements, programme learning outcomes and institutional accreditation. The current situation often requires each authority to verify authenticity independently, while information on programme content and learning outcomes is sometimes difficult to access and evaluate. Addressing these issues at EU level could significantly improve efficiency in recognition and validation processes.
- **The ENIC NARIC centre from FI** mentioned that the Finnish system already provides clear legislation governing the recognition of qualifications of third-country nationals, ensuring equal access to regulated professions for both EU and non-EU nationals. Any potential EU action should therefore remain limited to general principles at a high level. Education systems, qualification structures and the design of national qualification frameworks should remain under national competence.

Question 2: Beyond guidelines which of the following soft measures can be more effective in reducing heterogeneity and fragmentation of procedures among Member States?

Polls:

Option	Percentage
Mutual learning programmes and comparative studies on national recognition and validation practices	9%
Benchmarking and capacity building exercise promoted by CEDEFOP	0%
Commission communication/recommendation on proportionate documentation requirements	18%
Best practices exchanges	72%

Respondents: 11

Open discussion:

- **The ENIC NARIC centre from RO** suggested that exchanges of best practices can be particularly effective, since they encourage practical learning rather than imposing rigid rules. Member States can observe successful approaches already implemented elsewhere and possibly adapt evaluation methods, digital tools and administrative procedures to their own systems. Sharing experiences can improve efficiency and transparency, reduce processing times and increase consistency in decision-making.
- **The ENIC NARIC centre from NL** agreed with RO, underlined that existing initiatives demonstrate the usefulness of such exchanges. For example, a recent initiative facilitated by the Benelux Secretariat brought together competent authorities responsible for recognition of healthcare qualifications. In Germany, despite the complexity of a federal recognition system, harmonisation efforts supported by federal investment and information exchange have shown positive results. Trust-building, information exchange and best-practice sharing can support the effectiveness of guidelines and reduce uncertainties, including those related to documentation requirements.

- **The ENIC NARIC centre from IE** stressed that if recognition and validation for labour market purposes are to be taken seriously, these 'soft' options are just not needed. Commission recommendations can play an important catalytic role, as illustrated by the 2012 Recommendation on the validation of non-formal and informal learning. While implementation varied across countries, the recommendation helped stimulate ministerial attention, mobilise funding and trigger additional initiatives. The presence of common targets - such as the objective for Member States to have validation systems in place by 2018 - also contributed to strengthening policy attention and monitoring processes. At the same time, a potential concern was highlighted: individuals whose qualifications are recognised for labour market purposes may expect that recognition to be transferable across different jurisdictions and systems, which is not always the case in practice. For this reason, close collaboration with other Commission initiatives on validation and recognition is considered essential. Professional recognition cannot be treated as a standalone process, since recognition ultimately concerns the individual. Reference was also made to project work supporting recognition for displaced persons from Ukraine, coordinated with the support of the Commission and implemented with strong involvement from partners in Italy. This initiative was considered highly influential and effective. Similar sector-specific projects could significantly advance recognition practices, particularly where the Commission provides coordination, financial support and institutional connections.

Question 3: What impact would the introduction of common binding EU rules have for the reduction of heterogeneity and fragmentation of the procedures for the recognition of qualification obtained in third countries

Polls:

Option	Percentage
Very positive impact	0%
Positive impact	75%
No impact	0%
Negative	8%
Very negative impact	0%
I don't know	16%

Respondents: 12

Open discussion:

- **The ENIC NARIC centre from IE mentioned that** binding measures would need to remain sufficiently general and adaptable to national contexts. Member States operate under different legislative frameworks and administrative capacities, and any EU-level rule would need to allow flexibility to accommodate these differences.
- **The ENIC NARIC centre from NL** said that the Lisbon Recognition Convention has been in place for decades, but Member States continue to implement the principles in different ways. Introducing regulations that have to be implemented rapidly across all jurisdictions could clog systems and create disruption at national level. Full harmonisation is the ideal, but immediate implementation could backfire. Even implementation of general

qualifications is carried out differently across countries. Therefore, timing and sequencing of new regulations are critical.

- **The ENIC NARIC centre from IE** noted that the notion of publishing recognition decisions by different jurisdictions in a comparability table may not be totally helpful within narrow practices. In Ireland, comparability statements are based on extensive research, including examination of recognition outcomes in different jurisdictions. Making these public could lead to recognition shopping, where individuals seek better recognition in one country and attempt to transfer it to another. Recognition outcomes depend on context, periods of adaptation, and additional elements in different jurisdictions. Preserving diversity of European systems is essential, and the publication of fully comparable decisions raises some concerns.
- **The ENIC NARIC centre from EL** noted that internal legislation sometimes overlaps with recognition standard procedures from Lisbon, creating potential paradoxes. One individual could face a problem under national law but be compliant with general European recognition standards. This creates two parallel situations where one option aligns with internal law and the other with EU standards. Decisions among parallel systems require careful handling, as specific instances can create challenges beyond general ideals.

Question 4: What level of effort would your institution/organisation need to adopt new EU-level standards and tools for TCN qualification assessment?

Polls:

Option	Percentage
No additional effort	0%
Minor adjustments (weeks)	0%
Moderate adaptation (months of training, system changes)	61%
Significant institutional reform (more than one year)	7%
Not sure	30%

Respondents: 13

Open discussion:

- **The ENIC NARIC centre from NL** specified that the responses provided reflect individual perspectives based on personal experience rather than official institutional positions. For example, he and Evelien are from the same organisation, but they can have different points of view.
- **The ENIC NARIC centre from IE** explained that professional recognition in Ireland - and recognition in general - operates also outside the ENIC-NARIC framework, involving specific communities of practice. These processes are driven by the strategic objectives, requirements, and internal demands of each individual community. Thus, a critical point regards the diversity of scale and the varying capacities of professional bodies to invest in and adapt to recognition standards. Diversity is not merely a procedural detail but the very character of the culture of professional practice in Ireland. Consequently, new measures cannot be successfully introduced by simply delegating implementation to

individual jurisdictions. Effective recognition requires active engagement with each specific community, acknowledging that a "one-size-fits-all" approach fails to account for the inherent differences in scale and purpose across the professional landscape.

- **The ENIC NARIC centre from FI** voted “moderate adaption” because in Finland existing legislation for recognition of qualifications, for both EU nationals and third-country nationals, is pretty clear. New binding EU rules would require revising decision-making processes and possibly amending applicable legislation. For these reasons, the adaptation process would probably be lengthy.
- **The ENIC NARIC centre from NL** replied “not sure” because EU standards could require varying levels of effort depending on recognition type and purpose. The Dutch ENIC-NARIC office mainly issues comparability statements for academic progression and labour market purposes, according to the Lisbon Recognition Convention. The Netherlands hasn't ratified the global Recognition Convention yet, but they're working on it. For this reason, new EU standards are unlikely to require significant institutional reform. However, this assessment does not necessarily apply to the entire Dutch landscape stakeholders. A recommendation was made to involve focus groups with authorities in the fields of professional recognition and regulated professions, as well as those managing foreign VET qualifications. Their perspectives can be essential, as the impact of EU standards on these sectors might differ significantly from the academic and general labour market context.
- **The ENIC NARIC centre from SI** noted that in Slovenia, ENIC-NARIC issues comparability statements and academic recognition at the system level, both for labour market purposes and for continuing education, while competent authorities are the educational institutions themselves. Academic recognition procedures are applied uniformly for EU and non-EU citizens, without differentiation, justifying the vote for "moderate adaptation. Regarding professional qualifications, these fall under the responsibility of national regulatory bodies; for example, in health professions, the Ministry of Health recognises the qualifications. Based on feedback, some parallel procedures, similar to those for EU members, are already being implemented for TCNs within these regulated fields
- **The ENIC NARIC centre from IE** mentioned that IE has an extensive ENIC-NARIC database with downloadable comparability statements covering vocational, professional, and academic qualifications. ‘Professional’ comparability statements have recently been reorganised from a specific professional folder into general, VET, or HE folders. The term “professional” is used differently across jurisdictions in qualification titles.
- **The ENIC NARIC centre from SE** noted that in Sweden, the same methodology has been applied for many years to the recognition of foreign qualifications for both EU and third-country nationals. This internally developed methodology is based on the Lisbon Recognition Convention, primarily resulting in level assessments and comparability statements. For the non-regulated labour market, the recognition process operates within the ENIC-NARIC framework. In contrast, for regulated professions, recognition is conducted through formal agreements with competent authorities, where the ENIC-NARIC office issues statements on their behalf and to support the professional recognition process. There is a clear need for measures that facilitate the recognition of professional qualifications for third-country nationals, as for certain professions no formal recognition processes currently exist. Furthermore, a specific concern regards the lack of pathways to address gaps in qualifications when the original education is deemed

insufficient. In the Swedish context, there are currently limited or no established mechanisms to remedy or bridge these educational gaps, which remains a problematic issue for the integration of third-country professionals.

Question 5: What impact would the introduction of automatic recognition of professional qualifications for TCNs have?

Polls:

Option	Percentage
Very positive impact	0%
Positive impact	66%
No impact	0%
Negative impact	0%
Very negative impact	0%
I don't know	33%

Respondents: 12

Open discussion:

- **The ENIC NARIC centre from IE** noted that implementing recognition systems would require strong communities of practice within the various sectors, which in turn demands funding, organisation, and careful development. This is not something that could happen quickly, as it involves a high level of discourse and coordination. There are jurisdictions, and initiatives by the European Commission - such as with the African Qualifications Network, with India, and so on - from which a significant amount of expertise and trained professionals can be drawn. One could approach this in different ways: starting with the incoming individuals and their qualifications and then building the communities of practice around them or establishing the communities of practice first and assessing their current capacities. In any case, communities of practice formed by professional bodies across the different jurisdictions are essential to ensure that such a system works effectively.

Question 6: For which professions do you think the introduction of automatic recognition or fast-track procedures for the recognition of professional qualifications of TCNs might be needed?

Polls:

Option	Percentage
Doctors	13%
Nurses	27%
Engineers	5%
Architects	2%
Workers in the hospitality industry (e.g. cook, waiters, butchers)	10%

Option	Percentage
Lorry drivers	5%
Carpenters	8%
Electricians	8%
Welders	8%
Crane operators	8%
Others	2%

Respondents: 10

Open discussion:

- **The ENIC NARIC centre from IE** noted that most of the professions listed in the poll are not reflected in Ireland's ENIC-NARIC critical skills list, which is the reason for the selection of the "others" category. This includes, for example, areas such as IT experts and, interestingly, animation. Across different jurisdictions, critical skills lists vary, so the professions considered critical may differ and lead to different responses.

Question 7: What is the main risk if recognition procedures for TCNs are significantly simplified trough automatic recognition/fast-track procedures?

Polls:

Option	Percentage
Reduced assessment quality	11%
Increased fraud risk	66%
Reduced employer trust in recognition decisions	0%
Exclusion of complex cases that need detailed assessment	11%
No significant risk	11%

Respondents: 9

Open discussion:

- **The ENIC NARIC centre from SI** highlighted that no significant risk arises if the implementation and organisation are well-prepared and sufficient capacity is available. A key challenge in these processes is the lack of staff, which creates excessive workloads for public institutions and authorities responsible for recognition. In the public sector - In Slovenia, at least - employment levels are relatively low, so an increased workload without additional staff would be problematic. Increasing the number of credential evaluators, providing training, and ensuring support would mitigate the risk, though this depends on several conditions.

- **The ENIC NARIC centre from IE** highlighted the risk of reduced assessment quality if there is no centralised verification to ensure that credentials are authentic, unaltered, and belong to the individual. Verification should feed back to the recognition body for further decisions. Centralised management of fraud, including cyber fraud, is crucial, as fraud currently represents a significant risk and cost for organisations. Implementing centralised measures, at the Commission level, would improve the overall quality of assessments and support better decision-making.
- **The ENIC NARIC centre from FI** voted for "increased fraud risk", since verifying the completion of qualifications and obtaining the necessary documents for the recognition process often takes a considerable amount of time.

Question 8: If documentation requirements were simplified and digital tools introduced, by how much could your assessment time per application be reduced?

Polls:

Option	Percentage
No reduction	8%
Less than 10%	0%
Between 10% and 25%	8%
More than 25%	0%
Not sure	75%

Respondents: 12

- **The ENIC NARIC centre from NL** asked if this poll refers to any type of digital tools broadly or from a Commission perspective, to better understand the question, since many international digital tools are used to facilitate assessments or information retrieval. It was clarified that the reference is to the use of EU common rules and related tools.
- **The ENIC NARIC centre from IE** noted that simplifying documentation requirements raises concerns due to the capacity for fraud and the need to verify qualifications thoroughly. There are questions about how digital tools would help, depending on which tools are used and for what purposes. It is also important to keep in mind that validation and recognition are not the same, and the desire to simplify processes does not mean they can simply be compressed or treated as equivalent.

Question 9: To what extent common EU rules on the number of documents requested to TCNs can reduce complexity and burden for them to apply?

Polls:

Option	Percentage
To a large extent	0%
To a moderate extent	75%
To a small extent	25%

Option	Percentage
No extent	0%

Respondents: 8

Open discussion:

- **The ENIC NARIC centre from SI** asked clarification on what reducing the number of documents would entail, since it is unclear what could actually be reduced, if anything. In general, in the Slovenian context, not too much documentation is required, although requirements may vary between countries and sectors. However, some minimum documentation is necessary in order to carry out assessments.
- **The ENIC NARIC centre from IE** noted that the focus should not be on specifying the number of documents, but rather on ensuring that the required documentation is appropriate for the purpose of the recognition being sought. Documentation should be "fit for purpose".

Question 10: To what extent do you think EU level measures are needed to provide comprehensive information to TNCs on how access to regulated professions works across the Member States?

Polls:

Option	Percentage
To a large extent	55%
To a moderate extent	33%
To a small extent	0%
No extent	11%

Respondents: 9

Open discussion:

- **The ENIC NARIC centre from IE** mentioned that building a culture of recognition requires extensive engagement and clear information. Unless everyone is aware - employers, communities, and citizens - effective recognition cannot happen. This can only be achieved through clear information campaigns. However, there is a risk that wide information campaigns may lead people to "recognition shopping" and transferring qualifications across the EU. Operating the Qualifications Framework and associated frameworks does not guarantee that every country evaluates qualifications at the same level, and these differences must be addressed. Recognition is a very nuanced and complex area, and progress can only be made through direct engagement and by responding to the needs and questions of people involved.

Question 11: If common EU measures to improve access to relevant information were introduced, by how much could the time required for providing information and support assessments be reduced?

Polls:

Option	Percentage
No reduction	0%
Less than 10%	7%
Between 10% and 25%	20%
More than 25%	15%
Not sure	46%

Respondents: 13

Open discussion:

- **The ENIC NARIC centre from IE** reported that a significant number of queries are litigious, which must be considered when evaluating how much time could be saved. As people become more aware of their rights, their expectations rise, and managing these expectations is essential. Clear information should set out not only general rights but also the specific rights within individual jurisdictions, professional bodies, and recognition authorities, and this must be communicated as clearly as the provision of the service itself. A considerable amount of time is spent explaining situations where individuals expect decisions to go a certain way or at a certain pace. This issue also reflects resourcing, as larger teams might handle this more efficiently, but available resources vary significantly across the EU.

Question 12: How often do you encounter TCN qualifications that you cannot reliably assess with the information currently available to you?

Polls:

Option	Percentage
Rarely (less than 10% of cases)	27%
Occasionally (10–25%)	45%
Frequently (25–50%)	9%
Very frequently (more than 50%)	0%
Not sure	18%

Respondents: 11

Open discussion:

- **The ENIC NARIC centre from FI** noted that the main problem, in cases where TCNs qualifications cannot be reliably assessed, is often the lack of reliable information from national sources. For example, government websites may not function properly to verify the official status of an educational institution or a specific programme.
- **The ENIC NARIC centre from BE** highlighted that sometimes the authenticity of the diploma cannot be verified, which is a critical issue for the ENIC-NARIC, especially regarding regulated health professions.

- **The ENIC NARIC centre from SE** mentioned that old qualifications are particularly challenging to assess.

Question 13: If comprehensive information on key third-country systems were available, by how much could your assessment time be reduced?

Polls:

Option	Percentage
No reduction	18%
Less than 10%	18%
Between 10% and 25%	27%
Very frequently (more than 50%)	9%
Not sure	27%

Respondents: 11

Open discussion:

- **The ENIC NARIC centre from SI** highlighted that ENIC-NARICs are effective at gathering information on education systems and exchanging it through their network. The main challenge lies in the accessibility of transparent information on the authenticity and status of institutions, programmes, and qualifications, as well as in non-functioning websites of competent authorities in some countries, such as Iran, India and others.
- **The ENIC NARIC centre from SE** mentioned that access to information is probably not the biggest issue; the real challenge is verification. Contacts are very useful and important in this process.
- **The ENIC NARIC centre from IE** noted that implementation of the GRC would undoubtedly assist.

Question 14: To what extent EU cooperation with third countries can strengthen understanding and trust on qualification and skills obtained in third countries?

Polls:

Option	Percentage
To a large extent	72%
To a moderate extent	27%
To a small extent	0%
No extent	0%

Respondents: 11

Open discussion:

- The ENIC NARIC centre from IE stressed that EU cooperation includes the case study work carried out by the ENIC-NARIC Network.

Question 15: Without EU-level action, how would recognition outcomes for TCNs evolve in the next 5 years?

Polls:

Option	Percentage
Improve through national reforms	27%
Remain broadly stable	72%
Worsen slightly	0%
Worsen significantly	0%

Respondents: 11

Open discussion:

- **The ENIC NARIC centre from IE** questioned which EU-level actions were being assumed, explaining that the answer was based on the premise that the EU-level actions currently in place, along with the support provided by the EU, would continue. The response clarified that the reference is to "Problem 3" presented in the plenary session, aimed at understanding how to reduce information gaps, simplify procedures, and improve cooperation with third countries. Policy measures are still under analysis, and the focus is on supporting full impact assessments and cost-benefit analyses. Extensive information and data are being collected to enable all necessary analyses up to this point.

8.1.1 Break out room: PES-CSOs

Question 1: To what extent do you provide information and support to TCNs regarding the recognition of professional qualifications?

Response option	Percentage
To a large extent	24%
To a moderate extent	38%
To a small extent	29%
No extent	10%

Respondents: 21

Question 2: To what extent do you provide information and support to TCNs regarding on the validation of skills of TCNs?

Response option	Percentage
To a large extent	15%

Response option	Percentage
To a moderate extent	40%
To a small extent	30%
No extent	15%

Respondents: 20

- **The contractor** highlighted that the results indicate that information and support related to validation of skills appear to be less developed than for recognition of qualifications. I would now like to open the floor. Could you explain what types of support or mechanisms you have in place?
- **The PES from IT** highlighted that in Italy, validation of skills for TCNs is still limited. In our region, we have only had one concrete experience, related to intercultural mediators. Candidates had strong linguistic skills and relevant educational backgrounds, but even in these cases, they were required to provide formal documentation from their country of origin, translated and legalised. This is why I indicated only a small extent in my response
- **A CSO from FR** provides information both on recognition of qualifications and validation of skills, but mostly to a moderate extent. They offer preparatory courses, including language assessment and orientation, to help TCNs understand what is expected in the French labour market. However, recognition of skills acquired abroad remains complex and difficult to operationalise.
- **A CSO from FR** mainly supports refugees, particularly those aiming to work in regulated professions such as healthcare. A major issue is the lack of specific information tailored to refugees, especially when documentation is missing or studies were interrupted. Existing information is often designed for international students, not for people with forced displacement experiences.
- **The PES from LT** mainly provide information. Recognition of regulated professions is handled by an innovation agency. Currently, there are 44 regulated professions, and TCNs can apply for recognition through this body, based on labour market needs identified together with the Ministry of Economy and Innovation.
- **The PES system in FI** is decentralised, with municipalities responsible for service delivery. Practices therefore vary, but most provide online information on recognition of qualifications, and some also offer in-person information points where individuals can receive personalised advice.
- **The Contractor** asked whether CSOs working with refugees observe differences between refugees and other TCNs in terms of access to information and recognition procedures?
- **A CSO** mentioned that refugees face additional barriers linked to forced displacement, such as interrupted studies, long periods of inactivity, and missing documentation. These factors significantly complicate recognition procedures, especially in long and highly regulated professions like medicine. These challenges must be explicitly taken into account when designing recognition systems. The CSO further suggested establishing centralised resource centres where comprehensive information is available, including resources specifically tailored for refugees.

- **The PES from IT** mentioned that one key document for recognition is the "declaration of value," issued by the Italian embassy in the country of origin. Refugees cannot return to their home country to obtain this document. In such cases, the Ministry of Foreign Affairs can intervene and manage the procedure on their behalf, which is essential for enabling access to recognition.

Question 3: What is the most relevant mechanism trough which TCNs receive relevant information?

Mechanism	Percentage
In-person counselling	47%
Institutional website	47%
Digital platform	5%

- **The PES from IT** mentioned that current websites tend to lack user-friendliness and frequently omit essential information.

Question 4: To what extent do you think specific mechanisms such as in-person information provision is beneficial compared to digital information provisions (through website)?

Response option	Percentage
To a large extent	75%
To a limited extent	5%
No extent	0%
Don't know	20%

Olivier Beernaert – CSO BE

- **A CSO from BE** highlighted that language barriers and digital skills are key issues. When procedures are complex, in-person support reassures individuals and helps ensure they are following the correct steps and submitting the right documents
- **A CSO from FR** stressed that personal interaction leaves a stronger and longer-lasting impact than information obtained online. It helps people better understand the process.
- **The PES from IT** mentioned that the majority of recognition activities are conducted through a website, with additional communication occurring via email and telephone.
- **A CSO from FR** stressed that recognition procedures tend to be lengthy. Training is essential, and it is important to ensure that individuals receive personal orientation in order to perform effectively in a specific role.

5. To what extent do you think EU level measures are needed to provide comprehensive information to TNCs on how access to regulated professions works across the Member States?

Response option	*Percentage*
To a large extent	*60%*

Response option	*Percentage*
To a moderate extent	*35%*
To a small extent	*5%*
No extent	*0%*

- **The PES from FI** stressed that sharing information could potentially be linked to existing initiatives such as the EU Talent Pool, to centralise and improve access.
- **The PES from IT** highlighted that unique EU tool for the recognition of qualifications can be useful for the portability of skills across EU countries.
- **A CSO from FR** highlighted the importance that the tool is accessible and easy to use. If the move to the EU is planned, it's useful to compare the process in different countries. Very often you encounter differences in procedures, documentation requirements, and support available, which can make the experience quite confusing.
- **According to the PES from BG,** an EU-level tool should offer different layers of information, depending on whether people are planning to migrate or have already arrived. A guided, possibly AI-supported interface could help users find relevant information more efficiently.
- **The PES from DE** explained that beside the RegProf, they have Anabin, the German national portal. Anabin is a database used in Germany for recognising foreign qualifications, alongside the EU-level Regulated Professions Database, which is connected to the Professional Qualifications Directive and mainly targets new EU citizens. However, TCNs often find these databases do not reflect the realities of national procedures, as the information provided may not align with their actual experiences and requirements at the country level. Anabin is a useful resource for recognising foreign qualifications in Germany, offering updated information provided by professionals. However, its interface is challenging to navigate, particularly for those unfamiliar with its operation, and it is not considered user-friendly. While the database is available in English and contains valuable, current data, evaluations often highlight that it does not fully meet the needs of third country nationals, and improvements are ongoing to make it easier for foreign users to handle. Despite its difficulties, Anabin remains a beneficial tool, even though its effectiveness and usability could be enhanced further.
- **A CSO from FR** mentioned that it is the responsibility of each Member State to update and maintain the database, ensuring the information remains accurate and relevant to national procedures.

6. **If common EU measures to improve access to relevant information would be available, by how much could your work on providing information and support assessment time will be reduced?**

Response option	Percentage
No reduction	0%
Less than 10%	11%

Response option	Percentage
Between 10% and 25%	22%
More than 25%	11%
Not sure	56%

Respondents: 18

- **A CSO from BE** stressed that the individuals we assist are typically those who are unable to complete the process independently, which makes it difficult to provide a definitive assessment.

Question 9: What impact would have the introduction of automatic recognition of professional qualifications of third-country nationals?

Response option	Percentage
Very positive impact	41%
Positive impact	29%
No impact	0%
Negative impact	18%
Very negative impact	0%

- According to **the PES from IT,** automatic recognition could have a negative impact if applied to newcomers without sufficient language skills, particularly in sensitive sectors such as healthcare. Clear conditions would therefore be necessary.
- **A CSO from BE** stressed that the impact is difficult to predict. Automatic systems can be effective when all requirements are met, but they risk excluding individuals if flexibility and human assessment are removed.
- **A CSO from FR mentioned that** faster recognition helps, but other barriers, particularly language, continue to limit integration. Employers must be thoroughly informed about automatic recognition processes to foster confidence in foreign qualifications. Even when competent authorities accept these qualifications, some employers may remain hesitant to recognise diplomas obtained abroad. Addressing this reluctance through clear communication and awareness is essential for effective implementation

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10. For which professions do you think the introduction of automatic recognition or fast-track procedures for the recognition of professional qualifications of TCNs might be needed? (multiple choice)

Profession	Percentage
Doctors	10%
Nurses	17%
Engineers	12%
Architects	8%

Profession	Percentage
Workers in the hospitality industry (e.g. cooks, waiters, butchers)	13%
Lorry drivers	5%
Carpenters	2%
Electricians	10%
Welders	5%
Crane operators	5%
Others	5%
Other	1%

Respondents: 17

- **The PES from IT** explained that in the hospitality sector, usually no formal recognition of qualifications is necessary, at least in Italy. If you want to work as a waiter or as a cook, there is no formal recognition of qualifications required. What matters more is experience or skills rather than formal qualifications.
- **A CSO from FR** stressed that fast-track procedures are essential for all regulated professions, and harmonisation at the European level should draw on successful practices already established in various countries. For instance, in Germany, specialist doctors may obtain recognition of their speciality directly, bypassing the need for initial recognition of their primary medical qualification. These positive examples from across Europe demonstrate the potential for a unified, streamlined system. Effective fast-track recognition also relies on robust cooperation among all stakeholders involved, including education authorities, health authorities, and public employment services. It is vital that each actor's role and responsibilities are clearly defined to ensure the process is efficient and targeted. Therefore, for every regulated profession, there are actionable steps that can be taken to improve and expedite recognition procedures, ultimately supporting better integration into the labour market.

Question 11: Based on your experience, how strong is the link between improved recognition procedures and actual labour market integration of TCNs?

Response option	Percentage
Strong link — recognition is the main barrier	18%
Moderate link — recognition helps but other barriers persist	76%
Weak link — labour market barriers are mostly unrelated to recognition	6%
Varies greatly by profession and Member State	0%

Question 12: What could be the expected impact of a common binding EU framework for the recognition of professional qualifications of third-country nationals?

Response option	Percentage
Very positive impact	88%
No impact	0%
Negative impact	0%
Very negative impact	0%
Don't know	12%

A CSO from FR mentioned that fast recognition is important and can support faster access to the labour market. However, language barriers will still persist even if recognition procedures are improved. Other barriers remain alongside recognition, so automatic recognition or a common framework can speed up access, but it does not remove all obstacles.

- According to **the PES from IT,** having automatic recognition of qualifications gives TCNs the possibility to contribute to the European labour market, especially in relation to labour shortages. In the coming years, Europe will face shortages of qualified workers, partly due to demographic decline. Automatic recognition helps fill these gaps, but it also allows TCNs to be fully involved in European society. When their qualifications are recognised and they can access positions that match their skills, they are better integrated not only into the labour market but also into society more broadly.
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Annex 17.5 Online Focus Group 5 (FG5) on attracting talent and recruitment

Annex 17.5.1 Agenda of the meeting

Time	Agenda item
09:30 – 09:40	**Welcome** • Opening remarks by DG EMPL • Presentation of the objectives of the focus groups and housekeeping rules
09:40 – 10:00	**Introductory session** • Presentation of the study • Recap of problem definition • Presentation of policy objectives and identified POs
10:00 – 10:10	**Q&A**
10:10 – 10:20	**Coffee-break**
10:20 – 12.20	**Focused discussion (in plenary),** interactive discussion with polls questions on: Validation of skills Interactive discussion with polls questions on the impacts of the identified policy options
12:20– 12:30	**Wrap-up and next steps** • Summary of key takeaways by facilitator • Explanation of how the inputs will feed into the study • Closing remarks and thanks

Annex 17.5.2 Introductory session

The Deputy Head of Unit B.5 in DG EMPL opened the meeting by outlining the Skills Portability Initiative, particularly Action 3, as a key priority of the current Commission mandate, situated within the broader framework of the Union of Skills, which aims to ensure that TCNs can fully use their skills and competences when entering the EU Single Market.

Annex 17.5.3 Presentation by the study Team

The Contractor presented the problem tree (presented in Annex 1 of the current document) in all its constituting elements: core problem, its consequences, but most importantly the drivers of the problem and their underlying issues.

The Contractor also briefly presented the objective tree (presented in Annex 2 of the current document), linking the core problem and the three identified drivers to one general and three specific policy objectives. The contractor clarified that the identified drivers and the resulting policy objectives will guide the development of relevant policy measures.

Annex 17.5.4 Q&A

- **A talent partnership stakeholder from DE** asked for clarification on the temporal scope of implementation for PO3, noting that it may require adjustments to training frameworks in countries of origin. **DG EMPL** explained that PO3 on automatic recognition relies on existing EU-level common standards, notably the seven harmonised minimum training requirements (MTRs) covering shortage professions such as nurses, dentists, and architects. These provide an EU benchmark ensuring patient safety. Additional common training frameworks could also be introduced for other professions.
- **An IO** welcomed the problem definition, noting it correctly highlights the need to reduce procedural redundancy and cut costs.
- **An HR representative** also agreed with the identified problems, emphasising the high complexity and fragmentation of the current system. From a business perspective, the critical issue is not only which option is chosen but how *fast* and *usable* it will be in practice. Companies already assess skills themselves because they cannot wait for lengthy procedures.
- **An EU umbrella organisation of employers** underlined that the road transport sector is highly regulated, with EU and national rules accumulating. He asked how EU Member States recognise qualifications of non-EU drivers, given the sector's pressing labour shortages.
- **An IO** expressed support for the POs' focus on streamlining and standardising EU policies. From a country of origin perspective, she referred to the implementation of the THAMM+ project (i.e. a Talent Partnerships project) and asked how the POs, particularly those touching on non-formal/informal learning and prior learning, would impact upskilling processes in countries of origin.
- **The Contractor** clarified that the study focuses primarily on potential EU action on the recognition of formal learning. Validation of non-formal and informal learning is covered by a recommendation and shows significant variation across Member States, often left to employers. Cooperation mechanisms with third countries (TCs) to strengthen understanding of TC qualification frameworks are embedded across all three POs, with measures foreseen to improve such collaboration.

- **DG EMPL** added that non-formal and informal learning will still feature in the initiative. While not as central as elements such as automatic recognition or high training standards, they remain important in addressing skills gaps, which can often be filled through informal and non-formal learning pathways.

Annex 17.5.5 Interactive session

Following the introductory session, the meeting moved into a plenary interactive segment aimed at gathering participants' views on the Policy Options being examined in the feasibility study. This part was structured around a series of poll questions, intended to capture attendees' first impressions. Each poll was followed by an open discussion to explore the results more thoroughly, giving participants the opportunity to raise further points, share relevant practices and experiences, and reflect on the implications of the potential interventions under consideration. Additional comments were also gathered via the chat.

Question 1: In your experience, which of the following challenges do TCNs face in the recognition of their qualifications and validation of skills?

Polls:

Option	Percentage
Lack of clear and accessible information	8%
Complex and burdensome procedures	12%
Long and untransparent procedures	4%
Other	77%

Respondents: 26

Open discussion:

- **A Talent partnership stakeholder from IT** manages a project on skill migration between Pakistan and Italy funded by the ICMPD; therefore, it has experience in the validating professional competencies. In Italy, skills recognition is regulated at regional level, as a prerogative of regional governments. To have a qualification recognised, training must be carried out in Italy through an accredited agency, and an examination must be passed before a regional commission. This makes the automatic recognition of qualifications and competences acquired abroad very difficult, if not impossible, and represents a first major procedural limitation. A comparison exercise between Italian and Pakistani curricula and standards shows that they are very similar. The curricula are almost the same, with only some gaps to be filled, particularly in professions such as welding and other non-regulated occupations. Despite this similarity, procedural requirements in Italy remain a key obstacle. A further issue concerns the lack of homogeneous standards. Since qualifications are regulated at regional level, there are around 20 different systems, which are very similar but not exactly the same. The definition of qualifications therefore varies across regions. Work is ongoing at national level to harmonise these standards, but a single unified standard is not yet in place. A similar situation exists in Germany, where systems are also decentralised at regional level. For these reasons, there is a need to develop common standards at European level to be proposed to third countries, in order to support the upgrading of their curricula, despite acknowledging this would be a complex and long-term process. A distinction is also made between trust from private companies and formal recognition by public authorities. Through curriculum comparison and analysis of training quality, it is possible

to provide some level of assurance to companies that qualifications obtained abroad are equivalent to those provided in Italy. However, recognition by private companies is not equivalent to official recognition by government authorities. Formal recognition remains essential for proper integration into the local labour market. From a trade union perspective, particular attention is paid to ensuring that workers are employed with contracts that reflect their actual qualifications, in order to avoid both under-qualification and overqualification.

- **An HR representative** highlighted that in Romania, the recognition of qualifications is managed exclusively by the Ministry of Education, who is in charge to evaluate any certificates or diploma from other countries, both for EU and non-EU citizens. The process focuses on formal education and requires individuals to collect and submit official documentation from their country of origin. This can be a barrier, as some individuals do not have immediate access to these documents and must apply for them, depending on which country they are coming from. Once documentation is submitted, the Ministry evaluates the institution and level of education completed and establishes equivalence within the Romanian system (e.g. gymnasium, high school, university). This process, however, does not assess competences. As a result, employers are responsible for internally evaluating whether the individual possesses the required skills. No other institutions are authorised to carry out this evaluation. Informal and non-formal learning are generally not taken into consideration in the recognition process, which limits the validation of competences acquired outside education systems.
- **An IO** mentioned that Bangladesh has initiated a talent partnership project with the European Union, starting in late 2024 and becoming operational on the ground from August 2025. The project includes skills needs analysis and assessment conducted with EU destination countries, particularly Italy and Germany, focusing on sectors such as transport and logistics, tourism, hospitality, construction, shipbuilding, ready-made garments (RMG), and healthcare. The national system in Bangladesh involves two authorities: the Bangladesh Technical Education Board and, more recently, the National Skills Development Authority, which regulate skills standards across the country. Thus, there are some differences within the country itself. In consultation with the EU and the Italian embassy, a gap analysis has been conducted between the Bangladesh National Qualifications Framework (BNQF) and the European Qualifications Framework (EQF). Based on this analysis, work is ongoing to reduce the gap and align Bangladeshi qualifications with European standards, particularly with reference to EQF. In addition to technical skills, language barriers represent a major difficulty for Bangladeshi workers in EU destination countries. For this reason, Italian language training programmes have been introduced alongside skills development programmes, particularly following interest from Italian employers in recruiting skilled workers from Bangladesh. Training is currently delivered in Bangladesh. At the initial stage, there were no ready-made standards or institutions fully able to meet Italian labour market requirements. For this reason, initial discussions were held with the European Union and the Italian Embassy. The approach adopted consists in first developing national standards in Bangladesh and, subsequently, addressing any remaining gaps with support from the Italian side, including employers.
- The **Contractor** requested further details regarding existing bilateral initiatives between Italy and Pakistan, specifically concerning their nature, scope, and objectives. It was noted that such evidence is essential for the development of strengthened cooperation mechanisms between Member States and third countries. Furthermore, the **Contractor**

invited a participant to share additional experiences of cooperation with European countries and sought an assessment on whether further efforts in this field are required.

- **A talent partnership stakeholder from IT** mentioned that migration law includes a quota system ("Flows Decree") but also provides for the possibility of recruiting workers outside the quota system (Art. 23, Legislative Decree No. 286/1998). This applies where vocational training, additional or upgrading training, Italian language training (minimum level A1), and health and safety training are provided, and where there is a job offer. Italian language training is therefore compulsory in this framework, but the level required is basic. Within the project with Pakistan, national research on labour market shortages was first conducted, followed by a second phase at regional level to identify priority sectors and specific qualifications. Then, a second research phase concerning labour market shortages was conducted, leading to the identification of four priority sectors. Within these sectors, specific qualifications were subsequently selected and analysed through comparison of curricula with Pakistani public vocational training institutions at federal level. The comparison also included training processes, in order to ensure that competences are equivalent, not only in terms of content but also in terms of delivery. The final output of the project was the development of a framework for a talent partnership between Italy and Pakistan, outlining how cooperation and mobility schemes could be structured. A next phase is currently being prepared, with the aim of testing worker mobility in practice. However, the recognition of qualifications remains a central unresolved issue. An additional instrument is represented by prior learning certification. In the Piedmont region, following a trial period, a large programme has been introduced to certify competences acquired through work experience rather than formal education. This could provide a pathway for workers whose qualifications obtained abroad cannot be formally recognised immediately, allowing them to enter a certification process in Italy.
- **An IO** explained that an Italian language programme is implemented in Bangladesh at levels A1 and A2, but some challenges are highlighted, particularly in relation to employer engagement. Reference is also made to the presence of irregular migration in Italy as part of the broader context affecting these dynamics. Ongoing work is taking place in this area, including meetings with Italian agencies, aimed at identifying employers willing to collaborate with the Bangladeshi skilled migration project.

Question 2: To what extent do difficulties with recognition of qualifications affect recruitment of TCNs in your sector?

Polls:

Option	Percentage
Not at all	0%
To a limited extent	8%
To a moderate extent	54%
To a large extent	38%

Respondents: 24

Open discussion:

- **An HR department** mentioned that the extent to which recognition difficulties affect recruitment depends on the type of profile considered. In sectors such as healthcare, the impact is significant, whereas for more technical profiles the effect is more limited.

Experience is reported with Article 23 procedures, including direct recruitment activities carried out in third countries. The recruitment process involves travelling to third countries, meeting candidates in person, and assessing both technical and soft skills. In this context, qualifications are not always a determining factor in the selection process, and in many cases they have a limited impact compared to skills. Indeed, greater importance is attributed to understanding candidates' competences and the educational systems of their countries of origin. However, interpreting and comparing these frameworks remains difficult, as illustrated by the case of Ghana, where deciphering specific educational pathways and levels proved challenging. This applies not only to formal qualifications but also to reconstructing the broader learning trajectory of candidates. A need emerges for clearer and more accessible information on third-country education systems. Existing tools, such as ESCO or similar systems, can be too technical, particularly for HR professionals involved in recruitment processes. More practical and user-friendly tools are suggested to support effective selection. In response to the contractor's request of clarification regarding the operational process during missions to third countries, she explained that recruitment is conducted in cooperation with certified local partners who support pre-selection activities. Allowing this phase, recruiters travel to meet candidates and initiate a comprehensive pathway that includes initial preparation in the country of origin - specifically language instruction (minimum A1) - followed by further development upon arrival in Italy. If necessary, additional technical and linguistic modules are provided once the workers are on-site. A fundamental requirement is the prior engagement of Italian companies before commencing any search abroad. This model demands seamless coordination between all stakeholders, including local partners, candidates, and particularly the employers in Italy. Direct presence in third countries is considered essential for evaluating not only formal qualifications but also practical skills, soft skills, cultural nuances, and linguistic abilities. Since language is a critical success factor, relying solely on widely spoken tongues like English or French is often insufficient; therefore, instructional programmes must ensure adequate preparation tailored specifically to the destination context.

- **An IO** mentioned that governance arrangements are also a key factor in the recognition of qualifications and, consequently, recruitment. From the ILO perspective, there is a lack of coordination observed among institutions and stakeholders, particularly in relation to regulated professions, which are more affected by recognition barriers. The healthcare sector is a clear example, which is also strongly affected by migration dynamics. There is a need to strengthen tripartite arrangements and enhance the role of sector skills councils, as well as to ensure better coordination with sectoral regulations. This applies both to countries of origin and destination. This whole process should be supported by labour market intelligence, in order to clarify where labour demand exists, in which sectors, and under which conditions. This is considered essential to support more effective recruitment processes and better alignment between skills supply and demand.
- Drawing on her experience with a private company in Romania, an **HR department** representative noted that the recruitment of TCNs is a frequent occurrence, primarily involving candidates from Nepal, Thailand, India, and Sri Lanka. Hiring channels include direct recommendations, often through family members already employed, and recruitment through agencies providing temporary workers. In some cases, workers remain formally employed by temporary work agencies rather than directly by the company. National regulations impose annual limits on the number of foreign workers, which may vary depending on government decisions. Romanian language is not considered a major barrier in this context, as communication is facilitated through English

or internal translators, given the presence of almost 400 foreign workers within the company. Recognition of qualifications has limited impact for low-skilled positions, such as production operators, where recruitment is relatively straightforward. However, for more qualified positions, recognition becomes a significant challenge. An example is provided in relation to forklift drivers. Although this is a relatively technical occupation, qualifications are not standardised or mutually recognised across countries, including within the European Union. Cases are reported where Romanian workers trained in Italy or the UK are not recognised upon returning to Romania and are required to repeat the qualification process. This results in additional time and costs. Language becomes relevant in cases where workers pursue formal qualifications in Romania, as examinations must be taken in Romanian, despite just at a basic understandable level. The role of NGOs and public institutions is crucial in providing cultural orientation and integration support, as understanding the cultural background and local habits is central when moving from one country to another. Various programmes exist offering information on language, culture, and daily life. Some regions provide well-developed training centres with teachers and structured programmes, although availability is uneven across the country and depends on the level of engagement of local authorities. The local context plays a vital role, particularly in smaller areas where the arrival of a large number of foreign workers can significantly affect local communities. Cooperation with local authorities is therefore necessary to manage integration processes effectively.

- Drawing on experience of the THAMM Plus project, **an IO** noted that sector skills councils are key mechanisms - bringing together employers, training institutions, and public authorities - in defining location standard competencies that are organised by the labour market. Activities are now underway in Egypt, particularly in the tourism sector, to integrate international employment considerations into sectoral skills councils. he objective is to ensure that training systems respond not only to national labour market needs but also to international demand, particularly in Europe. This approach aims to support the identification of priority occupations and to align training standards with international frameworks, including ESCO. Such alignment is expected to facilitate the recognition and portability of skills for workers seeking employment abroad. While the focus is on the European labour market, potential benefits are also identified for employment opportunities in Gulf countries, where similar alignment processes are emerging.
- According to **an HR department representative,** recognition of qualifications creates significant challenges in the transport sector, particularly in relation to Certificates of Professional Competence (CPC) and driving licences. There is a shortage of drivers, especially for heavy vehicles requiring higher levels of training. Recognition of qualifications obtained in third countries is limited, and this restricts the ability to fill labour shortages. Challenges also exist within the European Union due to incomplete mutual recognition between Member States. Moreover, a specific issue concerns the recognition of the date of issuance of driving licences. In the context of DHL progressive transition to electric delivery vehicles, which are heavier and require specific conditions to be driven with a standard licence, drivers must have held their licence for at least two years. When TCNs exchange their licences for EU licences, the recognised date is often the date of exchange rather than the original date of issuance. As a result, drivers are considered to have no experience and are not eligible to operate these vehicles. This creates a significant barrier to recruitment and limits the ability to support the transition to electric fleets. Recognition of the original date of issuance is identified as a relatively simple solution that could address both labour shortages and sustainability objective.

- Beyond procedural aspects and language training, broader integration measures are also essential as stressed by **an IO**. These include career guidance, mentoring, and other support mechanisms that facilitate long-term integration into the labour market. The focus should not be limited to immediate job placement but should also consider medium- and long-term career prospects for individuals. Labour market intelligence plays a key role in shaping realistic expectations among workers regarding employment opportunities and career pathways and clear information is needed on the value and validity of qualifications and their recognition across different countries, including within the European Union. Bridging training is also identified as an important step to address skills gaps and enable access to sustainable employment pathways.

Question 3: How often do recognition procedures delay hiring of qualified third-country professionals?

Polls:

Option	Percentage
Rarely (less than 10% of cases)	0%
Occasionally (10–25%)	11%
Frequently (25–50%)	74%
Very frequently (more than 50%)	16%

Respondents: 19

Question 4: Which obstacle creates the greatest difficulty for employers when hiring third-country professionals, or matching candidates in Talent Partnerships?

Polls:

Option	Percentage
Lack clarity on the comparability of qualifications	22%
Length of procedures	39%
Documentation requirements	0%
Uncertainty about recognition outcome	9%
Differences in procedures across Member States	4%
Lack of clear information on the applicable procedures	9%
Difficulty understanding skills (when formal recognition is not required)	17%

Respondents: 23

Open discussion:

- **According to an IO,** in the Italian context, Article 23 is considered an innovative instrument that facilitates the hiring of TCNs to address labour shortages, and IOM is very supportive of this. However, feedback from companies highlights some operational challenges, particularly related to the “nulla osta” process. The administrative procedure requires employers to submit documentation through a digital platform once a candidate has been identified and hired. This process is described as difficult to navigate, with practical issues such as platform malfunctions and limited usability. As a result, companies often require significant support to complete the procedure, including direct assistance from implementing partners throughout the process. An additional requirement concerns the obligation for employers to ensure accommodation for migrant

workers. This must be formally validated at regional or prefecture level. While this requirement is important for the protection of workers' rights and for the management of regular migration, it creates additional administrative burdens for employers, particularly in cases where companies need to recruit workers quickly, for example in the construction sector. The experience refers in particular to mobility corridors between Tunisia and Italy in the construction sector, and between Morocco and Italy in the mechatronics sector. In these cases, challenges are less related to skills recognition, as governance mechanisms, curriculum alignment, and joint training development have already been addressed through cooperation between Italian and partner country institutions. The main difficulties arise at the administrative level, particularly in relation to procedural requirements.

- **A talent partnership stakeholder from IT** stressed that the challenges described are linked to the broader issue of building an effective ecosystem to support labour mobility from third countries. The responsibility placed on employers, for example in relation to providing accommodation, could be partially addressed through stronger involvement of public institutions and housing policies at national, regional, or local level. Language requirements also present limitations: the minimum level required (A1) may be sufficient for low-skilled work, but it does not guarantee adequate understanding of workplace requirements, including health and safety measures. This raises concerns regarding both worker protection and effective integration in the workplace. Drawing on previous experiences, cooperation with public institutions in third countries (i.e. Egypt) is considered essential in order to strengthen training systems and align curricula with European standards. This would facilitate both access to local labour markets and international mobility, and in some cases could support more automatic forms of recognition. Another issue concerns access to training pathways, which often depend on prior educational qualifications. Recognition of diplomas and prior education is therefore crucial not only for labour market access but also for entry into further training processes. A further issue concerns international certification of qualifications, which are considered difficult to find when provided by EU Member States to institutions in third countries. In contrast, international certifications are more frequently found non-EU countries, such as the United Kingdom or Switzerland. In some professions, such as engineering or architecture, international bodies may exist that recognise diplomas. The development of this aspect is identified as a potential step forward to be addressed within the broader discussion.
- **According to an IO**, particular attention is given to the integration of occupational safety and health (OSH) components into training curricula. While technical skills are often prioritised, training on workplace safety is not always sufficiently addressed. In the construction sector, efforts are being made to align training with international standards in occupational safety and health, particularly for workers moving from Tunisia to Italy. The objective is not limited to preparing workers for mobility, but also to integrate these modules into national training systems, ensuring that they benefit both the domestic labour market and workers seeking employment abroad. This approach responds directly to concerns expressed by employers, for whom insufficient training in health and safety represents a significant risk. The issue is linked to worker protection, workplace safety, and potential liabilities for employers in the event of accidents. The integration of these modules into training curricula is therefore considered a key step in improving both employability and working conditions.

Question 5: How much could improved recognition procedures reduce the time needed to recruit third-country professionals?

Polls:

Option	Percentage
No reduction	0%
Up to 10%	5%
10-25%	55%
More than 25%	40%

Respondents: 20

Open discussion:

- **An IO** voted “more than 25%”. Improved recognition procedures in countries of origin are linked not only to a significant reduction in recruitment time, but also to the broader issue of procedural length. Strengthening recognition readiness in third countries of origin, in cooperation with governments and public institutions, reduces the need for repeated exchanges between employers and authorities to validate documentation, language skills, and other requirements. Work is ongoing in Tunisia in collaboration with the national employment agency (ANETI) to update the national competency reference framework. This activity is complemented by collaboration with ILO, with the objective of aligning the framework with ESCO. If alignment between national frameworks and European standards is achieved, recruitment procedures for TCNscould become significantly more efficient. The availability of updated and trusted qualification frameworks at national level, combined with alignment to ESCO, would facilitate hiring processes for EU Member States, particularly in the case of Tunisia. This approach is described as still at a preliminary stage, but with the potential to serve as a model that could be replicated in other contexts within the framework of THAMM Plus.

Question 6: In your sector, are there specific professions experiencing shortages where recognition barriers for third country professionals represent a significant bottleneck to recruitment?

Polls:

Option	Percentage
No – shortage pressures in my sector are not linked to recognition barrier	5%
Yes – to a limited extent	19%
Yes – to a moderate extent	67%
Not applicable / no shortages in my sector	10%

Respondents: 21

Question 7: Would automatic recognition of some third-country qualifications facilitate recruitment in your sector?

Polls:

Option	Percentage
Not feasible	9%
Feasible for limited professions	23%

Option	Percentage
Feasible with safeguards (tests/adaptation)	59%
Broadly feasible	9%

Respondents: 22

Open discussion:

- **An HR department representative** highlighted that two sectors are identified as particularly relevant, namely healthcare and drivers. In the case of drivers, demand is very high and challenges are linked in particular to differences in rules across EU countries, especially regarding the recognition of driving licences. Harmonising the recognition of third country driving licences at EU level could be as a significant step forward. In the healthcare sector, programmes exist under Article 27, which applies to highly qualified professions and is similar in structure to Article 23. However, difficulties arise in the translation of qualifications, since the issue is not limited to recognition itself but concerns the requirement for official translations of diplomas and titles. This process is time-consuming and costly and can discourage candidates from proceeding. Thus, these two sectors are identified as areas where automatic recognition could realistically provide benefits.
- The case of commercial drivers brought up by an **EU umbrella organisation of employers** confirms the relevance of these challenges. Existing recognition elements and frameworks are already in place, particularly in the context of international and cross-border transport. Commercial road transport operates by nature across borders, and systems such as the ECMT framework (within the OECD context) already recognise professional qualifications and provide benchmarking mechanisms. However, these frameworks are not applied when it comes to driver mobility within the EU labour market. Drivers from third countries may be authorised to drive internationally and operate within EU territory but cannot be employed in the EU without repeating the full CPC. This issue has been known for several years. Training programmes in third countries often mirror EU requirements and could be further adapted and aligned. While maintaining quality standards is essential, there is scope to facilitate recognition. Commercial drivers are also required to renew their qualifications periodically (every five years), which provides an additional safeguard. A possible approach would be to facilitate recognition of CPC qualifications from non-EU countries, combined with threshold requirements and qualification checks to ensure that drivers possess the necessary knowledge and skills to operate within the EU.

Question 8: Which possible EU measure would most improve recruitment/matching of qualified third country professionals?

Polls:

Option	Percentage
Better information on third-country qualifications	4%
Digital verification of credentials	18%
Standardised recognition procedures	23%
Cooperation with third-country education and training institutions	41%

Option	Percentage
Tools to assess skills and experience	14%

Respondents: 22

Open discussion:

- In the hospitality sector, exchanges with TVET centres and the private sector highlight the importance of seasonality and circularity of workers according to **an IO**. Cooperation between education and training institutions in third countries and in the EU is identified as a way to facilitate this circularity of skills. From the perspective of private sector actors, particularly in North African countries, such cooperation allows workers or trainees to acquire skills in Europe and subsequently return to their countries of origin. This contributes to a form of skills circulation that benefits both labour markets. In sectors characterised by seasonal demand, cooperation between training institutions is seen as a mechanism to support structured and repeated mobility, enabling workers to move between countries while maintaining links with their domestic labour markets. This approach is particularly relevant in sectors that are important both for European economies and for countries of origin, and it could be a way to facilitate and institutionalise forms of circular skilled mobility.
- **A talent partnership stakeholder from DE** stressed that cooperation with third-country education and training institutions is supported, but greater emphasis should be placed on the need for better information on third-country qualifications. Although this option received limited support in the poll, it is considered a critical issue. The German recognition system is strongly based on the principle of material equivalence, which requires detailed and substantive information on foreign qualifications, including curricula and training programmes. In practice, obtaining such information is often difficult, and in some cases impossible, particularly for individual applicants. When this information is missing, recognition procedures cannot proceed. Tools such as ESCO may improve transparency and comparability of qualifications to a certain extent, but they cannot replace formal recognition processes. Transparency tools are useful, but full recognition requires more detailed and structured information. Even in the context of increased cooperation and alignment of standards, there remains a need for institutionalised mechanisms to ensure transparency of qualifications. This is relevant both for individual applicants and for employers. Therefore, in the longer term, further development of structured mechanisms to provide reliable and detailed information on qualifications is identified as necessary. There is also a need to encourage countries of origin to provide more accessible and complete information on curricula and training systems, as this remains a key barrier in recognition processes.

Question 9: To what extent is EU-level action needed to improve recognition of third-country qualifications compared to national initiatives?

Polls:

Option	Percentage
To a large extent	43%
To a moderate extent	48%
To a small extent	10%

Option	Percentage
Not at all	0%

Respondents: 21

Open discussion:

- **A talent partnership stakeholder from DE** voted “to a small extent”. In the German context, recent legislative developments have significantly expanded the possibilities for immigration and for the recognition and validation of skills. Since 2012, Germany has already had procedures for the recognition of third-country qualifications, and since 2024 the framework for skilled migration has been further liberalised. For non-regulated occupations, recognition is no longer required, and employers are given greater responsibility in assessing candidates. A legal framework for validation of skills has also been introduced. As a result, a wide range of legal pathways is available for TCNs to access the German labour market based on qualifications and skills. In this context, there is no strong perceived need to further expand the legal framework at EU level in relation to recognition or migration. Greater emphasis is placed instead on practical mechanisms that can support the implementation of the existing legal infrastructure. The concept of automatic recognition is considered relevant, but mainly in relation to regulated professions under the Professional Qualifications Directive. For non-regulated occupations, the priority lies in improving practical tools and mechanisms that facilitate the functioning of current systems.
- **An HR Department representative** mentioned that a possible EU-level action concerns the mapping of trusted training institutions in third countries. The creation of a reference database of recognised and reliable training providers is identified as a practical tool that could support recruitment processes. Such a database would allow employers to directly identify and engage with verified institutions, reducing uncertainty and improving efficiency. The introduction of minimum or standard requirements for these institutions is also suggested. This type of tool is considered useful across different professional profiles, particularly from the perspective of private sector actors.
- The development of a centralised network or reference point is considered beneficial according to an **HR department** representative. Having access to an official and validated source of information on institutions would provide practical support and add value for employers. Such a resource could also support countries where systems are less structured, by providing guidance and a form of standardisation. EU-level involvement could play a role in offering a model or framework that can be adopted where needed. This approach is seen as a form of support or mentorship mechanism, particularly in contexts where institutional capacities are less developed.

Question 10: If no EU action were taken, how would attraction and recruitment of third country nationals in your sector evolve over the next five years?

Polls:

Option	Percentage
Improve	0%
Remain stable	47%

Option	Percentage
Worsen slightly	37%
Worsen significantly	16%

Respondents: 19

Open discussion:

- A significant worsening is expected in the transport sector, as stressed by an **EU umbrella organisation of employers.** The current shortage of drivers in the EU is estimated at around half a million, and demographic trends are unfavourable, with an ageing workforce and difficulties in attracting new entrants. Entry barriers are linked in particular to age requirements associated with driving licences and the acquisition of CPCs. Strong and persistent demand for transport and mobility services continues to increase pressure on the sector. At the same time, driver mobility already exists, with approximately 6% of drivers in the EU coming from non-EU countries. However, differences in national rules across Member States create uneven conditions for access to the labour market: it is easier to enter some countries than others, due to variations in technical requirements, duration of procedures, and associated costs. These differences generate additional pressure across the EU system. Moreover, the sector is predominantly operated by private actors, with more limited involvement from the public sector compared to other industries. This reduces the availability of coordinated support mechanisms to address recruitment challenges. There is a need for a level playing field at EU level and for rapid action since, without improvements, the situation is expected to deteriorate further. The issue extends beyond the transport sector and affects the functioning of the wider economy, as the movement of goods, access to workplaces, and supply of essential services depend on the availability of drivers. Addressing these challenges through isolated national measures is considered insufficient, and coordinated action at EU level is identified as necessary.

Annex 17.5.6 Extra polls: focus on the validation of skills

Before concluding the focus group, two additional polls were administered in plenary, maintaining the interactive format adopted throughout the previous session. The questions were designed to delve deeper into specific aspects of qualification recognition and the recruitment of third-country nationals, particularly in response to a gap in validation schemes and frameworks emerging from the study, which appears to fall largely on employers. Each poll was followed by an open discussion, allowing participants to share their firsthand experience and ideas on the topic.

Question 11: Does your organisation carry out validation of skills?

Option	Percentage
Yes	33%
No	67%

Respondents: 12

- **A talent partnership stakeholder from IT** stressed that building on the findings on the previous poll question, it is evident that the role of validation of competencies is considered central, particularly in the absence of standardised EU-level approaches to recognition of qualifications and skills. While the private sector plays an important role in hiring workers, the lack of recognised competencies may lead to under-qualification and to situations where workers do not have full rights in the workplace. Recognition of competencies is therefore considered important both to facilitate hiring processes and to ensure better conditions at societal level. It allows providing guarantees to the private sector regarding the quality and level of workers' competencies. This does not exclude that companies may recognise skills, but formal recognition mechanisms would strengthen the process. In particular, reference is made to a measure introduced in the Piedmont region, initially designed to support people - particularly middle-aged individuals - leaving the labour market due to a lack of recognised competencies. This process also applies to individuals entering the labour market, including refugees and migrants, who often do not have official documents demonstrating their experience, qualifications or competencies, or whose documents are not recognised in Italy or in other European countries. The validation process is individual and involves the support of a mentor, who accompanies the person in identifying and documenting their experiences and competencies, including the preparation of a curriculum. This is followed by practical assessments and, where necessary, complementary vocational training provided by accredited regional agencies. The process takes approximately 80 hours and concludes with a final examination leading to the formal validation of competencies. It is not considered particularly costly. Initially introduced around ten years ago, it has now become an established programme supported by regional funding and implemented at provincial level, with the aim of reaching people across the territory. The importance of EU action is emphasised in promoting these processes, in order to harmonise standards and provide common reference frameworks to third countries. Regarding cooperation with training institutions abroad, this is considered important, but priority is given to working with public institutions responsible for regulating qualifications and vocational training systems. The objective is to support alignment with European standards at systemic level. Therefore, the focus should be on broader structural changes, aimed at aligning systems and creating common standards that can support both local labour markets and international mobility. Finally, it is noted that, although differences exist across regions in Italy depending on specific qualifications, systems are largely similar. A process is currently underway to harmonise regional systems with the national framework, including the "Atlas of Professions", and to align them with ESCO. This process is ongoing and reflects a broader effort to establish common standards at national and European level.

Question 12: If yes, which formats are used to validate third country nationals' skills/competences in your context? (Select all that apply)

Option	Percentage
In-person assessment in the third country (pre-arrival)	50% (2)
Recorded assessment (video) reviewed later (pre-arrival)	0% (0)
Live-streamed assessment to EU actors (pre-arrival)	0% (0)
Video-call assessment (pre- or post-arrival)	0% (0)
In-person assessment in the EU after arrival	25% (1)

Option	Percentage
Other (please specify)	25% (1)

Respondents: 4

- According to **an HR department representative**, skills assessments are usually conducted across three main categories: technical skills, software-related skills, and soft or leadership skills, reflecting the types of jobs available. These skills are sometimes assessed internally by employees authorised as skills validators, following official training on assessment methods. Internal assessments are designed specifically for the organisation's personnel, while external assessments are conducted through assessment centres or other providers. Methods include assessment centres, written tests, practical tests, and interviews. Therefore, skills are validated through multiple actions, not only a single test, with the interview or dialogue being an integral part of the validation process. Assessments are carried out periodically, for example every two years, rather than continuously. Rapid changes in the work environment can make certain skills no longer relevant or needed, which requires updating and reviewing skills assessment practices. Assessment results provide not only validation of current skills but also a prediction of future workforce skill needs and inform potential upskilling programmes. A trend has been observed among workers aged 43 - 44, where individuals begin to pursue career changes and learn new skills spontaneously to prepare for future opportunities and remain relevant in the labour market.
- **an HR department representative** mentioned that in the context of international recruitment, the process sometimes begins with online preselection, followed by physical meetings with candidates. Evaluation techniques include understanding language skills, technical and practical competencies, and educational background. Written and oral tests are prepared to assess the candidate's proficiency in vehicular languages such as French or English, which is essential for subsequent training, like A1 Italian language courses. Without this prior language preparation, significant gaps may occur during training. For technical and practical skills, the candidate's previous education and qualifications, such as forklift certification, are considered. Cultural aspects are also important, including experience in multicultural environments and prior travel. Personal skills are assessed alongside technical skills to understand the candidate's suitability for the company and ability to integrate into diverse work settings.
- The **contractor** asked participants for their viewpoints and recommendations on improving the validation of skills, specifically how to ensure that all skills and prior learning of TCNs are considered during recruitment.
- **A talent partnership stakeholder from AT** proposed the creation of a central EU database listing schools and training facilities pre-approved by the European Union or a specific authority, noting that while certain countries, such as Germany, maintain national databases, Austria currently lacks a similar resource. A centralised database could facilitate verification of candidate skills and streamline recognition processes across countries.
- **an HR department representative** expressed support for the idea of developing a centralised database of skills and qualifications. Most individuals already hold diplomas or certifications that include a set of recognised competencies, which could be extracted and systematically integrated into such a database. Such a platform could enable individuals to create personal profiles where their education and skills are recorded and

validated on the basis of existing certifications. This would make the information more accessible to employers, organisations and institutions, and could serve as a single recruitment profile combining both educational background and competencies.

Annex 17.5.7 Closing remarks

The **Contractor** thanked participants for their attendance and provided an overview of the ongoing activities in the context of the Study under Action 3.

Annex 17.6 Online Focus Group 6 (FG6) with TCNs

Annex 17.6.1 Agenda of the meeting

Time	Agenda item
09:30 – 09:40	**Welcome** • **Opening remarks by DG EMPL** • **Presentation of the objectives of the focus groups and housekeeping rules**
09:40 – 10:00	**Introductory session** • **Presentation of the study** • **Recap of problem definition** • **Presentation of policy objectives and identified POs**
10:00 – 10:10	**Q&A**
10:10 – 10:20	**Coffee-break**
10:20 – 10:50	**Focused discussion (in plenary)** • **Interactive discussion with polls questions on skills validation**
10:50-12:20	**Focused discussion (in plenary)** • **Interactive discussion with polls questions on the impacts of the identified policy options**
12:20– 12:30	**Wrap-up and next steps** • **Summary of key takeaways by facilitator** • **Explanation of how the inputs will feed into the study** • **Closing remarks and thanks**

Annex 17.6.2 Introductory session

The Deputy Head of Unit B.5 in DG EMPL opened the meeting by outlining the Skills Portability Initiative, particularly Action 3, as a key priority of the current Commission mandate, situated within the broader framework of the Union of Skills, which aims to ensure that TCNs can fully use their skills and competences when entering the EU Single Market.

Annex 17.6.3 Presentation by the study Team

The Contractor presented the problem tree (presented in Annex 1 of the current document) in all its constituting elements: core problem, its consequences, but most importantly the drivers of the problem and their underlying issues.

The Contractor also briefly presented the objective tree (presented in Annex 2 of the current document), linking the core problem and the three identified drivers to one general and three specific policy objectives. The contractor clarified that the identified drivers and the resulting policy objectives will guide the development of relevant policy measures.

Annex 17.6.4 Q&A

- **Representative working with migrant women in Malta** highlighted that many migrants from conflict zones lack original documentation, making documentation requirements extremely difficult or impossible to meet. Procedures for the recognition of qualifications are unclear, leading to uncertainty and delays. As a result, many individuals face overqualification and are unable to have their qualifications recognised. There is also a lack of accessible data on which university diplomas can be recognised in Europe. Even where certificates are recognised, the process is lengthy due to the need to collect information, obtain certified translations, and validate certificates. The interlocutor further stressed that technical education and related occupations require more practical, rather than purely academic, recognition approaches.
- **A community leader and organiser from Côte d'Ivoire**, currently in Greece stated that EU projects on qualifications largely remain "on paper" and are not known among TCN communities. There is a significant lack of information, and while communities are frequently contacted by TCNs seeking guidance, there is no practical implementation on the ground. He suggested that awareness and implementation could be improved through greater involvement of CSOs and stronger links with diaspora communities.
- **A TCN** noted that many doctors are unable to have their qualifications and certificates recognised and therefore end up working in low-skilled sectors such as storage and logistics. He stressed the absence of dedicated pathways for the recognition of highly qualified migrants and explained that migrants are often required to arrive in the EU and then begin the recognition process. He also observed that the recognition process in Romania appears to be easier compared to other Member States.
- **A TCN** referred to Slovenia as a positive example, highlighting the existence of bilateral agreements and nostrification procedures. In Slovenia, recognition may only require translation of documents. He also raised issues related to lack of information and financial barriers, noting that in Bulgaria, for example, medical diplomas can be nostrified upon payment of approximately EUR 150, followed by licensing requirements.
- **A TCN** (electrical engineer from Kenya, currently in Croatia) explained that although he is qualified as an electrical engineer, he is only recognised as an electrician. There is no fast-track recognition pathway, and recognition depends on holding a diploma from specific universities in Kenya, excluding many institutions. He stressed that lack of information and language barriers prevent migrants from fully utilising their skills. He suggested the creation of an information desk or helpdesk (e.g. an email or hotline) providing direct support and advocated for allowing migrants to work while the recognition process is ongoing. He further described the recognition process in Croatia, explaining that documents are submitted by post and assessed without interviews or interaction, leaving applicants with no opportunity to clarify their skills. Informal learning and skills are not recognised and are effectively lost. Professional experience is assessed only by employers and mainly serves to speed up access to qualified employment, but only if an employer is already willing to hire the individual. Finding an employer is difficult without recognised skills and a work permit. He suggested

introducing practical skills tests, micro-credentials, or short courses to demonstrate competences and stressed that speaking directly with someone via a hotline would be more effective than purely administrative procedures.

Annex 17.6.5 Interactive session

Following the introductory session, the meeting transitioned into an interactive plenary segment aimed at collecting participants' perspectives on the Policy Options under examination in the feasibility study. This part was organised around a set of poll questions, designed to capture participants' initial reactions. Each poll was followed by an open discussion, allowing for a more in-depth exploration of the results, during which participants could expand on their views, share relevant experiences and practices, and reflect on the potential implications of the proposed interventions. Additional inputs were also collected via the chat.

Question 1: To what extent have you experienced any difficulties to get your qualifications recognised in the EU?

Polls:

Option	Percentage
To a large extent	0% (0)
To a moderate extent	0% (0)
To a small extent	40% (2)
Not at all	60% (3)

Respondents: 5

Open discussion:

- **Representative working with migrant women in Malta** introduced her background, explaining that she is originally from Sudan and a co-founder of a migrant women Association in Malta. The organisation works to support migrant women, asylum seekers and refugees in their integration pathways, with a focus on facilitating access to employment and educational opportunities, as well as providing psychological services. It also delivers specific training programmes, including IT courses, case management for sexual and gender-based violence, and cultural competence. She outlined that her academic background is in business and accounting, and that she previously worked professionally in accounting. She currently works as an expert in the field of migrant women's integration and migration-related issues in Malta. Reflecting on her personal experience with the recognition of qualifications, she noted that she encountered some barriers in the process. In particular, she emphasised the difficulty of accessing clear and comprehensive information, including identifying the appropriate authority to approach, which took considerable time. She also pointed out that the requirements for recognition were numerous and not easy to navigate, especially for individuals coming from conflict-affected contexts such as Sudan. Furthermore, she highlighted the lack of clarity regarding whether certain universities are recognised in Europe in general or in Malta specifically. At the same time, she acknowledged that some aspects of her case facilitated the process. In particular, having studied in English made recognition easier, and the fact that her university is long-established and well-known also appeared to support the outcome. She then referred to an example from her professional experience,

describing the case of a client who attempted to have her medical degree recognised: the client faced significant challenges in finding clear information about the recognition procedures, despite having graduated from what she considered to be an established university. In conclusion, she stressed that, through her work, she and her organisation aim to support clients in accessing opportunities and obtaining recognition of their qualifications in Europe and within the labour market.

Question 2: What are the main difficulties you experienced in the process of recognition of your qualification?

Polls:

Option	Percentage
Understanding the requirements for the recognition of your qualification in a particular Member State	100% (3)
The compliance with the type and number of documents required	0% (0)
The translation of requirement documents	0% (0)
The payment of application fees	0% (0)
The final outcome	0% (0)

Respondents: 3

Question 3: How long did the recognition process take in your case?

Polls:

Option	Percentage
Less than 1 month	40% (2)
1-3 months	40% (2)
3-6 months	20% (1)
6-12 months	0% (0)
More than 12 months	0% (0)

Respondents: 5

Open discussion:

- **A TCN** noted that he does not have any qualifications and therefore did not provide a response regarding the recognition process.
- **A TCN** explained that he has not yet undergone the recognition process to Slovenia personally, but based on his discussions with others, the process usually takes between three to six months. He added that, in his experience, he has never heard of anyone completing it in less than three months and offered this information for context.
- **A TCN** shared his personal experience, noting that he applied for recognition as an engineer but received a lower qualification than expected, which he considered an incorrect assessment. He attributed this partly to communication issues, as the case handler was not fully proficient in English, and the entire process was basically conducted in Croatian, meaning that language barriers significantly complicated the procedure. He also pointed out the absence of an appeal process or feedback mechanism, suggesting that there should be a way to challenge or receive guidance on the assessment outcomes or the duration of the process. When asked for clarification by

the Contractor, Chris explained that the process involved submitting documents via postal service to the designated authority. No interview or assessment of experience took place: the authority simply reviewed the submitted documents and issued a certificate indicating the recognised qualification. He noted that this procedure was rigid and did not allow for any personal interaction or clarification.

- **Representative working with migrant women in Malta** added that one of the main barriers regarding recognition is the lack of a clear timeline for completing the process. This uncertainty complicates subsequent procedures, such as employment access. She also noted that information about next steps after recognition is often unclear. For instance, in Malta, if a qualification is recognised at a lower level, there are specific courses or tests that must be completed, but this information is not readily available to applicants.

Question 4: Did you review information on recognition in more than 1 Member State? To what extent did the recognition process differ between those Member State?

Polls:

Option	Percentage
No difference at all	0% (0)
Minor differences	0% (0)
Moderate differences	0% (0)
Significant differences	33% (1)
I only reviewed information for one Member State (N/A)	66% (2)

Respondents: 3

Open discussion:

- **A TCN** described his experience with recognition across different EU Member States. He explained that his qualification was recognised in Croatia; however, when he sought employment in another EU country, Denmark, it was not recognised. He would have had to start the entire recognition process again, which caused confusion, as he had assumed that qualifications recognised in one EU Member State would be valid across all Member States. Chris emphasised that the process is time-consuming and costly, and he suggested that recognition should ideally be streamlined so that a qualification recognised in one Member State is automatically recognised across the EU.
- **A TCN** reflected on his personal case, noting that he initially researched recognition in Croatia before considering Slovenia. He discovered that in Croatia he would need to retake certain exams, complete the full final exam, obtain the licence, and fulfil language requirements. He described this as a long and expensive procedure, which ultimately influenced his decision regarding which country to pursue his career in.

Question 5: To what extent would clearer EU-level information on recognition procedures available across Member States increase your understanding of recognition procedures?

Polls:

Option	Percentage
To a large extent	50% (1)

Option	Percentage
To a moderate extent	0% (0)
To a small extent	50% (1)
Not at all	0% (0)

Respondents: 2

Open discussion:

- **A TCN** explained that he rated the impact of clearer EU-level information as "to a large extent". However, he noted that, up to now, most of the information he had gathered came from individuals who had already gone through the recognition process, which does not guarantee that the same outcomes would apply to him. Another way to obtain information is to contact the embassy of the country where one wishes to apply. However, this approach is often unreliable, as embassies may not respond, provide limited guidance, or offer information only to candidates who meet certain perceived criteria. Having a single, accessible source containing all relevant criteria and procedural information across Member States would make it much easier to navigate and choose where to apply. Due to the current fragmented system, he tends to research only countries that are geographically close or familiar to him, potentially missing opportunities in other Member States that might offer greater benefits but are less known or lack a local embassy presence.

Question 6: Would digital verification of qualifications (i.e. supporting use of digital or AI-powered solutions for verification of documents; requiring issuance of qualifications as verifiable digital credentials) have simplified your recognition process?

Polls:

Option	Percentage
Significantly	0% (0)
Moderately	33% (1)
Slightly	66% (2)
Not at all	0% (0)

Respondents: 3

Open discussion:

- **A TCN** reflected that while an online platform would be helpful, it is equally important to have human support, such as a hotline, to address the specific details of individual cases. Standardised online information often addresses only common cases, whereas each applicant may face unique circumstances requiring personalised guidance. He also suggested the possibility of facilitating meetings with people whose qualifications have already been recognised, allowing applicants to learn from their experiences in addition to official guidance from authorities.
- **Representative working with migrant women in Malta** noted that she has not yet had any direct experience with digital verification of qualifications. Building on what proposed by Khalil Ahmad, supported the idea of dedicated digital verification, describing it as brilliant, but stressed the need for human involvement, such as support lines or direct

contacts. She further suggested involving a broader set of stakeholders - including NGOs, government entities, and training providers - to provide assistance, training, and guidance for applicants navigating online recognition procedures. Categorising types of professional education could improve the process, although she recognised that this may be complex. She concluded that digital recognition would be particularly valuable in emergency situations, such as during the COVID-19 pandemic, when access to in-person services is limited, and the need for online processes becomes critical.

Question 7: Did any difficulties encountered during the process of recognition of your qualifications affect your employment opportunities?

Polls:

Option	Percentage
To a large extent	66% (2)
To a moderate extent	0% (0)
To a small extent	33% (1)
Not at all	0% (0)

Respondents: 3

Open discussion:

- **A TCN** shared that the difficulties he encountered during the recognition process had a significant impact on his employment opportunities. He explained that he holds both an engineering and a law degree, but he was unable to have his law certificate recognised in Romania until he obtained nationality, a process that took approximately seven years. During this period, he was unable to work as a legal advisor and instead worked in an exchange office, which limited his ability to gain relevant professional experience. Many highly qualified professionals, such as specialist doctors, face similar barriers in Romania due to missing documentation, long bureaucratic procedures, or degrees from universities not recognised in Europe. He suggested that establishing special programmes to facilitate recognition within one to two years could help prevent the loss of qualifications and professional experience. Once he obtained Romanian nationality, the recognition process became easier, allowing him to work as a legal advisor and support other immigrants in integrating into society.
- **A TCN** confirmed that the recognition process had a substantial negative impact on his employment opportunities. He reported losing a significant opportunity to work for a reputable company in Denmark, which also offered relocation for his family. Because his degree was not recognised in Croatia, he was unable to move, resulting in prolonged family separation and missed professional experience in his field of engineering, specifically in building management systems and design. He emphasised that such delays not only affect career development but also personal and family life, noting the broader consequences of recognition barriers.

Question 8: If recognition procedures were simpler and faster, how would this affect your plans for your career in the EU?

Polls:

Option	Percentage
No change	0% (0)
Slight improvement	0% (0)
Moderate improvement	0% (0)
Significant improvement	100% (4)

Respondents: 4

Open discussion:

- **Representative working with migrant women in Malta** said that having clearer, faster, and simpler recognition procedures would make a significant difference, particularly for the individuals her organisation supports. For people who move to Europe with the intention of rebuilding their lives, working legally, and accessing employment aligned with their qualifications, time is a critical factor. Delays in the recognition process often push individuals to accept jobs that are not aligned with their educational background, resulting in a mismatch of skills and qualifications. She illustrated this point with a specific case from her experience. She described a woman who had graduated as a medical doctor and whose initial plan was to continue her studies and pursue a career in her field. However, due to the barriers she encountered in having her qualifications recognised, she was unable to follow this path. Although she was willing to work even as a nurse, she still could not access opportunities to practise in the field of her interest. As a result, she eventually changed her career trajectory entirely and is now working as a cultural mediator instead of in the medical profession. Clearer, faster, and more accessible recognition procedures would have a substantial impact on individuals' career plans, enabling them to pursue professional pathways that are aligned with their qualifications and to move forward more effectively within the European context.

Question 9: Which actors did conduct validation of your non-formal skills and informal learning?

Polls:

Option	Percentage
Employers	0% (0)
ENIC-NARIC centres	0% (0)
Competent authorities in charge of the process of recognition of professional qualifications	17% (1)
Migration authorities	17% (1)
Private credential evaluation companies	33% (2)
Other	33% (2)

Respondents: 3

Open discussion:

- **Representative working with migrant women in Malta** mentioned that there is no specific procedure in Malta for the recognition of informal learning. In response to a follow-up question from the Contractor regarding the potential usefulness of mechanisms to recognise informal learning - particularly for individuals from conflict zones who may

lack formal documentation - she affirmed that such mechanisms would be both necessary and effective. This could help address existing gaps in recognition processes. However, in practice, such mechanisms are not currently in place, neither at the institutional level nor, to her knowledge, among employers

- **A TCN** shared his personal experience, explaining that he does not have direct experience with formal recognition processes, as he does not hold an academic degree, which often surprises others given his extensive practical experience. In this respect, he emphasised that his experience represents his main qualification. His trajectory is shaped by the fact that he was unable to complete formal education in his country of origin due to family circumstances, including the loss of his family and lack of support. As a result, most of his skills were developed through practical experience. After arriving in Greece at around 20–22 years old, he took part in several training programmes delivered by civil society organisations, focusing on soft skills, entrepreneurship, and peacebuilding. In this regard, he stressed the important role of these organisations in providing opportunities often not available through public institutions, both in Greece and at EU level. At present, he works as a freelancer in Greece, runs a shop selling products from his country of origin, and is actively involved in advocacy as a human rights activist. In addition, he serves as president of his community, supporting members in areas such as accommodation, employability, detention, and residence permits. His engagement also extends to collaboration with several NGOs at national and EU level, and participation in a European Commission expert group on migration, asylum, and integration, which explains his involvement in the meeting. Despite this extensive experience, the absence of formal documentation limits access to certain professional opportunities, particularly in institutional contexts where proof of qualifications is required. Uncertainty remains around how informal skills and knowledge could be formally recognised and translated into documentation that would enable access to jobs aligned with existing competences. He also mentioned attempts to develop projects in Greece in collaboration with foundations and civil society organisations, using freelance status to issue invoices and carry out his work.

Question 10: To what extent did the recognition or assessment process take into account your skills and professional experience (rather than just your qualifications)?

Polls:

Option	Percentage
To a large extent	0% (0)
To a moderate extent	0% (0)
To a small extent	50% (1)
Not at all	50% (1)
My skills/experience were not considered at any point in the process	0% (0)

Respondents: 2

Open discussion:

- **Representative working with migrant women in Malta** reflected on her personal experience upon arriving in Malta, explaining that she initially focused only on the recognition of her academic qualifications. She noted that she did not consider the

recognition of her practical or professional skills at that stage, mainly due to a lack of information. She referred back to this recurring issue, emphasising that the absence of clear guidance makes it difficult to understand how to proceed with recognising non-academic competences. She recalled a meeting with the Higher and Further Education authority, during which she raised this concern, explaining that she has 11 years of experience working on migration, equality, and gender issues, yet does not know how to formally recognise these skills, which have been developed over time and are acknowledged in practice in the workplace. Although she has been able to access various job opportunities, this recognition remains informal and not formally validated. She also referred to Moussa Sangare's example, observing that even when individuals can demonstrate a long history of work in a given field, the absence of academic recognition makes it difficult to validate informal skills.

- **A TCN** mentioned that skills are primarily recognised by employers rather than through formal procedures. If an individual already has a job offer, this may facilitate the recognition process, as institutions might take this into account and potentially speed up the procedure. However, he stressed that skills alone are unlikely to influence the process unless there is an employer supporting the individual, suggesting that having someone "backing" the applicant plays an important role in how skills are considered.
- **A TCN** contributed by highlighting that many people are disadvantaged by the current system, which tends to prioritise formal qualifications over practical skills. He provided the example of someone trained in electrical engineering who may, in practice, have more experience in mechanical work, such as air conditioning installation. While such a person may be capable of performing the job, recognition of these skills often depends on first securing employment. However, he pointed out that this creates a structural barrier, as obtaining employment typically requires a work permit, and obtaining a work permit may depend on having recognised qualifications. As a result, individuals are often unable to demonstrate or validate their skills, even when they are highly competent. He questioned whether the current system is workable in this regard and suggested potential solutions, such as introducing practical or written tests to assess skills directly. He also proposed the development of micro-credentials, short courses, or training programmes that could help formally recognise informally acquired competences and make access to employment easier.

Question 11: How easy or difficult was it for you to communicate your skills and professional experience to employers or competent authorities?

Polls:

Option	Percentage
Very easy	0% (1)
Somewhat easy	100% (2)
Somewhat difficult	0% (0)
Very difficult	0% (0)

Respondents: 2

Open discussion:

- **Representative working with migrant women in Malta** explained that communicating her skills and competences would not be particularly difficult, either with employers or with competent authorities. However, she clarified that her response of "somewhat easy" reflects the fact that she has not yet had sufficient opportunities to interact directly with the relevant authorities. She highlighted that the main barrier lies in identifying and accessing the appropriate institutions responsible for assessing skills. Once this barrier is overcome and the correct authority is identified, she believes that communicating one's skills and professional experience becomes relatively straightforward.
- **A TCN** expressed a similar view, noting that the main challenge lies in identifying the right contact persons and establishing communication with them, including scheduling meetings. He emphasised that once contact is established, the process becomes much smoother. He therefore identified the initial step of locating the responsible authorities as a key barrier in the process.
- **A TCN** provided a more detailed perspective based on his experience in Romania. He explained that, in principle, it is possible to contact the National Centre for Recognition through phone numbers available online, and that communicating with them is not necessarily difficult. However, he pointed out that the main issue is that the available staff may not have sufficient information to address the wide variety of cases they encounter, given the diversity of education systems across countries. It is unrealistic to expect a limited number of individuals to be familiar with procedures and qualifications from such a wide range of countries. He suggested the need for a more standardised and centralised system at the European level, where clear and structured information would be available for different countries. This could include details such as recognised universities, examples of official documents (e.g. passports), and country-specific procedures for recognition. Such a system would make it easier both for applicants and for officials handling cases. Drawing on his personal experience, he described how the process was initially long and complex when he first applied through the platform, particularly as a non-EU citizen, which prevented him from pursuing recognition of his law degree. After obtaining nationality, however, the process became significantly faster, with his qualifications being recognised within a much shorter timeframe. He also shared observations from his current role as a legal advisor, describing cases where individuals faced significant challenges due to lack of recognition of their qualifications. For example, he referred to a case involving a woman from Myanmar whose university degree was not recognised at all in Romania, with no alternative assessment or compensatory measures offered, despite her having completed several years of higher education. He highlighted this as a major issue, noting that individuals from different countries often face inconsistencies due to variations in education systems (e.g. differences in the duration of medical studies), which are not adequately accounted for in the recognition process. There is a need to create "bridges" between different education systems, such as transitional programmes, exams, or additional training periods that would allow individuals to meet European requirements. He framed the current situation as a "lose-lose" scenario, particularly in light of Europe's demographic challenges and shortage of highly skilled workers, arguing that improving recognition systems would benefit both individuals and the broader economy.

Question 12: Do you think you are overqualified for your current job?

Polls:

Option	Percentage
Yes	33% (1)
No	67% (2)

Respondents: 3

Open discussion:

- Prior to his current position, **a TCN** was employed in a role for which he was overqualified, working in an exchange office despite holding two university degrees. He described this period as particularly difficult, noting that for approximately seven years he worked in jobs below his level of qualification because he needed employment but was unable to access positions aligned with his education. He highlighted several long-term consequences of this situation, including the loss of relevant professional experience and lower earnings, which he expects will also negatively affect his future pension. He further noted that age plays a role in employment opportunities, observing that it becomes more difficult to secure appropriate work after the age of 40 compared to one's 30s. He contrasted this past experience with his current situation, stating that he now feels satisfied as his job aligns with his qualifications.
- **A TCN** expressed a similar perspective, stating that he feels he is not fully utilising his abilities, estimating that he is using only around 50% of his potential in his current role. The tasks he is performing are similar to those he carried out in his 20s, which he finds discouraging. While acknowledging that he still has some time to progress professionally, as he is currently 34, he emphasised the urgency of addressing these issues. Many highly skilled individuals are unable to contribute fully to the economies of their host countries due to recognition barriers, resulting in a loss of valuable talent. He argued for greater harmonisation of recognition systems at the EU level, suggesting that a unified approach could improve mobility and satisfaction among skilled workers. He also referred to existing models outside the EU, such as private credential evaluation systems used in countries like Canada and the United States, where recognition processes can be completed within one to two weeks. He suggested that, if public systems are under pressure due to high demand, accredited private organisations could be allowed to support the process, provided they meet appropriate standards. In his view, this could contribute to faster, smoother, and more efficient recognition procedures.

Annex 17.7 Online Focus Group 7 (FG7) on Quality Assurance and Automatic Recognition

Annex 17.7.1 Agenda of the meeting

Time	Agenda item
09:30 – 09:40	**Welcome** • Opening remarks by DG EMPL • Presentation of the objectives of the focus groups and housekeeping rules
09:40 – 10:00	**Introductory session** • Presentation of the study • Recap of problem definition • Presentation of policy objectives and identified policy options

Time	Agenda item
10:00– 10:10	**Q&A**
10:10– 10:20	**Coffee-break**
10:20 – 12.20	**Focused discussion (in plenary),** interactive discussion with polls questions on the impacts of the identified policy options
12:20– 12:30	**Wrap-up and next steps** • Summary of key takeaways by facilitator • Explanation of how the inputs will feed into the study • Closing remarks and thanks

Annex 17.7.2 Introductory session

The Deputy Head of Unit B.5 in DG EMPL opened the meeting by outlining the Skills Portability Initiative, particularly Action 3, as a key priority of the current Commission mandate, situated within the broader framework of the Union of Skills, which aims to ensure that TCNs can fully use their skills and competences when entering the EU Single Market.

Annex 17.7.3 Presentation by the study Team

The Contractor presented the problem tree (presented in Annex 1 of the current document) in all its constituting elements: core problem, its consequences, but most importantly the drivers of the problem and their underlying issues.

The Contractor also briefly presented the objective tree (presented in Annex 2 of the current document), linking the core problem and the three identified drivers to one general and three specific policy objectives. Lastly, the Contractor presented the three identified policy options (PO), with a specific focus on PO3 and automatic recognition The contractor clarified that the identified drivers and the resulting policy objectives will guide the development of relevant policy measures.

Annex 17.7.4 Q&A

- **The QA authorities from the UK and FI** sought clarifications regarding the availability and robustness of statistical evidence used to assess the scale of the problem, in particular the number of TCNs(TCNs) affected in the occupational areas under consideration and the magnitude of the challenge at EU level. **The contractor** explained that the assessment of the scale of the challenge is based on a combination of quantitative and qualitative data sources collected throughout the study. These include surveys addressed to relevant authorities and stakeholders, as well as in-depth interviews. **The contractor** also underlined that the situation varies considerably across Member States and occupational sectors, and that this heterogeneity is reflected in the analysis through triangulation of evidence rather than reliance on a single dataset. **DG EMPL** further added that, at EU level, the presence of TCNs in the labour market is significant. It was noted that the number of TCNs working in the EU is approximately twice the number of EU nationals working in another Member State. **DG EMPL** illustrated this with the example of Germany, where around one in five healthcare professionals has a foreign nationality, with Syrian nationals representing the largest group.
- **The QA authority from BE** asked how QA frameworks could be used effectively in the context of recognition, without creating parallel structures or new quality assurance bodies. **The contractor** explained that consultations and evidence gathering (including the call for evidence/public consultation and targeted interviews, notably with

bodies/competent authorities in the healthcare sector) revealed persistent doubts among Member State authorities about the effectiveness, consistency, and reliability of quality assurance systems in third countries; these doubts were often linked to lack of documented and verifiable information and were particularly salient in regulated healthcare professions where concerns relate not only to degree comparability but to training systems and whether training is subject to equivalent quality controls. **DG EMPL** explained that these doubts affect trust and understanding of third-country qualifications and, in feasibility terms, raised the question whether variance across and within third countries could limit simplified or "blanket" recognition approaches.

- **The QA authority from LT** asked for clarifications of the issue focusing on quality assurance (QA) in the problem definition (i.e. Doubts about the efficacy of QA within third-country systems). **The contractor** explained that QA is a fundamental precondition for establishing trust in third-country qualifications. Through consultations, the limited access to reliable and verifiable information was stressed as a major obstacle hindering trust in QA systems of third countries. **DG EMPL** explained that QA must be considered together with compliance with minimum training requirements. It was underlined that recognition is often complicated by limited availability of information and, in some cases, by a lack of cooperation from third countries.
- **The QA authority from NL** asked whether competent authorities should be involved more directly, noting that in the Netherlands the ENIC NARIC provides advice, but the competent authority may or may not follow it, and stressing that six of the seven professions discussed are medical. **The contractor** explained that the study has actively consulted competent authorities (including via targeted surveys and interviews) and that the evidence base includes competent authorities' perspectives; **the contractor** also noted the relevance of differences in how recognition decisions are taken across national systems.
- **An EU agency** asked why the focus is on the seven professions benefiting from EU automatic recognition rather than on shortage occupations more broadly, and suggested testing automatic recognition on one or two shortage occupations outside tertiary education (e.g. VET type occupations) to explore feasibility beyond the current scope. **DG EMPL** explained that the focus on the seven professions is linked to the existence of EU level minimum training requirements and an agreed EU standard that can be used as a benchmark for automatic recognition; without a common EU standard, automatic recognition across Member States is not feasible. **For** other shortage occupations (e.g. electricians) there are 27 national standards rather than a single EU benchmark. **DG EMPL** added that, in practice, the seven professions overlap substantially with shortage occupations reported by Member States (particularly in healthcare), while acknowledging that architects are less frequently reported as a shortage occupation.
- **The QA authority from South Africa** asked whether the approach would apply a "blanket" review or be conducted country by country, arguing that South Africa has rigorous QA and professional body controls (including ethics/standards) and querying how trust assessments would handle systems with strong verification mechanisms. **The contractor** explained that the discussion concerns doubts expressed by Member State authorities about third country QA systems overall, often due to limited access to information and verification challenges; **the contractor** emphasised that trust varies by third country and that stakeholders have questioned whether variance across and within third countries limits simplified or blanket recognition. **DG EMPL** also explained that the concept being explored is institution and programme level assessment (rather than

assuming uniformity at country level), and that feasibility questions, such as how to ensure "full understanding and full trust" in QA systems, are precisely what the focus group is intended to test with stakeholders.

- **The migration expert** asked for clarifications on the role of trusted bodies and capacity constraints, particularly in smaller Member States and in contexts of large inflows of professionals, referring in particular to the experience with Ukrainian professionals. **The contractor** explained that the designation of trusted reviewing bodies at EU level could help alleviate the workload of national regulatory authorities by verifying qualifications and compliance with minimum training requirements upstream, while allowing national authorities to retain final decision-making powers; this could increase overall system capacity. **DG EMPL** explained that competent and regulatory authorities would continue to have the final say on recognition decisions but acknowledged that upstream verification could significantly reduce administrative pressure, especially in smaller Member States or in high-volume situations, while noting that establishing or adapting such arrangements would be complex and potentially lengthy.

Annex 17.7.5 Interactive session

Following the introductory session, the meeting transitioned into an interactive plenary segment aimed at collecting participants' perspectives on the Policy Option under examination in the feasibility study. This part was organised around a set of poll questions, designed to capture participants' initial reactions, as well as open questions intended to gather broader reflections beyond the predefined options. Each poll was followed by an open discussion, allowing for a more in-depth exploration of the results, during which participants could expand on their views, share relevant experiences and practices, and reflect on the potential implications of the proposed interventions. Additional inputs were also collected via the chat.

Question 1: Based on your experience, to what extent does the recognition of foreign qualifications hamper the recruitment of talent from outside the EU?

Polls:

Option	Percentage
To a large extent	33%
To a moderate extent	52%
To a small extent	14%
Not at all	0%

Respondents: 21

Open discussion:

- **The QA authority from FI** indicated a "to a moderate extent". Limited availability of reliable information on foreign qualifications was highlighted as a persistent and widely shared issue across countries. The absence of a system comparable to IMI was noted as a key gap, particularly in relation to verifying the authenticity of qualifications and

confirming their attribution to individuals. The contribution focused primarily on the practical aspects of recognition procedures.

- **The QA authority from Türkiye** also indicated “to a moderate extent”, framing the from the perspective of third countries. There is lack of clarity regarding which qualifications are recognised within the EU, with some limited exceptions in health-related fields such as nursing and rehabilitation. This lack of transparency was described as contributing to a “push rather than pull” dynamic, whereby institutions are unable to effectively guide students towards opportunities in the EU. The absence of clearly defined pathways for graduates was thus identified as a structural limitation.
- **An EU agency** referred to concrete experiences from a workshop organised by a private clinic in Italy, focused on labour shortages and possible responses. Two examples were highlighted. The first concerned Filipino nurses who, due to missing approximately 150 hours of training, are required to repeat the entire nursing education programme. This was framed as a significant inefficiency, given that individuals have already invested several years in their training. The issue was linked to the broader question of individual agency and mobility, noting that people move and that requiring full retraining results in a loss of prior investment in human capital, particularly time, which was described as the most significant investment. It was also noted that these individuals may spend additional years retraining in the destination country. Reference was made to anecdotal evidence from the COVID-19 period, during which temporary amnesties allowed such professionals to practise. However, these measures were only temporary, and once expired, individuals were again required to return to formal education rather than being offered a bridging solution to address the limited training gap. This raises concerns about the attractiveness of Europe in such cases. The second example concerned medical doctors. Hospital management reportedly expressed willingness to recruit qualified doctors, including surgeons and specialists. However, in the Italian context, recognition procedures allow only for the recognition of general medical training, not specialisations. As a result, even after undergoing complex and lengthy bureaucratic procedures, a specialised doctor (e.g. a surgeon) may not be able to practise in their field and may not even qualify as a general practitioner, which itself requires specific specialisation. These constraints were described as significant obstacles, potentially discouraging professionals from choosing Europe in favour of countries with more accessible or harmonised recognition systems. This was linked to the broader structural issue of fragmentation across the 27 Member States, which undermines the attractiveness of the European space.
- **An EU agency** contributed from the perspective of vocational education and training, and the analytical work conducted in relation to third countries, also in collaboration with the European Commission and Cedefop. The focus was placed on recognition of vocational qualifications, beyond the medical professions discussed earlier in the session. Reference was made to a report published by ETF approximately one year earlier, which identified a misalignment between the data held by EU countries and the data required from non-EU countries for recognition purposes. Additional challenges include the dispersion of recognition functions and data across institutions within Member States, making it unclear where applicants should apply. While this issue is somewhat less pronounced in regulated professions (e.g. medical professions), where national competent authorities are usually clearly defined, it remains significant in the vocational domain. The predominance of case-by-case assessment of both qualifications and individuals was highlighted as contributing to slow procedures. Overall, recognition was

described as a serious problem, particularly for mid-level qualifications corresponding to EQF levels 3, 4 and 5.

- **The migration expert** stressed that the use of the seven sectoral professions and their minimum training standards under the Professional Qualifications Directive was identified as a potential benchmark or common interface for assessing third-country qualifications. However, analysis revealed important variations in implementation across Member States. For some professions, such as nursing, minimum training standards are broadly applied, whereas for others, such as midwifery, national systems have evolved differently. In some cases, notably in France, training has expanded significantly beyond the minimum standards, with midwives approaching the level of medical doctors. This raises questions about how automatic recognition or common interfaces could function in practice, even within formally harmonised sectors. Further remarks addressed the limited use of temporary waivers introduced during the COVID-19 pandemic and for Ukrainian professionals. While such waivers allowed individuals to work under supervision, they have generally not been leveraged to support subsequent recognition. Only a few cases (e.g. Austria and Poland) were identified where supervised practice under a waiver contributed to accelerated recognition pathways. The broader lack of follow-up was characterised as a missed opportunity.
- **The QA authority from the UK** raised a question regarding the operational scope of automatic recognition processes. Uncertainty was expressed as to whether such processes apply only to newly accredited programmes or also retrospectively to individuals who completed recognised programmes in the past. Concerns were raised about qualifications obtained 10 to 30 years ago, at a time when institutions and programmes may not have aligned with current European standards. Clarification was sought on whether such individuals would be eligible for recognition and how this would function in practice.
- **The QA authority from NL** introduced an additional consideration related to language requirements. In the Dutch context, even when foreign diplomas are recognised by the Ministry of Health, professionals are required to pass a strict language test in order to practise. This requirement was identified as a significant additional barrier, potentially preventing access to the profession despite formal recognition of qualifications.
- **The QA authority from FI** provided a further intervention following clarification intervention from the European Commission, emphasising the importance of both quality assurance and compliance with minimum training requirements. While the presentation of the Study focused strongly on quality assurance, it was noted that meeting minimum training conditions is equally important, particularly in relation to safety considerations. Questions were raised regarding engagement with third countries and higher education institutions potentially interested in such recognition frameworks. Reflections were also offered on the relationship between qualification titles and institutional accreditation, noting that current systems often rely on both. Potential implications were identified for third-country qualification systems and for Member States' existing practices, including the use of listings and databases. While the regulatory status of professions may not be central to the discussion, it was considered relevant in relation to available information tools. Existing systems such as IMI were also mentioned as potential elements to be connected to future developments.
- **The QA authority from SI** highlighted several foundational European frameworks, including the European Qualifications Framework (EQF), ESG standards for quality

assurance, and ECTS, as key reference points for ensuring the quality of education in both academic and professional contexts. It was suggested that accredited institutions in third countries aligned with these frameworks could be considered as meeting European standards and used as benchmarks in recognition processes. For medical professions, international organisations such as the World Federation for Medical Education (WMFE) were identified as potential partners and sources of expertise. Reference was also made to databases listing accredited programmes and institutions, such as DEQAR, as useful tools. Finally, examples of successful practices in automatic recognition, including recent developments in the Netherlands, were mentioned as possible starting points for extending recognition approaches to third countries.

Question 2: What are the main difficulties you experienced in the process of recognition of your qualification ?

Polls:

Option	Percentage
Very positive – this would significantly benefit my organisation and sector	6%
Positive – this would be helpful, with some reservations	63%
Neutral – I'm not sure how this would affect us	13%
Negative – I have concerns about this approach	19%
Very negative – I am opposed to this approach	0%

Respondents: 16

- Drawing on her knowledge, **the migration expert** referred to the case of Ireland as an example of an existing approach. In this case, it was noted that approximately 98% of nurses from India and the Philippines were found to meet national standards. On this basis, the system has moved away from fully case-by-case assessment towards a more generalised evaluation based on three criteria, followed by the application of compensatory measures. These measures were still considered necessary, particularly to ensure adaptation to the Irish healthcare context, despite the high quality of the initial training. A question was raised as to whether similar approaches are being implemented in other Member States, especially in relation to specific countries or institutions, and whether any country is already providing full and automatic recognition for third-country nationals.
- **The QA authority from Türkiye** highlighted that the feasibility of such approaches depends on several factors, including scalability, the capacity of quality assurance systems, and the ability to ensure consistent standards across different review processes.

Question 3: If an EU framework of automatic recognition were implemented, how do you think it would affect your organisation's ability to recruit internationally qualified professionals?

Polls:

Option	Percentage
It would significantly improve our ability to recruit	18%
It would somewhat improve our ability to recruit	29%
It would make little difference	12%
It could create new complications	12%
I don't know	29%

Respondents: 17

Open discussion:

- In response to a previous comment regarding what is in place other countries, **the QA authority from New Zealand** referred to an example from outside the EU, mentioning the Trans-Tasman Mutual Recognition Agreement (TTMRA) between New Zealand and Australia. This agreement enables medical professionals who are registered in one of the two countries to register in the other within the same scope. The process was described as very quick.

Question 4: If qualifications from certain third-country institutions were automatically recognised across the EU, what would be the main benefits? (select all that apply)

Polls:

Option	Percentage
Faster and more efficient recruitment processes, by reducing lengthy and repetitive recognition procedures	12%
Greater predictability and legal certainty in recognition outcomes for both employers and TCNs	20%
Limited or no benefits	2%
Improved access to skilled professionals in regulated professions experiencing labour shortages	10%
Reduced administrative burden and costs associated with qualification recognition and validation	14%
More consistent recognition outcomes across the EU, limiting fragmentation between Member States	6%
Better utilisation of skills, reducing overqualification and underemployment of third-country nationals	10%

Option	Percentage
Stronger trust in recognised third-country qualifications and skills acquired outside the EU	8%
Greater attractiveness of the EU labour market for highly qualified third country professionals	10%
Improved workforce planning, especially for SMEs and sectors facing structural shortages	6%
Other	0%

Respondents: 15

Question 6: The system we are proposing would enable automatic recognition of third-country qualifications in seven regulated professions — nurses, midwives, doctors, dentists, pharmacists, architects and veterinary surgeons — where the EU already sets minimum training requirements under Directive 2005/36/EC. In your view, in which of these professions do you think automatic recognition could make the most meaningful contribution to addressing labour shortages in the EU?

Polls:

Option	Percentage
Nurses	42%
Midwives	13%
Doctors	21%
Dentists	5%
Pharmacists	11%
Architects	5%
Veterinary surgeons	3%

Respondents: 17

Open discussion:

- **The migration expert** raised a clarification question regarding the scope of automatic recognition, specifically whether it would apply to the degree only or also to the licence to practise, noting that this distinction has significant implications. Reference was made to the Irish case, where recognition is based on education but does not automatically grant a licence, as additional steps are still required. A question was posed as to whether the proposed system would mirror the EU model for EU nationals, where recognition leads directly to access to the profession, or whether it would remain limited to educational recognition. To her clarification, the **Commission** stated that the proposal is still a policy option not yet fully defined in detail. Input was requested on how the option

could be designed. In principle, the view was expressed that the process should align with that for EU nationals, meaning that after recognition access to the profession would be granted under the same conditions as nationals. It was noted that other requirements may still apply, such as language requirements, but that there should not be a separate recognition process after the initial recognition step. Maria Vincenza Desiderio then asked the Commission whether any Member State is already implementing full automatic recognition for third-country nationals. The Irish case was mentioned again as the closest example, although not considered fully automatic. It was noted that it represents an improvement in predictability and workload reduction for regulatory authorities. A further point was made that when part of the workload is handled through simplified procedures, regulatory authorities are able to focus more on complex cases, benefiting the system overall. The **Commission** replied that some Member States use databases where qualifications that have already been assessed can be more easily processed, but this does not amount to automatic recognition.

- **The QA authority from the UK** Suggested that a cost-benefit analysis at the level of individual professions would be useful, noting that potential benefits should be assessed alongside costs for Member States, providers and individuals.
- **An EU agency** Stated that existing records of previously processed recognition cases could be used as a starting point. It was noted that there are records of files processed over previous years, and that it would be important not to start from zero but to build on existing information. It was suggested that these records, particularly in relation to the seven professions, could help identify outcomes of recognition processes and institutions whose qualifications have been consistently assessed. This could help identify institutions that are de facto closer to EU quality expectations. It was also noted that there is wide variation in quality both within Europe and within individual countries, and that this variability is even greater in third countries, contributing to uncertainty and mistrust. It was suggested that consolidating existing recognition data could help address this gap by identifying institutions that have previously produced positive outcomes in recognition processes.
- **EQAR** stated that it may be challenging to evaluate all decisions taken by ENIC-NARIC centres but noted that the database for quality assurance results maintained by EQAR contains a large number of quality-assured programmes, including in regulated professions such as medicine. This database could serve as a starting point for identifying programmes, their origin, the responsible quality assurance agencies, and evaluation outcomes. It was also stated that, in current practice, registration of a quality assurance agency in EQAR is already considered a sort of guarantee for quality of the programme. Thus, it was suggested that the scope could be extended beyond EU-based quality assurance agencies to include EQAR-registered agencies more broadly, including those in countries such as Türkiye, Armenia and Kazakhstan, whose decisions are recognised within the European Higher Education Area. Reference was also made to DEQAR as a wide repository – containing, for example. approximately 7,000 to 8,000 reports on medical programmes - which could be used as a resource for identifying accredited programme.
- **An EU agency** suggested that some Member States, including Czechia and Slovakia, may already have had facilitated recognition procedures for certain neighbouring countries prior to the war in Ukraine, including Belarus and Ukraine. These procedures were described as simplified nostrification processes, which may be useful examples to examine.
- **An EU agency** stated that the system proposed by the Commission does not sufficiently take into account the role of regulatory bodies such as qualification authorities, quality assurance agencies and accreditation entities. It was suggested that instead of analysing each training programmes or curricula, attention could be focused on how accreditation systems operate in countries of origin. If these systems are considered reliable, then qualifications accredited through them could be accepted. Without such an approach, the system risks becoming very complex due to the large number of programmes requiring assessment.
- **The migration expert** referred to the case of Czechia, already mentioned by Sona Kalantaryan, where recognition procedures were described as demanding, including a requirement to pass a Czech language examination. However, for the neighbouring countries - but not for everyone - a pragmatic solution exists whereby, after diploma

recognition (nostrification) - which can be quite easy depending on the university - candidates are allowed to work under supervision while completing the full recognition process. This approach was presented as a way to address long waiting periods, during which individuals may otherwise be unable to work or may be required to accept lower-skilled employment. Thus, this allows individuals to remain active in the labour market during the recognition process. It was further stated that no fully automatic recognition system is known to exist, but that in practice "sample-based" or streamlined assessment approaches are used in some cases. When authorities observe consistent positive recognition outcomes for qualifications from certain institutions - for example, in India or Philippines - they may avoid repeating full assessments for each case. Cooperation and trust with regulatory authorities in countries of origin were also highlighted as important elements. Recognition could be based on evidence that certain qualifications meet benchmarks, while still allowing for language requirements and possible adaptation to national context. Even without full automatic recognition, improved predictability (for example recognition within three to six months) would already represent a significant improvement and could be more feasible in practice.

Question 7: What do you think are the condition or assurances that would need to be in place for automatic recognition to work well across different national contexts?

Open discussion:

- **The QA authority from SI** emphasised the importance of breaking down the issue of automatic recognition into smaller, more manageable components. For example, the category of "third countries" is extremely broad, encompassing very diverse systems worldwide. Reference was made to the Bologna Process as providing instruments that create preconditions for trust within Europe, particularly through external quality assurance aligned with the European Standards and Guidelines (ESG). In countries where quality assurance agencies are evaluated as compliant with ESG, there is a higher level of trust in qualification systems. A distinction was made with countries outside the European Higher Education Area, where greater attention would be needed to regional specificities, including the maturity of external quality assurance systems and the robustness of internal quality assurance. Thus, quality assurance is certainly a key precondition for trust in qualifications. The availability of information is also a major challenge. Despite technological advances, access to reliable information on qualifications remains limited. Some countries may have limited incentives to share information, for example in order to prevent emigration, which needs to be taken into account, since always in the interest of other countries to cooperate. At EU level, the idea of pooling resources and enabling shared access to information was supported. However, concerns were raised about a system allowing applicants from any third country to apply to any Member State, with that State bearing the full workload of recognition and the outcome being valid across the EU. The issue of limited resources within recognition bodies was also identified as a major obstacle. Despite policy recommendations calling for adequate resourcing of ENIC-NARIC centres and quality assurance agencies, these are often not matched by actual national-level investments, leading to a gap between policy objectives and operational capacity.
- **An IO** highlighted the global dimension of recognition, referring to work covering both EU and non-EU countries. In particular, emphasis was placed on the need to address recognition in a fair, transparent and non-discriminatory way, while respecting the diversity of education systems worldwide rather than promoting a single global standard. For this reason, it is very important to build capacity and understand different systems. The Global Convention on the Recognition of Qualifications concerning Higher

Education was identified as a key normative framework that can support this process, including by setting expectations and facilitating access to trusted information. The role of information-sharing through networks of national implementation centres was emphasised, alongside the importance of adequate resources, awareness-raising and the development of implementation networks to support participation across regions.

- The **Contractor** raised a follow-up question regarding which third countries or regions might be prioritised for cooperation in the context of automatic recognition, and which factors could shape this interest. Reference was made to elements already discussed, including quality assurance, willingness to share information, and possible misalignment between EU objectives to attract talent and the policy priorities of third countries.
- **The QA authority from LT** referred to the Global Recognition Convention and the importance of countries establishing information centres as recommended under the Convention. These centres were described as facilitating access to information and supporting understanding and recognition processes. It was also noted that discussions in other forums – such as ETF and Cedefop - have highlighted the need to consider migration not only as a one-way process, but as a form of mutually beneficial cooperation. The issue of brain drain, for example, is a significant concern for countries of origin, suggesting that EU policies should incorporate elements of mutual benefit in labour migration.
- **An IO** further emphasised the role of the Global Recognition Convention, noting that ratification by countries could serve as a condition for building trust. It was mentioned that around 40 countries have ratified the Convention, which entered into force in 2023, and that ratification helps clarify responsibilities such as identifying competent recognition authorities. Attention was also drawn to the responsibilities associated with promoting streamlined recognition pathways. It was noted that such approaches may increase the attractiveness of migration opportunities and therefore should be accompanied by consideration of potential impacts, including brain drain. The importance of mutual capacity building and ensuring reciprocal benefits was reiterated.

Question 8: The option relies on designated 'trusted review bodies' to verify training programmes. To what extent do you have confidence that such a system could ensure quality and reliability?

Polls:

Option	Percentage
To a large extent	27%
To a moderate extent	67%
To a small extent	7%
Not at all	0%

Respondents: 15

Open discussion:

- **The migration expert** expressed concerns linked to capacity constraints, connecting this point to earlier remarks. Particular pressure on national authorities was noted, especially in smaller Member States that had previously handled limited volumes of applications and then experienced sudden increases, as in the case of Poland with

arrivals from Ukraine. The use of waivers is thus linked to the inability to manage such volumes. The introduction of a trusted EU-wide reviewing authority can be a way to assess whether qualifications meet minimum training standards, thereby removing part of the workload from regulatory authorities. This would be beneficial regardless of whether it leads to automatic recognition or remains a step within the process. A tendency of authorities to retain control over final registration decisions was acknowledged, but removing this layer of assessment was seen as significantly streamlining procedures and supporting harmonisation, as evaluations would be carried out against a common benchmark rather than through differing national approaches. Differences in assessment practices across regulatory authorities were highlighted, including situations where authorities do not trust each other's decisions, despite existing provisions and internal mobility rules allowing TCNs to obtain recognition after a certain period. A central reviewing mechanism would reduce reliance on mutual trust while increasing overall capacity, as authorities would not need to conduct the full process themselves. The idea of an EU-wide reviewing agency was thus viewed positively, while noting that questions remain regarding whether it should build on an existing body, how mandates would be defined, and how efficiency and speed could be ensured.

- **EQAR** emphasised the need for an underlying quality framework to guide the initiative, clarifying what is considered trusted and according to which standards. The European Standards and Guidelines (ESG) are certainly a widely used reference point. Other methodologies are applied by some regulatory bodies; however, compatibility and mapping against ESG were considered key conditions for ensuring coherence. Therefore, it is fundamental to avoid the creation of parallel structures. The development of new frameworks or new lists of quality assurance bodies was seen as unnecessary, given the existence of established mechanisms at European level. Building on existing structures is preferable, as these already embody a certain level of trust developed within the Bologna Process.
- **The QA authority from LT** addressed the international alignment of quality standards. Within the European Higher Education Area, ESG are certainly the main reference. At global level, the International Network for Quality Assurance Agencies in Higher Education (INQAAHE) and its International Standards and Guidelines (ISG) were highlighted. Agencies not operating under ESG may undergo reviews based on ISG. Potential was identified in examining the alignment between ESG and ISG and in taking into account the results of such reviews when assessing the quality of higher education institutions or systems.
- **The QA authority from the UK** introduced a distinction between European and international standards. The ESG are supported by a structured system, including EQAR, which manages a register and oversees review processes through an independent governance structure involving stakeholders and Member States. In contrast, ISG operates through a network of agencies without a comparable independent body overseeing reviews. A conceptual distinction was also outlined: while ISG are more global and broadly applicable, the system proposed by the study concerns the enforcement of European minimum training requirements. In this context, alignment with the European Quality Assurance Framework (QAF) can be more directly relevant, as third-country providers would be expected to meet European standards rather than broader international ones.
- **The QA authority from SI** supported the points raised on quality assurance and extended the discussion beyond the European Higher Education Area (EHEA). INQAAHE was identified as an increasingly relevant global reference, with growing participation of agencies worldwide. Additional regional organisations were mentioned, including the Council for Higher Education Accreditation (CHEA) in the United States, the Asia-pacific Quality Network (APQN), and probably similar others in Africa and

South America and South America. These were described as established organisations that could be engaged and aligned with European counterparts in the context of external partnerships.

Question 9: What conditions would need to be in place for Option 3 to work well in practice?

Polls:

Option	Percentage
Clear EU-level quality assurance criteria for third-country qualifications	20%
Strong and transparent governance of trusted review bodies	27%
Clearly defined scope (limited professions / countries / institutions)	10%
EU-wide transparency, including a public list of recognised qualifications and institutions	15%
Robust digital systems (e.g. secure digital credentials and verification tools)	12%
Possibility of additional safeguards for sensitive professions	7%
More systematic mechanisms to ensure the recognition of professional experience and validation of skills	2%
Alignment with work permit and legal migration procedures	2%
Possibility to work while recognition is ongoing	5%
None of the above	0%
Other	0%

Respondents: 14

Open discussion:

- **An EU Agency r**aised a distinction between quality assurance and compliance with EU minimum training requirements. The existence of quality assurance mechanisms at institutional level may not be considered sufficient to ensure alignment with EU standards. The two elements were described as complementary and both necessary, particularly in professions where minimum training requirements are defined at EU level. The need to treat them jointly rather than as alternative options was emphasised.
- **EQAR** supported the view expressed by Sona Kanlantaryan, stressing that quality assurance frameworks and minimum training requirements should be considered together, without one excluding the other.
- **The Migration expert** agreed on the complementarity between quality assurance and training standards, while also noting a potential indirect effect of introducing a

benchmark. The establishment of a recognised standard at EU level could contribute to raising quality levels in countries where quality assurance systems are less developed. A direct experience from the ASEAN region was mentioned, where the existence of common benchmarks has contributed to upward convergence in standards despite significant differences across countries.

- **The QA authority from the UK** focused on the scale and resource implications of implementation. The potential volume of applications would be very large, with examples such as thousands of providers in a single country seeking approval. Thus, the operational complexity of assessing programmes at this scale was highlighted, including the possible need for external experts, on-site visits, documentation reviews and independent committees. The implementation of the proposed policy options was described as still not clearly specified, particularly in terms of practical organisation and resource requirements. The overall process is potentially extremely costly, both financially and in terms of expertise.
- **The QA authority from SI** pointed to an emerging trend of cross-border accreditation carried out by EQAR-registered quality assurance agencies, either individually or jointly. This was presented as a development that could support quality assurance for graduates and facilitate recognition processes at EU level.
- **The QA authority from LT** referred to the role of the World Federation for Medical Education (WFME) in the field of medical education. WFME is operating a recognition system for quality assurance agencies worldwide, with broad geographical coverage, including SKVC in Lithuania. The standards applied by WFME are broadly aligned with the ESGs, with significant overlap in requirements. This framework was presented as a relevant reference point, particularly for medical professions**.**
- **The QA authority from the UK** noted that, where systems are aligned with ESG, on-site visits to third-country providers would likely remain necessary. This was highlighted as an additional factor to consider in terms of resources.
- **EQAR** added that WFME standards are mapped against ESG, and that agencies applying WFME methodologies can upload their reports to DEQAR, given this alignment.
- **An EU agency** suggested adopting a phased approach to implementation in order to manage potential volumes of applications. A gradual expansion was proposed, starting with a limited number of countries or institutions based on defined criteria, and then scaling up over time. Political priorities, such as cooperation with specific countries or labour market needs - like shortages in medical professions - could guide this selection. Concerns were raised about the risk of receiving a very high number of applications if the system were opened immediately at global scale. Capacity constraints would be not only in financial terms but also in relation to the availability of qualified experts, which would require time to develop.
- **The QA authority from LT** expressed scepticism regarding the feasibility of establishing and maintaining an EU-level list of trustworthy higher education institutions. Responsibility for such lists should lie primarily with national authorities, given the rapidly evolving nature of higher education systems. Doubts were raised about the EU's capacity to monitor these developments in a credible and effectively updated manner. At the same time, the need for an inventory of trustworthy approaches in the context of more automatic recognition procedures was emphasised. As a starting point, alignment with the European Standards and Guidelines (ESG), membership in EQAR, and the

availability of quality assurance reports can constitute a minimum baseline. Beyond this, additional ways of establishing the credibility of quality assurance systems would need to be considered. In relation to resources, the issue was described as complex. It was considered inappropriate to define universal standards for the level of investment in education systems as an indicator of quality, given the variation in costs across countries. A warning was also raised against overly Eurocentric assumptions about how quality assurance should function, noting that quality may be achieved under different conditions. At the same time, the availability of infrastructure for practical training, such as laboratories and related facilities, was highlighted as a challenging but relevant aspect.

Question 10: What role, if any, should employers and business associations play in the design and governance of the review system?

Open discussion:

- **The migration expert** framed the issue primarily as a matter for regulatory authorities rather than employers. The process is focusing on benchmarking qualifications against minimum training standards already applied within Member States for EU citizens, with the intention of extending the same approach to third-country qualifications. In this context, the role of employers was considered limited, as the process concerns regulatory authorities. The involvement of employers could be relevant in other stages, but not in this specific component.
- **The QA authority from FI** returned to a point raised earlier regarding the overall approach. The current direction was understood as focusing on institutions; however, institutions are operating in a vacuum, but as part of broader systems that include governance structures and other layers behind the provision of medical education. An approach based on institutions putting themselves forward was viewed with scepticism and considered potentially not feasible, even when taking into account quality assurance and registration aspects. Questions were raised about how elements such as qualification titles would be handled, given the wide variation across countries in how titles are defined, controlled and used. Reference was also made to the possible involvement of a limited number of countries, or selected cases, depending on whether it is legally possible to restrict access to such a process. At the same time, agreement was expressed with concerns about the potentially large number of applications that could be directed to a European-level authority.

Question 11: Are there any aspects of the problem or the proposed solutions that you feel have not been adequately captured in today's discussion?

Open discussion:

- **An EU agency** raised the issue of partner countries and how they might react to the establishment of such a system, as well as their views on its design and implications. In response, the **Contractor** clarified that a number of partner countries had been consulted through targeted interviews and had provided input, both on the problem definition and on the proposed solutions. The analysis presented was described as being supported by this evidence.
- **D The QA authority from Türkiye** reflected on the perspective of third countries, noting that despite existing connections with the European Union, there remains a significant gap in awareness among students, graduates and vocational learners regarding

pathways to employment in Europe. A lack of clear information was identified as a key barrier, particularly in understanding requirements, available opportunities and the steps needed to access the European labour market. The issue was framed less as a lack of transparency and more as an absence of accessible and structured information about existing pathways.

- **The QA authority from SI** expressed agreement with the point raised by Donald Staub and emphasised the broader relevance of developing a more uniform system. The importance of creating a framework that is transparent, clear and workable across contexts was highlighted, in light of increasing global mobility. Such a system was seen as having the potential to serve as a benchmark beyond Europe, offering a model for other regions.
- **An IO** noted ongoing coordination at international level, including collaboration involving UNESCO and engagement with quality assurance networks. Efforts were described as focusing on strengthening the recognition of qualifications and ensuring that this dimension is adequately addressed within broader developments. The overall direction of work was characterised as progressing positively.
- **An EU agency** reflected on personal experience with recognition procedures, highlighting issues related to predictability, access to information and traceability. Instances were mentioned where recognition decisions were not formally documented or communicated to the individual concerned. Attention was also drawn to the presence of misinformation in countries of origin. In the case of Armenia, for example, a perception was described whereby qualifications, particularly in medical education, are believed to be automatically recognised in Europe, despite this not being the case. This was identified as an area where clearer communication and information provision could be beneficial, including guidance on recognition procedures and ways to verify the status of qualifications.

Annex 17.7.6 Closing remarks

The **Contractor** thanked participants for their attendance and provided an overview of the ongoing activities in the context of the Study under Action 3.

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