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IMPACT ASSESSMENT REPORT

Accompanying the document

Proposal for a

**DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL
on the recognition of qualifications of third-country nationals**

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Glossary

Term or acronym	Meaning or definition
CA	Competent Authorities
CSO	Civil society organisations
EQF	European Qualifications Framework
ETF	European Training Foundation
HR	Human Resources
IA	Impact Assessment
ICT	Information and communication technology
IO	International organisation
IOM	International Organisation for Migration
MRA	Mutual Recognition Agreement
MS	Member State(s)
OECD	Organisation for Economic Cooperation and Development
PC	Public Consultation
PO	Policy Option
PQD	Professional Qualifications Directive
QA	Quality Assurance
SMEs	Small and medium-sized enterprises

TCN	Third-country nationals
TCQ	Third-country qualifications

Note on terminology

In this impact assessment (IA), the expression “recognition of qualifications” refers to two distinct but related sets of procedures.

In relation to regulated professions¹, e.g. doctor, nurse, electrician, (“recognition of professional qualifications”), it refers to the process by which a person’s qualifications are assessed and verified by a competent authority (CA) to determine whether they meet the legal requirements to grant that individual the right to practice the profession in that Member State (MS).

In the context of migration policy, “recognition of qualifications” refers to the process by which a person’s qualifications are assessed as part of a procedure to grant residence in that MS.

While recognition of professional qualifications by a CA grants the legal right to practice a specific regulated occupation, migration-related recognition functions as an entry filter to verify that an applicant’s qualifications meet the thresholds required for admission into the domestic labour market.

Professional and migration-related recognition procedures can intersect when the legal migration pathway itself is legally contingent upon the applicant already holding the right to practise a regulated profession within the host Member State.

The problem analysis distinguishes between “recognition systems” and “recognition procedures”. The former refers to the recognition governance and operational structures in MS (which authorities are involved, which assessment methods are applied and for what purpose is recognition required?). The latter refers to the various steps in the administrative handling of recognition requests (what documents are required, which deadlines apply, etc.?) within these “recognition systems”.

¹ The expression “regulated profession” refers to a professional activity or group of professional activities the access to and/or the pursuit of is subject to the possession of specific professional qualifications by virtue of regulatory or administrative provisions

1. INTRODUCTION: POLITICAL AND LEGAL CONTEXT

1.1. Overall context of the Skills Portability Initiative and the Fair Labour Mobility package

While the EU's labour market has reached **record-high employment levels** and shown remarkable resilience in the post-pandemic era,² its strong performance masks a structural challenge: **widespread skilled labour shortages** that threaten business growth and the EU's global competitiveness.³

Critical sectors – ranging from healthcare and ICT to construction and transport – struggle to find the talent they need to scale up and drive the twin transitions. These shortages are structural, not cyclical, and expected to worsen due to demographics and evolving demand for new skills and occupations.⁴ They are not evenly distributed across the economy and **most acutely felt by Small and Medium-sized Enterprise (SMEs)**, which have fewer resources to navigate complex recruitment channels⁵. Labour and skills gaps also threaten the delivery of essential public services like healthcare, education and long-term care.⁶

Paradoxically, the EU also suffers from 'skills waste'. **Overqualification and the underutilisation of skills** remain structural features of the labour market. This mismatch is significantly more pronounced among EU mobile workers and third-country nationals (TCN)⁷.

Uncertainty about whether **qualifications and skills** will be **fully understood, valued, and formally recognised** (in the case of regulated professions⁸) **in another MS**, may discourage

² The employment rate for people aged 20-64 equalled [76.3% in the Q1 of 2026](#).

³ With minor fluctuations, labour market slack in the EU has been decreasing steadily from 18.6% in 2015 to 10.9% in Q1 2026 while the [job vacancy rate in the EU stood at 2.0% in Q4 2025](#). While this represents a slight dip from previous peaks, it signals an enduring difficulty for employers to find the right talent to sustain growth. Structural factors, such as demographic change and skills demands from the twin transition, as well as poor working conditions in some sectors are likely to sustain shortages in the foreseeable future.

⁴ The EU's working-age population is projected to shrink from 265 million in 2022 to 258 million by 2030 ([ESDE 2023](#), based on Eurostat EUROPOP2023 projections), while job vacancy rates have more than doubled over the past decade. [Cedefop's skills forecast to 2035](#) further confirms that in key shortage sectors — health, care and construction — shortages stem primarily from replacement demand.

⁵ 51% EU firms reported that the scarcity of skilled workers was a major barrier to investment in 2024 – up from 38% in 2016. [EIB 2024/2025](#). A [2026 Eurobarometer survey](#) shows that 46% of SMEs are finding it difficult or very difficult to finding staff with the right skills over the past 24 months. For SMEs, the inability to recruit has immediate consequences. [In an earlier survey](#), 48% of them reported that shortages lead to an increased workload for existing staff, directly impacting productivity and the ability to innovate.

⁶ According to the OECD, in 2022, the EU faced a shortfall of 1.2 million health professionals, with shortages reported by 20 MS for doctors and 15 for nurses. The crisis is driven by an ageing population increasing demand while over one-third of doctors and a quarter of nurses approach retirement. This trend is expected to worsen, causing a projected shortfall of around 2 million health and long-term care workers by 2030, with demand continuing to grow thereafter due to ageing populations. Cf. OECD (2024) and [European Commission \(2021\)](#).

⁷ In 2024, there were 14 million European citizens living in another EU MS, of which 10.1 million of working age. In addition, there were 1.9 million cross-border commuters. In 2024, 12.8 million non-EU citizens were employed in the EU in 2025. Cf. European Commission (2026), Eurostat LFS 2025. The overqualification rate among EU workers employed in their own country stood at 20.8% in 2023. For mobile EU-citizens and TCN the equivalent rate equalled 31.4% and 39.8% respectively. Eurostat LFS, lfsa_eoqgan.

⁸ Regulated professions are the focus of Action 2 of the Skills Portability Initiative; the definition of the concept and its practical scope are explained in the accompanying IA.

professionals from seeking employment opportunities outside their MS.⁹ It can also deter companies, especially SMEs, from tapping into the potential pool of talent of the Single Market.

Beyond economic efficiency, **skills portability** is a prerequisite for exercising the fundamental rights enshrined in the Treaties, including the **right to free movement (Article 21 TFEU)**, the **freedom of movement for workers (Article 45)** and the **freedom of establishment (Article 49 TFEU)**. While individual decisions on relocating to another EU MS depend on many factors, limited skills portability contributes to difficulties that many citizens experience when exercising these rights. In border regions, skills-related barriers to mobility limit job opportunities in neighbouring countries which could be accessed without the need for relocation¹⁰. Improving skills portability across borders thus also contributes to the ‘right to stay’.

The **Letta report on the Single Market** to the European Council highlighted that: “*Free movement of people has been and remains the least developed of the four freedoms.*” It also stressed that fragmented national labour markets hinder European growth and competitiveness and that “*extending the system of automatic recognition of professional qualifications and reviewing the need for and extent of professional regulation would facilitate mobility and help to respond to persistent labour shortages.*”¹¹

In response, the **Political Guidelines of Commission President von der Leyen**, committed to a “*Skills Portability Initiative to ensure a skill acquired in one country is recognised in another.*”¹² They also underscored the need to “*support Member States and companies with legal migration based on the skills needs of our economies and our regions*” and to “*make it easier to attract the right talent with harmonised rules on the recognition of qualifications.*” At its meeting on 19 March 2026, the **European Council** urged swifter action, calling for measures to “*enhance free movement of workers by improving mutual recognition of professional qualifications and strengthening the portability of qualifications and skills across national borders, including through digitalisation and interoperability, on the basis of a Commission proposal to be presented by autumn 2026.*”¹³ On 24 April 2026, the European institutions agreed on a roadmap to achieve ‘**One Europe, One Market**’ to strengthen Europe’s competitiveness, with a commitment for concrete actions and targets for agreements by end of 2027. The Skills Portability Initiative is one of the **priority deliverables to contribute to a more integrated Single Market**.¹⁴

This political direction is supported by the broader institutional landscape. The **European Economic and Social Committee** has called for further discussions among governments, social partners, and stakeholders to consider expanding the list of automatically recognised regulated professions and creating common training frameworks under Directive 2005/36/EC,

⁹ In a recent Eurobarometer 18% of respondents indicated an interest in working abroad, higher than the actual number of mobile workers. Cf. [European Commission \(2022\)](#).

¹⁰ [ITEM study on challenges and solutions for recognising professional qualifications in cross-border regions](#).

¹¹ [Letta](#) (2024).

¹² [Von der Leyen](#) (2024).

¹³ [European Council meeting \(19 March 2026\) – Conclusions](#)

¹⁴ [One Europe, One Market Roadmap of the European Parliament, the Council of the European Union and the European Commission](#)

addressing barriers to its implementation.¹⁵ The **Committee of the Regions** has highlighted the importance of enhancing the portability and recognition of qualifications across the EU, which are essential for fostering labour mobility, combating brain drain and fully harnessing the Single Market and talent within regional economies.¹⁶

As part of the **Fair Labour Mobility package**¹⁷, the Skills Portability Initiative aims to empower European businesses to recruit the skilled labour force they need to remain competitive in the global economy, effectively safeguard the right to free movement and allow talent to flow seamlessly to where it adds most value. By simplifying and improving the transparency of recognition, and validation, the initiative strengthens coherence between migration pathways, labour market needs and skills systems; supporting improved labour market matching, enhanced productivity and reduced skills underutilisation across the EU.

The initiative aligns with the **2030 Agenda for Sustainable Development**, in particular SDG 8 (Decent work and economic growth), SDG 9 (Industry, innovation and infrastructure), SDG 10 (Reduced inequalities) and SDG 1 (No poverty).

1.2. Coherence of the package

Underemployment, overqualification and ‘skills waste’ stem inter alia from **imperfect information** and **regulatory or administrative barriers to free movement**. Mobile professionals struggle to valorise the qualifications and skills they acquired abroad because labour market actors find it relatively more difficult to interpret and verify non-national credentials. This puts qualifications and skills acquired in a non-national context at a disadvantage. The Skills Portability Initiative aims to address these barriers through a set of **three distinct but interrelated actions**:

Action 1: Improving availability of reliable, comparable and verifiable digitalised information on qualifications and skills in the EU

This action aims to bring simplification for employers and workers by making qualifications instantly understandable and verifiable for labour market actors across the Single Market, and facilitating comparison of the level and content of qualifications issued in the EU. It aims to do so by building on existing tools such as the European Qualifications Framework, Europass and the European Digital Identity Wallet, and through setting common standards for digital attestations of qualifications to be interoperable, secure, and machine-readable. This will reduce the ‘interpretative burden’ on hiring managers, and prevent further fragmentation between MS resulting from uncoordinated investments in digitalisation.

This action is relevant for all workers using qualifications obtained in other EU MS in any labour market context, including for access to regulated professions. In the context of unregulated professions, which constitute 78% of EU labour force, the improved availability of digitalised and comparable information on qualifications and skills will contribute to decreasing the uncertainty about how to treat qualifications obtained in another MS, which at the moment

¹⁵ [SOC/837-EESC-2025](#)

¹⁶ [CDR-1105-2025](#)

¹⁷ For more context, see CWP 2026 [Commission work programme 2026 - European Commission](#).

leads employers to request costly and time-consuming comparisons with national qualifications even though these are not legally required. In regulated professions, the digital attestations set up thanks to Action 1 are a key element of the simplification of the recognition procedures under Action 2. The various problem drivers, Policy Options and impacts are discussed in this IA.

Action 2: Targeted Intervention for Regulated Professions

The second action focuses specifically on improving cross-border recognition procedures for access to regulated professions.¹⁸ There are currently over 5,700 professions regulated across the EU¹⁹ covering an estimated 22% of the labour force²⁰, with considerable variations in how these professions are governed and diverging access requirements between MS. This exacerbates the issue of allocative inefficiency as imperfect information is compounded by legal and administrative hurdles to skills mobility. Under the TFEU, regulation of access to professions is MS competence within the limits of EU law, and in particular, non-discrimination and proportionality²¹. Consequently, there is a high variety of approaches to regulating the access to professions between MS which creates barriers to professional mobility within the EU. To address those barriers, the EU has established the Professional Qualifications Directive²² (PQD) which provides a robust, legally binding framework that sets out rules on the recognition of professional qualifications in a cross-border context. Thus, the Directive facilitates professional mobility, ensuring that individuals who have acquired their professional qualifications in one MS for access to a given profession, can access and pursue the same profession in another MS under the same conditions as nationals. However, the experience of professionals navigating the existing regulatory framework reveals that recognition often remains a complex and time-consuming process. While the framework's foundations are fundamentally sound, lengthy procedures, uneven digitalisation of national processes and procedures, and heavy documentation requirements risk undermining its potential. Action 2 aims to facilitate cross-border recognition of professional qualifications required to access regulated professions and is organised into two primary work strands. The **first work strand** focuses on applying the automatic recognition system to additional regulated professions. Currently, automatic recognition exists for certain sectoral professions with harmonised

¹⁸ Article 3 of the Professional Qualifications Directive defines a regulated profession as “*a professional activity or group of professional activities, access to which, the pursuit of which, or one of the modes of pursuit of which is subject, directly or indirectly, by virtue of legislative, regulatory or administrative provisions to the possession of specific professional qualifications.*”.

¹⁹ According to the ECA, the combined data on professions that are regulated in the MS show that the total increased from around 5 400 in 2016 to around 5 700 in 2023 (average per MS: 212 regulated professions). Annex 8 of the IA accompanying Action 2 of the Skills Portability Initiative provides more background on regulated professions in the MS, for illustrative purposes. The European Commission's RegProf allows to verify which professions are regulated at national level in the EU, by MS.

²⁰ See COM (2016) 820 final.

²¹ Directive (EU) 2018/958 on proportionality tests obliges MS to assess, before adoption, whether new or amended regulation of professions is justified, necessary, and proportionate to legitimate public-interest objectives, and to document this assessment transparently: by doing so, it indirectly supports recognition by reducing barriers and promoting consistency across MS.

²² [Directive 2005/36/EC of the European Parliament and of the Council of 7 September 2005 on the recognition of professional qualifications](#). The PQD, based on articles 46, 53(1), 53(2) and 62 TFEU is part of a broader acquis governing the free movement of professionals. The links between the PQD and other instruments on the free movement of professionals in the Single Market are explained in more detail in Annex 7.

minimum training requirements (such as doctors and nurses). For specific economic activities in trade and commerce there is automatic recognition based on professional experience. The action aims to extend automatic recognition to professions which are not currently covered using Common Training Frameworks. It is covered as part of the baseline in the dedicated IA for action 2.²³ The **second work strand** on Modernisation and Digitalisation of Procedures aims to simplify and speed up recognition of professional qualifications for regulated professions, by streamlining the existing recognition procedures under the Directive, leveraging the potential of digital tools. Action 2 is based on articles 46, 49, 53 and 62 TFEU. The various problem drivers and Policy Options in this second work strand are discussed in a dedicated IA.

Action 3: Attracting and Empowering Global Talent

Acknowledging that intra-EU mobility alone cannot solve all labour market needs, Action 3 focuses on making the Single Market a more attractive destination for TCN by enabling them to have their qualifications recognised and their skills validated more easily. This will both benefit the TCN already residing and working in the EU and those who intend to migrate to the EU, making the Single Market a more attractive destination for global talent. Action 3 is based on article 79 (2) points (a) and (b) TFEU. The various problem drivers and Policy Options in this third work strand are discussed in this IA.

Actions 1, 2 and 3 are closely interlinked and coherent.

The interoperable, secure and verifiable digital attestations developed under **Action 1** are a foundation, on which actions to simplify and speed up recognition procedures in the context of regulated professions under the PQD (**Action 2**) build, by reducing administrative burdens on Competent Authorities enabling smoother, faster assessments of qualifications.

Action 3 addresses a critical gap: the PQD's recognition procedures **do not cover third-country nationals (TCNs)**. TCNs and EU citizens holding non-EU qualifications do not always benefit to the same extent from the existing EU transparency tools. This puts them at a disadvantage compared to EU citizens holding EU qualifications, undermining the attractiveness of the Single Market as a destination for global talent. To address these issues, specific action to facilitate recognition of qualifications of TCN is warranted. This is the purpose of Action 3. Just like Action 1, Action 3 uses the European Qualifications Framework as a key tool to enable comparability and portability of qualifications across borders, implemented in particular through comparisons between the EQF and qualifications frameworks of third countries, such as in the context of Talent Partnerships, or other EU partnerships.

Together the three actions form a coherent package, each addressing distinct but interlinked dimensions of skills portability: 1) the framework for availability of digitalised information about qualifications and skills which forms the foundation for the other actions, 2) the recognition of qualifications for intra-EU mobility in regulated professions, and 3) the recognition of qualifications of TCN. As such, the three actions are mutually reinforcing and

²³ The link between this strand of work and the modernisation and digitalisation of recognition procedures is explained in Annex 9 of the relevant IA.

contribute to the broader objectives of supporting labour mobility, reducing skills mismatches, and improving the functioning of the Single Market.

2. PROBLEM DEFINITION

The primary scope of this action is TCN seeking employment in the EU.²⁴ The focus on TCN (rather than TCQ) is due to Treaty legal basis, as well as existing EU acquis, that require any EU intervention in this area to be framed around the personal scope, i.e. focused on TCN and their rights (discussed in Annex 8).

The action addresses recognition procedures, not migration flows. It does not alter Member States' competence to determine admission conditions, set migration volumes or decide which professions they regulate. Legal migration is a necessary component of the EU's long-term response to demographic decline²⁵, a context within which this action operates exclusively through procedural improvement. Where relevant, the IA has regard to ethical and geopolitical dimensions of talent mobility, including the potential impact on origin countries facing documented workforce pressures.

The recognition landscape facing TCN involves two distinct types of procedures which are organised differently across 27 national systems.

The first is formal recognition for access to a regulated profession. Where a TCN seeks to practise a regulated profession, such as medical doctor, nurse, electrician, recognition is a mandatory legal precondition for access to professional practice²⁶. No TCN may practise a regulated profession in a Member State without first obtaining a formal recognition decision from the relevant authority. This decision involves a substantive assessment of the applicant's qualifications against the national requirements for the profession concerned, may require the submission of extensive documentation and may result in the imposition of compensation measures²⁷ before recognition is granted.

²⁴ The IA also considers two further scenarios arising from the legal analysis for the action: TCNs who hold qualifications obtained in another Member State, and EU nationals who hold third-country qualifications. These scenarios are described in more detail in the Annex 8 description of the legal context. The scenarios do not alter the central analysis, and they do not change the principal focus of this action, which is the absence of any EU framework governing recognition procedures for TCNs.

²⁵ The Commission's 2025 Strategic Foresight Report

²⁶ The qualification requirement can also be linked a particular mode of pursuit, e.g. using a professional title or working in a self-employed capacity. See the definition of "regulated profession" in Art. 3(1)(a) of Directive 2005/36/EC on the recognition of professional qualifications.

²⁷ Under the PQD (which applies to EU citizens), if a host EU country finds substantial differences between an applicant's professional qualifications and their national requirements, they may impose compensation measures. Applicants are generally given the choice between two options: an adaptation period or an aptitude test. No equivalent framework governs compensation measures for TCNs. In the absence of EU legislation, MS and CAs determine independently whether compensation measures apply, in what form, and on what terms, resulting in significant variation in both the nature and extent of the requirements imposed on TCN applicants for the same profession across different national and regulatory contexts.

Unlike EU nationals moving between MS, who benefit from established mutual recognition mechanisms under PQD (including automatic recognition for seven sectoral professions²⁸) TCN have no comparable framework for accessing regulated professions. This gap is particularly acute in healthcare precisely where TCN migration flows are most concentrated²⁹. Nearly half of TCN who initiated recognition procedures in the EU were seeking access to a regulated profession in healthcare³⁰.

The second type of procedure is a qualification or skills check conducted as part of a migration procedure. Several admission pathways, including the Blue Card, researcher visa and national highly skilled worker schemes, require applicants to demonstrate that their qualifications meet defined thresholds as a condition of entry or residence, irrespective of whether the profession they intend to practise is regulated or unregulated³¹. These checks are conducted by MS authorities under the legal framework applicable to the admission pathway, and are distinct in purpose, institutional setting and legal basis from the procedure conducted by CA. Their function is to establish eligibility for admission rather than to authorise access to a specific profession.

TCN already make a substantial and growing contribution to EU labour markets. Over the past decade, **the share of the working-age population in the EU born in a third-country** has consistently increased, reaching **12.6% in 2024**, compared to approximately 8% in 2014. By contrast, the share of working-age people born in one MS but living in another rose only modestly, from 4% in 2014 to 4.4% over the same period³². Employed TCN have particularly strong presence in sectors facing acute labour shortages, including health and long-term care, ICT, construction and engineering. Yet, despite available opportunities, OECD analysis shows that Sweden is the only MS among the top five preferred destinations for highly skilled workers³³; that TCN tend to favour destinations such as the United States, Canada, Australia and New Zealand.

Several MS have adopted dedicated talent attraction strategies, encompassing fast-track admission pathways, and targeted visa schemes³⁴, sometimes incorporating solutions for recognition barriers.³⁵ The issue underpinning talent attraction is not one of a need to increase migration flows but to deepen the pool of candidates who consider the EU a viable destination. A larger interested pool, even with unchanged admission volumes, improves the quality of selection available to MS and employers.

²⁸ The PQD has introduced minimum training requirements for a total of 7 professions: doctors, nurses responsible for general care, dental practitioners, veterinary surgeons, midwives, pharmacists and architects.

²⁹ OECD (2019)

³⁰ 46.8% of TCN survey respondents declared a regulated healthcare profession, and administrative data record 23,500 medical doctor recognition applications from TCNs across 11 Member States in 2023 alone.

³¹ See Annex 9 Mapping of recognition procedures - Qualifications and Skills Checks with migration pathways

³² European Commission (2025c).

³³ OECD (2023).

³⁴ EMN–OECD, Inform on innovative strategies to attract foreign talent in the EU Member Countries, February 2025. Since 2021, 15 EMN Member Countries have introduced new or innovative approaches, including dedicated national talent strategies (Denmark, Estonia, Finland, Netherlands), sector-specific fast-track pathways (Germany, Portugal) and active international recruitment programmes

³⁵ See Annex 9 (a) (i) Cooperation — within Member States, between Member States, and with third countries

The EU has developed an ecosystem of instruments designed to attract, match and recruit talent beyond its borders including the EU Talent Pool connecting third-country jobseekers with EU employers, Talent Partnerships with priority non-EU countries building structured labour mobility pathways, the European Legal Gateway Office pilot in India, and EU legal migration directives³⁶. These instruments reflect a strategic goal, articulated in the Union of Skills³⁷, to make the EU a competitive destination of choice for skilled workers in the global race for talent, in which other major economies offer faster, more predictable and better-understood pathways. This ambition is reinforced by a Visa Strategy aimed at streamlining procedures for top students, researchers and trained workers³⁸, a Commission Recommendation on attracting talent for innovation³⁹ advocating simpler and faster procedures for long-stay visas and residence permits, and the Action Plan on Integration and Inclusion⁴⁰, which specifically identifies recognition of qualifications as a lever for improving labour market participation for people with a migrant background

Across this ecosystem, the ability of TCN to have their qualifications recognised in a way that is simple, trusted and effective remains structurally underdeveloped at both EU and national level. Therefore, this action focuses on recognition as a **distinctive procedural requirement**. Recognition has direct consequences for employers and workers, and impacts the effectiveness of instruments to attract, match and recruit talent. Challenges associated with recognition, described in the next section, operate at both EU and national level and addressing these is therefore both an EU and national priority.

Finally, the decision of a TCN to seek employment in the EU is shaped by a broad set of factors, including employment opportunities, working conditions, career prospects, cultural and linguistic affinities, language barriers, access to integration support, housing and social infrastructure, and general quality of life.⁴¹ Available survey evidence typically captures these motivations at a high level of aggregation, under headings such as work or family, within which procedural factors such as recognition are embedded rather than separately identified, and it is inherently difficult to estimate the share of potential migrants for whom the EU is a candidate destination. The magnitude of the recognition problem cannot therefore be analytically isolated from the other determinants of destination choice with statistical precision. What the evidence does establish is that recognition acts as a critical enabling factor shaping the indicators highlighted in the OECD Indicators of Talent Attractiveness, such as the quality of opportunities, income and future prospects, and that it is the determinant most amenable to EU-level regulatory action. Whereas language, integration and social infrastructure require long-term national investment and are addressed through complementary EU instruments, including the EU Talent Pool, Talent Partnerships and the Action Plan on Integration and Inclusion, the fragmentation of recognition procedures is a regulatory problem that EU legislation can target

³⁶ See Annex 8 for an overview of existing EU instruments to attract, match and recruit talent.

³⁷ Union of Skills, COM (2025).

³⁸ [Commission adopts a first-ever EU Visa Strategy](#)

³⁹ [Commission Recommendation \(EU\) 2026/311 of 29 January 2026](#)

⁴⁰ [Action plan on integration and inclusion 2021 - 2027](#)

⁴¹ The [OECD Indicators of Talent Attractiveness](#) include 7 dimensions which impact capacity of a country to attract and retain different types of talented migrants: (1) quality of opportunities, (2) income and tax, (3) future prospects, (4) family environment, (5) skills environment, (6) inclusiveness, and (7) quality of life and (8) health system performance.

directly. The focus on recognition is therefore the specific contribution of this action within the EU's broader talent attraction strategy, not a claim that recognition is the sole or principal driver of mobility. Moreover, the magnitude of the problem does not rest on the migration decision alone, since improved procedures would directly benefit the substantial population of TCN already present in EU labour markets and working below their qualification level, for whom the barriers documented in this chapter apply in full.

2.1. What is the problem?

The procedures for the recognition of qualifications and validation of skills for TCN wanting to work in the EU are complex, burdensome, and untransparent, leading to uncertain and even inconsistent outcomes.

Whether already residing in a MS or seeking to migrate, TCN face a landscape for recognition of qualifications impacted by three interconnected problems: divergent national systems; complex and burdensome procedures; and lack of trust and understanding in third-country skills and qualifications.

Divergent national systems: The TCN applicant navigates a recognition procedure that may take years, in a country where their continued legal presence depends on its outcome. Where a TCN seeks to practise a regulated profession through a migration pathway that carries qualification criteria, both types of procedure may apply: a qualification check by the migration authority as a condition of admission, followed by a separate formal recognition procedure before the CA as a condition of access to professional practice. These two procedures operate under different legal frameworks, involve different authorities and run on different timelines which compounds the burden on individuals and generates a level of uncertainty that cannot be addressed by individual Member State action alone.⁴²

Complex and burdensome procedures: Beyond system level complexity, TCN face recognition procedures that are in practice costly, time-consuming and administratively demanding regardless of the pathway or profession concerned. The average total cost is estimated at EUR 1,500 per application and the average actual duration at 14.2 months, with 70.4% of TCN⁴³ surveyed considering the length of the process either a 'big' or a 'very big' problem. A further EUR 300 in administrative costs applies to migration-related recognition procedures that do not involve a regulated profession, affecting a comparable annual volume of applications.

Lack of trust and understanding in third-country skills and qualifications: Recognition outcomes also depend on whether the authority conducting the assessment has sufficient knowledge and confidence to evaluate what a third-country qualification represents. National authorities and employers frequently lack familiarity with third-country curricula, quality assurance frameworks and documentation practices, generating caution, additional verification

⁴² Focus Group with individual TCNs (FG6, n=12); Public Consultation TCN responses (Annex 2). Quantitative corroboration: TCN survey and PC data show that 22.6% of individuals who completed recognition procedures reported total durations of between six months and three years; business organisations and CSOs reported timelines ranging from under one month to two to three years

⁴³ TCN Survey, Q8 (n=253)

burdens and inconsistent outcomes. Addressing this information asymmetry is therefore a necessary condition for removing the barriers TCN face.

2.2. The scale of the problem

The IA draws on an **extensive body of desk research, primary fieldwork, statistical data as well as secondary literature** to build a comprehensive evidence base and to triangulate findings across sources. This includes a mapping of recognition procedures across all 27 MS, covering both procedures for access to regulated professions and qualification checks conducted as part of migration procedures, which describes the authorities involved, the documents required, the typical timelines, the fees charged and the degree of coordination between recognition and migration systems (see Annex 9). Nevertheless, important **data limitations** remain. No regular EU-wide data collection exists on qualification recognition procedures and the full extent of barriers for TCN. This gap is itself a product of the divergence of national systems. Accordingly, surveys and focus groups were used to capture the volume of procedures and the lived experience of TCN as systematically as possible. Taken together, these sources provide a sufficient evidence base for the assessment and enabled the identification of a set of key indicators, introduced below, which form the analytical thread running through the issues assessed in this IA.

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 TCN were employed in the Union, up from 8.7 million in 2020 and representing 6.4% of the total employed workforce. In 2024 alone, approximately 1.1 million TCN 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 Card, the researchers visa and the national highly skilled migration pathways require proof of a verified education degree or equivalent upper-level 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 utilised 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 action.

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, this IA relies 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.

The problem identified above has distinct implications for different stakeholders.

For TCN applicants who are already residing in the EU, the bottlenecks are well documented. Successive studies⁴⁴ highlight that TCN identified recognition procedures as the main obstacle to securing employment that matches their skills. Within the area of regulated professions, 73 out of 182 TCN professionals who had considered seeking recognition reported that they had not done so due to the complexity, cost or duration of the process — with a further 16 out of 152 of those who initiated a procedure subsequently withdrawing for the same reasons.⁴⁵ Overqualification among TCN remains significantly higher than among nationals: in 2023, 39.8%⁴⁶ of TCN in the EU were overqualified, compared with 20.8% of nationals. While overqualification does not in itself measure unsuccessful recognition procedures, it is a strong indicator that skills are not being effectively translated into labour market outcomes. Recognition of qualifications is associated with better labour market outcomes: TCN with recognised qualifications have lower unemployment rates compared to those without (16% vs 22%), and a similar pattern can be observed in labour market participation.⁴⁷ Among tertiary-educated TCN, participation reaches 81% for those with recognised qualifications compared with 74% for those without, pointing to a significant gap in labour market integration. Differences are less pronounced at medium education levels, but still present (79% vs 77%). The effect of improving recognition systems on these outcomes is empirically well-documented. Germany's Federal Recognition Act, which introduced a legal basis and standardised procedures for equivalency assessment, increased employment probability in regulated occupations for non-EU immigrants by 18.6%, rising to 25.1% in professions with large application pools such as nursing and medicine.⁴⁸ OECD data confirms that host-country qualification recognition reduces the overqualification gap with native-born workers by 75% on average across the EU⁴⁹.

For **young TCN**⁵⁰ in the EU labour market, qualifications serve as the primary signal of competence available to employers and authorities yet they suffer particularly from overqualification⁵¹. High procedural costs and lengthy, opaque procedures act as a regressive barrier that disproportionately affects young, low-wealth applicants who lack the financial buffers needed to sustain extended recognition processes or fund compensatory measures.

Taken together, this suggests that barriers to recognition and validation contribute to weaker labour market integration and to less efficient allocation of skills. These effects are particularly problematic for sectors facing acute labour shortages, such as healthcare, where the underutilisation of available skills directly affects public service provision and economic

⁴⁴ European Parliament (2019); EPRS (2023)

⁴⁵ TCN Survey and Public Consultation TCN sub-sample (pooled n=182); TCN Survey (n=152 reporting a procedural outcome).

⁴⁶ European Commission (2024)

⁴⁷ Eurostat [lfsa_eoqgan]; EU Talent Pool IA background data.

⁴⁸ Anger, S., Bassetto, J. and Sandner, M., Making Integration Work? Facilitating Access to Occupational Recognition and Immigrants' Labor Market Performance, IAB Discussion Paper, 2022

⁴⁹ OECD/European Commission, Indicators of Immigrant Integration 2023

⁵⁰ In 2023, young non-EU citizens accounted for 11.9% of the EU population aged 15 to 29, a share that has followed an upward trend since 2014, [Eurostat](#).

⁵¹ In Czechia and Malta, overqualification rates for non-EU citizens aged 20–34 exceeded 50%, compared with under 15% for nationals. Among non-EU-born individuals aged 20–34, notably high overqualification rates were also recorded in Greece, Latvia and Czechia in 2024, [Eurostat](#).

growth⁵². TCN facing prolonged barriers to employment are also at risk of taking up undeclared or informal employment⁵³, a point highlighted in the Social Partners Hearing for the SPI⁵⁴. So too, employers in shortage sectors may recruit informally rather than navigate compliance requirements. Construction, accommodation, food services, care and manufacturing are the sectors most exposed to illegal employment of TCN.⁵⁵ The care sector is particularly significant, with an estimated 6.8 million undeclared workers across the EU, with qualified nurses and care professionals from third countries being disproportionately represented.⁵⁶ Beyond the economic consequences, the persistence of overqualification and prolonged inactivity during recognition procedures weakens economic independence of TCN⁵⁷, increases reliance on social support, and creates distance between TCN and the communities in which they reside⁵⁸.

For prospective migrants, these procedures create structural obstacles for attempting to access the EU labour market from abroad. Complicated or absent pre-departure recognition frameworks can act as a deterrent, discouraging highly skilled professionals from applying to EU migration pathways in the first place. The pre-departure deterrence factor is inherently difficult to quantify as individuals who are deterred never enter the national permit or application statistics, but **it is no less real or impactful in undermining the EU's global talent attraction.** The economic consequence of this deterrence is not a reduction in the number of TCNs admitted, as admission volumes remain a Member State decision - but in the smaller pool of qualified/skilled migrant workers available to strengthen the EU economy.

For employers, and SMEs in particular: Employers face uncertainty when assessing qualifications and skills acquired in third countries and often lack the resources needed to navigate fragmented procedures, verify documentation or absorb the delays linked to recognition processes. This reduces incentives to recruit from outside the EU, even where shortages are severe. EU-level evidence indicates that only 1 in 7 SMEs have attempted to recruit a non-EU worker within the EU in the previous 2 years⁵⁹ and that recognising foreign qualifications remains a significant obstacle. During stakeholder consultations, employers reported that recognition procedures are often time-consuming and difficult to navigate, and that the absence of predictable timelines significantly complicates workforce planning, leading

⁴³ ELA (2024); EMN (2024). In healthcare, nurse shortages are reported across 78% of EU countries and specialist medical shortages across 75%; 46.8% of TCN recognition applicants hold qualifications in this sector.

⁴⁴ EMN Study on Illegal Employment of Third-Country Nationals (2025); Eurofound (2025), Undeclared work in the EU. The EMN Study identifies SMEs in construction, accommodation, food services, care and manufacturing as the sectors most prevalent in illegal employment of TCNs and notes that administrative obstacles are among the key challenges in preventive measures. Eurofound estimates approximately 6.8 million undeclared workers across the EU, predominantly women and often migrants.

⁵⁴ See Annex 2 Stakeholder Consultation

⁵⁵ EMN Study on Illegal Employment of Third-Country Nationals, 2025

⁵⁶ Eurofound, Undeclared Work in the European Union, 2025.

⁵⁷ OECD (2025).

⁵⁸ Van Enk & Bilgili (2022)

⁵⁹ Flash Eurobarometer 571 (December 2025) found that nearly half of all EU SMEs (46%) reported difficulty finding or recruiting staff with the right skills over the preceding 24 months, rising to 70% among SMEs actively hiring. Despite this, only one in seven EU SMEs (14%) had attempted to recruit TCN.7 Qualification recognition challenges were cited by 13% of recruiters as a specific barrier, and by 8% of non-recruiting firms as a reason for not attempting international recruitment.

to withdrawal of job offers, abandonment of international recruitment, hiring TCN applicants at assistant or lower-skilled levels instead of at qualification level.⁶⁰

The consequences of recognition barriers affect the **EU economy and the delivery of public services** at scale. The aggregate effect of skills underutilisation across the TCN workforce represents a structural drag on EU productivity. Where qualified professionals work in roles below their skill level, or remain inactive during lengthy recognition procedures, the productive value of their qualifications is lost to the economy for the duration of that period. The opportunity costs for applicants working below their qualification level or not at all while their recognition applications are processed is estimated at approximately EUR 300 million/year⁶¹. Beyond the direct productivity effect, the persistence of recognition barriers contributes to structural labour and skills shortages in sectors of critical public importance. In healthcare, where TCNs account for a disproportionately large share of recognition applicants and where nurse shortages are recorded across 78% of EU countries, recognition barriers translate directly into reduced capacity to staff hospitals and long-term care facilities. Similar dynamics are present in construction, where 31% of employers report that shortages are already constraining output, and in ICT and education, where sustained skills gaps undermine the EU's capacity to deliver on the green and digital transitions.⁶²

Recognition barriers **also carry social costs** that compound over time. Where TCNs face prolonged administrative uncertainty, the social distance between migrant communities and host societies widens. Prolonged inactivity reduces economic independence, increases reliance on social support and limits participation in civic and community life.⁶³ These effects weaken integration outcomes for a population that is both growing in size and increasingly central to the EU's capacity to sustain public services and economic growth in the context of demographic decline. Beyond the productivity effects set out above, this represents a waste of individual human capital and a constraint on social cohesion⁶⁴.

Validation of skills — a distinct challenge

Validation of skills of TCN presents a distinct set of challenges that cannot be analysed in the same terms as qualification recognition.

Unlike recognition, which follows structured, requirements-based procedures leading to a formal decision, validation is by nature flexible, local and context-dependent. There is no single methodology, no uniform process, and no comparable decision at the end. Validation may take the form of a structured assessment following the steps of the Council Recommendation on

⁶⁰ IOM Webinar with private sector stakeholders (See Annex 2)

⁶¹ Calculated on the basis of the share of applicants either not working or working below their qualification level during the procedure and the wage differential between qualification-matched and mismatched employment. See, Annex 4.5 (Level 3 — welfare-side estimation); TCN survey Q15 (n=152): 49.3% of respondents working below their qualification level during the procedure; wage proxy from Eurostat Structure of Earnings Survey. Reported as an order of magnitude consistent with its scenario-based and modelled nature.

⁶² ELA (2024), Labour shortages and surpluses in Europe; ESDE 2023

⁶³ The Commission's Action Plan on Integration and Inclusion 2021–2027 frames labour market inclusion of legally-residing TCN as key to social cohesion and emphasises that inclusion means ensuring qualifications are recognised so TCN can find jobs matching their aspirations, not merely any job.

⁶⁴ The OECD Indicators of Immigrant Integration (2023) confirm that overqualification represents a waste of human capital that generates lower motivation and undermines social integration.

validation⁶⁵, or be undertaken through an employer-led skills check, a portfolio review or a documented competence statement, depending on the setting.

Validation is not systematically available, for EU citizens or for TCN, and its use for TCN in employment remains highly fragmented and largely informal across MS. Where migration authorities conduct skills checks as part of admission procedures, these typically aim to verify the plausibility of qualifications or experience rather than to formally validate skills. Validation to access to regulated professions does not go beyond requiring MS to also take into account evidence of different forms of learning.⁶⁶

The analysis below focuses on recognition systems and procedures. Issues related to the validation of skills of TCN, which present a distinct set of challenges, are examined in Annex 10.

The problem definition and its magnitude are corroborated by the evaluative evidence available on the instruments governing legal migration to the EU, mapped instrument by instrument in Annex 8. The Fitness Check on EU Legislation on Legal Migration concluded that the *acquis* remained fragmented and had had a limited impact on the EU's ability to attract the skills and talent its economy needs.⁶⁷ The implementation report on the Single Permit Directive identified the recognition of qualifications obtained outside the EU as one of the practical problems affecting permit holders' access to the labour market.⁶⁸ The impact assessment underpinning the recast of the Blue Card Directive found that difficulties in obtaining recognition limited the attractiveness of the EU's flagship scheme for highly qualified workers.⁶⁹ These findings informed the New Pact on Migration and Asylum and the Commission Communication on attracting skills and talents, both of which committed the Commission to addressing the shortcomings identified, including the recognition of qualifications of TCN. This action is the legislative follow-through on that commitment and applies the 'evaluate first' principle by building on the evaluative record of the existing *acquis*. The experience of the PQD provides a further, comparative reference point. Its implementation record demonstrates that binding common procedural rules, applied across a wide range of competent authorities, can deliver predictable recognition outcomes at scale, and it is precisely the absence of any equivalent framework for TCN that the problem drivers set out below describe.

2.3. What are the problem drivers?

The underlying drivers relate to the divergence of national recognition systems, the complexity and burden of procedures for TCN, and the difficulties faced by authorities and employers in understanding and trusting qualifications and skills obtained in third countries.

⁶⁵ Council Recommendation of 20 December 2012 on the validation of non-formal and informal learning, [OJ C 398, 22.12.2012](#)

⁶⁶ Evidence of professional experience, training courses not forming part of a certificate or diploma, non-formal and informal learning, or lifelong learning

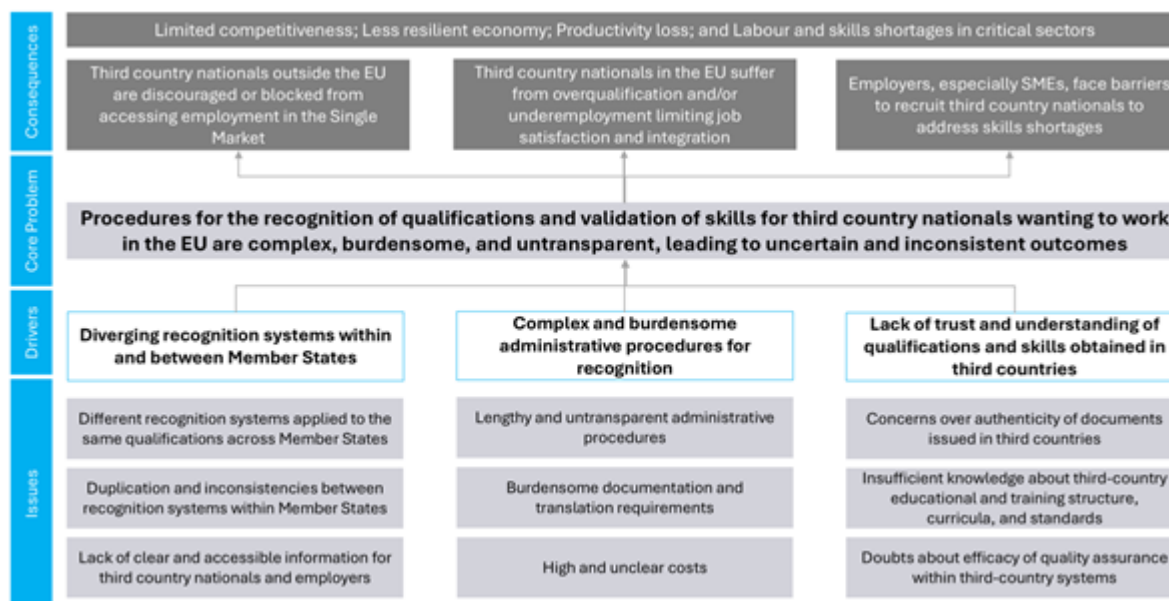
⁶⁷ Fitness Check on EU Legislation on Legal Migration, SWD(2019) 1055 final, 29 March 2019.

⁶⁸ Report on the implementation of Directive 2011/98/EU (Single Permit Directive), COM(2019) 160 final

⁶⁹ Impact assessment accompanying the proposal for the recast Blue Card Directive, SWD(2016) 193 final

The three drivers are mutually reinforcing. Because of diverging national systems (Driver 1), the same TCN faces different requirements, authorities and levels of scrutiny depending on which MS they apply in. Within each recognition system, complex and burdensome administrative procedures (Driver 2) add cost and delay. Adding to that is a persistent lack of trust and knowledge regarding third-country systems (Driver 3), which increases scrutiny requirements, amplifies documentation burdens and makes outcomes less predictable. Systemic divergence (Driver 1) reduces the ability to develop shared knowledge (Driver 3); the resulting knowledge gaps drive burdensome case-by-case procedures (Driver 2); and the burden of those procedures is amplified further by the absence of common standards (Driver 1).

SPI Action 3 Problem Tree



2.3.1. Driver 1: Diverging recognition systems within and between MS

Recognition systems for TCN are almost entirely governed by national legislation.⁷⁰ As a result, the same TCN may face very different requirements, procedures and outcomes depending on the MS concerned, the profession at issue and the authority responsible.

Sub-driver 1.1: Different recognition systems applied to the same qualifications across MS

Recognition systems differ substantially at structural level across MS in terms of the purpose of recognition, the legal framework and the authorities involved whether for regulated professions or where checks are done as part of migration procedures, or both. These systemic differences mean that the same TCN, with the same qualification, will encounter a fundamentally different recognition system depending on where in the EU they seek employment. This is particularly acute in regulated professions, where access to professional practice depends on formal recognition procedures and where the scope of regulation itself differs across MS. Even for the seven sectoral professions which are consistently regulated

⁷⁰ See Annex 8: Legal and policy context.

across all Member States, procedures vary. For example, for TCN medical doctors, the documents required⁷¹, the compensation measures applied⁷² and the assessment methods used vary substantially across MS. Such variation occurs not only across Member States but also within Member States where recognition is decentralised.⁷³ This is in clear contrast to the situation for EU citizens who can in the case of regulated professions benefit from clear procedural rules, under the PQD, including the system for automatic recognition for the sectoral professions, which obliges MS to treat approved qualifications from other MS in a consistent manner.

During consultation, MS public authorities raised the risk of TCN seeking first recognition in more flexible MS before moving elsewhere which can only be mitigated against by having minimum standards applied uniformly across the EU⁷⁴. This inconsistency contributes to uneven decision-making and legal uncertainty for applicants facing different outcomes for the same qualification depending on where they apply. This is an inherent structural weakness at a time when the EU is competing with other destination countries that offer faster, more predictable pathways to employment.

Sub-driver 1.2: Duplication and inconsistencies between recognition systems within MS

Within MS, competence for recognition are often scattered across different levels and bodies of government, including sector-specific boards for regulated professions, lacking a unified coordinating framework⁷⁵. Qualification checks that are conducted within recognition procedures and as part of migration pathways may run in parallel rather than sequentially or coherently⁷⁶. Across almost all MS, preliminary qualification checks for residence permits or visas are conducted by migration authorities, while formal recognition for access to a regulated profession is handled by a separate CA under different legal and administrative frameworks. This can lead to overlapping checks, repeated requests for the same documents, inconsistent guidance and multiple administrative steps for the same person.⁷⁷ These arrangements are particularly pronounced in decentralised governance systems.⁷⁸ In many MS, recognition bodies do not take into account prior qualification assessments conducted during migration

⁷¹ See Annex 9, Figure 7 - Overview of documents required for doctors across MS.

⁷² Under the PQD, if a host EU country finds substantial differences between an applicant's professional qualifications and their national requirements, they may impose compensation measures. Applicants are generally given the choice between two options: an adaptation period or an aptitude test. No equivalent framework governs compensation measures for TCNs. In the absence of EU legislation, Member States and competent authorities determine independently whether compensation measures apply, in what form, and on what terms, resulting in significant variation in both the nature and extent of the requirements imposed on TCN applicants for the same profession across different national and regulatory contexts. CA survey, Q28 (n=190)

⁷³ Regulation is decentralised in AT, BE, DE and IT. See Annex 9.

⁷⁴ In a targeted consultation with the Group of Co-ordinators for recognition of professional qualifications on SPI Action 3, RO supported by EE, IT, PT, CY, SK, HR, HU flagged the risk of TCNs seeking first recognition in more flexible MS before moving elsewhere. Minimum standards applying uniformly across MS are the primary design safeguard against this risk (See Annex 2).

⁷⁵ Bilateral MS meetings

⁷⁶ DG HOME/Kantar (2023)

⁷⁷ Focus Group with ENIC-NARIC centres, PES and CSOs (FG3, n=28); Public Consultation TCN responses (Annex 2)

⁷⁸ AT, BE, DE, IT

processes meaning TCN may undergo parallel and duplicative procedures under different institutional frameworks, each with its own timeline⁷⁹.

The dependence of migration status on recognition outcomes is a distinctive and compounding source of vulnerability for TCN that does not arise for EU nationals exercising free movement rights. Where recognition is a precondition for the issuance or renewal of a work permit, a delayed or unsuccessful recognition procedure translates directly into an inability to work, loss of income and, in the most serious cases, the prospect of forced return. In several MS, formal recognition is a legal precondition for the issuance of a residence permit, meaning that an unsuccessful or delayed recognition procedure directly determines whether the applicant's right to reside and work is granted or maintained⁸⁰. The IOM has noted in the public consultation (PC) that shortcomings in recognition procedures for TCN are magnified by their direct interaction with migration, visa and residence frameworks⁸¹.

Sub-driver 1.3: Lack of clear and accessible information for TCN and employers

Even though almost all Member States have some form of information mechanism in place for TCN on recognition procedures,⁸² these rarely provide comprehensive or detailed guidance on requirements, costs, timelines or expected outcomes.⁸³ Only a small number of Member States (AT, DE, FI, IT, NL, PT, SE) operate dedicated information portals specifically designed for TCN applicants. Several others provide general information through national websites, but these are rarely profession-specific, rarely updated when procedures change, and rarely available in languages other than the official language of the Member State.⁸⁴

TCN face particular difficulties in identifying whether a profession is regulated in the receiving Member State, and in determining which competent authority is responsible for recognition. The majority of TCN (154 out of 253) rely on official government websites as their primary source of information on recognition procedures.⁸⁵ Yet despite this reliance, 134 out of 253 respondents (53%) characterise the information those websites provide as only "somewhat clear", and a further 54 out of 253 (21.3%) describe it as "not clear at all". Taken together, 188 out of 253 TCN surveyed — nearly three quarters — report that the information available to them about recognition requirements is inadequate.⁸⁶

⁷⁹ Survey of CAs, Q33 (n=190). MS taking prior assessment into account: AT, BE, ES, FI, FR, IE, IT, LT, LV, NL, PL, PT, SE, SI.

⁸⁰ (CZ, NL, SK for the Blue Card pathway; BE, CZ, FR, HU, LT, PL, PT, SK, SE for sequentially structured migration routes more broadly)

⁸¹ IOM PC response

⁸² CA survey, Q10 (n=134); Annex 9, Section 8.6 (Availability of information for TCN and support for applicants). Almost all MS reported having at least one information mechanism, ranging from dedicated TCN portals to general national websites covering recognition alongside other immigration-related information.

⁸³ Focus Group on information and support to TCN (FG3, n=37, including ENIC-NARIC centres and PES from 18 MS and 2 EEA Members); PC TCN responses (Annex 2).

⁸⁴ The difficulty of identifying the responsible CA is particularly acute in decentralised governance systems (AT, BE, DE, IT) where recognition responsibilities are shared across regional bodies and sectoral regulators, and where the responsible CA for the same profession may vary across regions of the same MS.

⁸⁵ TCN survey, Q10 (n=253).

⁸⁶ TCN survey, Q11 (n=253).

Information on recognition procedures is frequently split between ENIC-NARIC centres, which hold expertise on academic qualification systems, CAs, and MA, who each operate under different legal mandates and often with limited coordination between them.⁸⁷ Focus group participants consistently described information on recognition procedures as fragmented, highly technical and dispersed across multiple institutional channels, with difficulties particularly pronounced in decentralised systems where responsibilities vary across regions.⁸⁸ See Annex 9 (a) (viii) for a full mapping of information availability and support mechanisms across Member States.

Employers, and in particular SMEs, encounter significant difficulties understanding and navigating recognition procedures.⁸⁹ In targeted consultations, employer bodies and HR departments consistently described recognition information as among the least transparent aspects of international recruitment, a finding corroborated by the public consultation where 199 out of 486 respondents across all stakeholder types reported difficulties in understanding and verifying foreign qualifications.

Driver 1 - EU instruments: No existing EU instrument imposes common rules on the design or systems of TCN recognition systems. Commission Recommendation EU 2023/2611 encourages simplification and greater consistency but, as a non-binding instrument, cannot establish procedural frameworks, meaning divergent systems remain in place. The PQD has established rules explicitly for EU citizens mobile in the EU. Where information is available at EU level, it is itself divergent in source and scope (e.g. Europass, EU Immigration Portal) which do not offer TCN a coherent picture of the recognition procedures in MS. The ENIC-NARIC network supplies comparability information that divergent systems need but cannot itself resolve that divergence. Further analysis of EU instruments is provided in Annex 8, Recognition-specific instruments.

2.3.2. Driver 2: Complex and burdensome administrative procedures for recognition

This driver explains why the procedural experience of applying for recognition is onerous for TCN, even where the appropriate route is known.

Sub-driver 2.1: Lengthy and untransparent procedures

The duration of recognition procedures is impacted by a number of factors. Recognition procedures take considerably longer than reported by CAs and the lack of transparency compounds burden for both TCNS and employers. For regulated professions, CAs report timelines that cover only the period from receipt of a complete application to decision, but pre-application requirements, document gathering, translation and legalisation mean the true experience of recognition for TCN is considerably longer. In addition, the duplication of

⁸⁷ Focus Group on information and support to TCN (FG3, n=37, ENIC-NARIC centres, PES and CSOs from 18 MS)

⁸⁸ Focus Group on information and support to TCN (FG3, n=37, ENIC-NARIC centres, PES and CSOs from 18 MS); Focus Group on labour migration with MAs and IOs (FG4, n=28); targeted interviews (2 CSOs, 2 IOs, 1 HR, 1 professional body, 5 TC authorities)

⁸⁹ PC, Q24 and Q25 (n=486); targeted interviews (2 EU employer bodies, 3 HR departments, 1 professional body); Focus Group on attracting talent (FG5, n=27).

procedures, due to the misalignment between recognition and migration procedures, described above in 1.2, intensifies delays as TCN may undergo parallel and duplicative procedures under different institutional frameworks and separate timelines⁹⁰.

In regulated professions, CAs report that only a small share of recognition procedures result in a formal decision within one month. In most cases, decisions are delivered between one and three months (65 of 190 CAs) or three and six months (58 of 190 CAs), with even longer timelines in fewer cases) (18 CAs reported duration of 6-12 months; 6 reported 1-2 years and 3 reported 2-3 years).⁹¹ In several MS⁹², access to recognition procedures is conditional on first obtaining a recognition statement from ENIC-NARIC centres, adding one to three additional months⁹³. Data from the TCN survey reveals a much lengthier reality: while 18.8% of respondents received a decision within one to three months, 36.3% indicated that the process dragged on for over a year.⁹⁴ Accounting for pre-procedure requirements and administrative delays, the estimated actual average duration of the full recognition process is approximately 14.2 months.⁹⁵

The available evidence does not allow for a precise baseline on the expected duration of **qualification and skills checks within migration procedures**.⁹⁶ An indicative timeline of 6-12 weeks can nonetheless be established for the majority of standard employment-related applications, drawing on MA survey data.⁹⁷

The lack of predictability is itself a barrier. Applicants cannot anticipate procedure duration, and employers cannot plan recruitment around it. Where recognition determines whether a work permit can be issued or renewed, delays translate into loss of income, administrative limbo, and in some cases forced return⁹⁸. TCN described procedures lasting several years and prolonged periods of administrative silence. 21 (11.5%) of surveyed TCN withdrew their application due to the excessive length and cost of the procedure⁹⁹. Some testimonies linked long procedures to forced professional inactivity (39 of 253), delayed careers (34 of 253), and prolonged dependency on precarious employment (39 of 253). 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 recognition decisions¹⁰⁰. This not only adds complexity, but unpredictability may prevent the fulfilment of requirements for the recognition process, including the ability to complete adaptation measures required by CA in some MS (DK, HR,

⁹⁰ CA survey, Q33 (n=190). 83.7% declared they do not consider prior assessment.

⁹¹ Survey of CAs, Q16 (n=190); in addition 29 of 190 CAs reported they did not know the duration of procedures for TCN.

⁹² Survey of CAs, Q10 (n=190). MS requiring the listed documents: AT, BE, DE, EE, ES, FR, HR, LT, MT, NL, PT, RO, SI.

⁹³ NARIC survey, Q10 (n=18)

⁹⁴ TCN survey, Q13 (n=160)

⁹⁵ See Annex 4: analytical methods (Level 3 – Social cost and opportunity cost)

⁹⁶ MA survey (n=48). 50% could not quantify additional time. 50% indicated that the additional time attributable to such checks is unknown (AT, CZ, FR, IE, IT, LT, MT, PL, PT, SK, SE).

⁹⁷ MA survey (n=48). 50% report checks before conclusion; 14.6% in parallel; 14.6% varies by route. EMN (2024b); MPF (2024). See Annex 9.

⁹⁸ Focus Group with TCNs (FG6, n=12); PC, Q26 (n=98); TCN survey, Q12 (n=183)

⁹⁹ CN Survey, Q12 (n=183)

¹⁰⁰ Contribution to the call for evidence (DKG; CCBC); MS bilateral meetings

IE, PL), or result in the rejection of talent-visa applications for reasons related to visa requirements (SE).¹⁰¹

Sub-driver 2.2: Burdensome documentation and translation requirements

Recognition procedures typically require extensive supporting documentation, including diplomas, transcripts, proof of professional experience and other formal evidence. All surveyed CA for **regulated professions** require on average over six different documents to be submitted in original paper form.¹⁰² These requirements generate particular complexity for TCN who cannot access their original documents (including refugees, asylum seekers and those who fled conflict¹⁰³) for whom obtaining documents from institutions in the country of origin may be impossible or prohibitively costly. In addition, the large majority of surveyed CA, across all Member States, require certified translations adding to the complexity, length and cost of the process.¹⁰⁴

The documentation burden is one of the most distinctive aspects of the TCN experience. EU nationals exercising intra-EU mobility under PQD face document requirements within a framework that limits what can be demanded and provides legal recourse. No equivalent framework exists for TCN. The requests for original curricula or legacy documents, are amplified where TCN are required to go through repeated or overlapping processes in MS.

CA may also request additional documents that applicants do not directly hold, requiring contact with national administrations or training institutions in their country of origin. This is typically time-consuming and, in conflict-affected contexts, sometimes not achievable¹⁰⁵. The requirement for in-person verification or physical document submission is particularly burdensome for TCN residing abroad who have no legal pathway for entry to a MS for recognition purposes alone¹⁰⁶. Moreover, only some MS have fully¹⁰⁷ or mostly¹⁰⁸ digitalised procedures, thus pointing to an overall burdensome and lengthy recognition procedure for TCNs.¹⁰⁹ Where digital procedures exist, they may require a national eID¹¹⁰ or in-person identity verification that TCN do not yet possess.¹¹¹

For employers, documentation requirements generate their own burdens. Verifying the authenticity of foreign documents may require engaging intermediaries, allocating internal

¹⁰¹ Bilateral MS meetings; Focus Group on labour migration with MAs and IOs (n=28)

¹⁰² Survey of CAs, Q10 and Q11 (n=190)

¹⁰³ European Commission (2011); targeted interviews (3 IOs, 2 CSOs, 1 CA, 1 HR dept); call for evidence (IOM; ENSIE)

¹⁰⁴ 151 out of 190 surveyed CA require certified translations, 111 requiring them systematically for all documents submitted, and a further 54 in specific circumstances

¹⁰⁵ Focus Group with individual TCNs (FG6, n=12); targeted interviews synthesis; NARIC survey: 66.7% of centres identified missing or incomplete documentation as a cooperation challenge (n=18).

¹⁰⁶ Survey of CAs, Q12 (n=190); European Commission (2011)

¹⁰⁷ AT, BE, EE, ES, FI, FR, IE, IT, MT, PT, SE

¹⁰⁸ LT, LU, LV, NL

¹⁰⁹ Survey of CAs, Q18 (n=190). See Annex 8.

¹¹⁰ eID is a set of services provided by the European Commission to enable the mutual recognition of national electronic identification schemes (eID) across borders: <https://ec.europa.eu/digital-building-blocks/sites/spaces/DIGITAL/pages/467109253/eID>

¹¹¹ Survey of CAs, Q18 (n=190)

administrative resources and understanding documents from unfamiliar systems. For SMEs, which lack specialised HR capacity, such burdens can be disproportionate and may discourage recruitment from third countries even where labour demand is clear.¹¹²

Sub-driver 2.3: High and unclear costs

Recognition procedures generate significant direct and indirect costs. Direct costs include administrative fees, translations, legalisations, apostilles, examinations and mandatory training or bridging courses. Indirect costs include income lost while preparing for and undergoing the procedure, as well as employer opportunity costs from delayed recruitment and prolonged vacancies.

Fee structures vary substantially across MS and are often difficult to anticipate in advance. The level of application fees shows extreme variation across MS and professions, ranging from no fees at all to charges exceeding EUR 2000, with an average lying at around EUR 150.¹¹³ Health professions, and in particular medical doctors and dentists, are consistently associated with the highest financial burden, with fees above EUR 1,000 reported in several Member States (HR, FI, NL, SE). Moreover, during the application process, in 16 MS¹¹⁴ additional costs may arise, such as authentication or legalisation of documents¹¹⁵, as well as expenses associated with additional training, examinations, or tests required as part of compensation measures. For medical qualifications, costs range from zero (BG, FR, LU, PL) to EUR 1,700 for the BI-Test.¹¹⁶

The quantified cost baseline is presented in full in Section 6.1 (Table 6.1) and in Annex 4.5. The average total cost per recognition procedure is estimated at EUR 1,500, comprising an average application fee of approximately EUR 150 (ranging from zero to over EUR 2,000 across MS and professions), certified translations averaging EUR 200, legalisation averaging EUR 150, and compensation measures where applicable.¹¹⁷

Financial uncertainty aggravates the burden. Whether for recognition procedures (for visa/residence decisions, access to regulated professions or other purposes) applicants are rarely informed in advance of the full scope and total costs involved¹¹⁸; initially unforeseen obligations (e.g. translation requirements or in-person procedures) can emerge mid-process, increasing both the financial and psychological burden and discouraging qualified persons from pursuing recognition¹¹⁹. For TCN, this financial unpredictability is particularly acute. Unlike EU nationals who can remain legally in the host MS while pursuing recognition for access to a regulated profession, TCN often face these costs under conditions of **precarious or conditional**

¹¹² 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*.

¹¹³ CA survey, Q17 (n=190) For further details, see Annex 9(b)(vi) Costs and fees (migration procedures).

¹¹⁴ AT, DE, EE, ES, FI, HR, HU, IE, IT, LV, MT, NL, PL, PT, RO, SI

¹¹⁵ Survey of CAs, Q17 (n=190). See **Error! Reference source not found.**

¹¹⁶ Survey of CAs, Q17 (n=190); EMN (2024a). The Netherlands BIG-register (Beroepen in de Individuele Gezondheidszorg) requires non-EU doctors to [pass a competence assessment](#) called the BI-test.

¹¹⁷ Full cost methodology and breakdown in Annex 4.5. Summary in Section 6.1

¹¹⁸ PC, Q36 (n=84); targeted interviews (2 CSOs, 2 IOs); Focus Group with individual TCNs (n=12); Focus Group on information support (n=28)

¹¹⁹ Bilateral MS meetings; DG HOME/Kantar (2023)

residence, meaning that the decision to invest in recognition is taken under heightened financial and legal uncertainty.

Driver 2 – EU Instruments: Procedural burdens cannot be resolved by the existing EU policy ecosystem. Commission Recommendation EU 2023/2611 addresses procedural complexity but creates no enforceable rights. The EU's attract and match instruments (The Talent Pool, Talent Partnerships) help prospective applicants find vacancies, entry routes and information on recognition procedures before arrival, but have no bearing on the nature of the recognition procedures themselves in a MS. The EU legal migration directives grant certain categories of TCN a right to equal treatment with nationals in accessing recognition procedures but say nothing about how those procedures are designed. Further analysis of EU instruments is provided in Annex 8, The EU talent ecosystem.

2.3.3. Driver 3: Lack of trust in and understanding of qualifications and skills obtained in third countries

Assessing foreign qualifications or credentials requires not only verifying the authenticity of documents, but also understanding how third-country education, training and professional experience correspond to national requirements. Where such understanding is limited, authorities apply more cautious and resource-intensive procedures, while employers hesitate to recruit otherwise suitable candidates

Sub-driver 3.1: Concerns about authenticity and reliability of documentation

Concerns over the authenticity of documents issued in third countries constitute a significant challenge for national CAs. Verifying the authenticity of third-country qualification documents is among the main challenges reported by CAs: 18 of the 21 MS represented in the CA survey identified this as a primary difficulty¹²⁰ (AT, DE, EE, ES, FI, FR, HU, IE, IT, LV, LT, LU, MT, NL, PL, PT, RO, SK), a finding corroborated by almost 90% of ENIC-NARIC centres consulted across 15 countries.¹²¹

Particular difficulty was reported for qualifications from countries with weak administrative systems or conflict zones, including Syria, several African countries, Ukraine, and for countries where building trust is structurally difficult, such as India, Brazil, Mexico and the Philippines.¹²² Several MS (BE, DE, EE, ES, IE, LV, SK) also reported evidence of fraudulent documents and diploma mills. Concerns were confirmed by NARIC centres and recognition bodies in third countries themselves.¹²³ The PC highlighted that approximately 25% of public authority respondents frame trust issues primarily in relation to verification and authenticity concerns.

Sub-driver 3.2: Insufficient knowledge of third-country educational systems, curricula and standards

¹²⁰ Survey of CAs, Q28 (n=190)

¹²¹ NARIC survey, Q26 (n=18)

¹²² Bilateral MS meetings; Focus Group on access to regulated professions with CA of electricians and crane operators (n=20); Focus Group on information support to TCNs with ENIC NARIC centres and PES (n=37)

¹²³ Targeted interviews with 15 TC authorities

National authorities often struggle to interpret and compare TCQs as well as the type of professional activities performed by TCN in third countries, due to limited knowledge of third-country education and training systems.¹²⁴ The delays associated with such information barriers make the recognition and, as a consequence, the recruitment procedure lengthier and more burdensome and cause distrust of employers for the qualifications possessed by TCN.¹²⁵ Indeed, several MS (AT, DE, FR, ES, PL, SK) reported a high degree of discrepancy between the EU and third-country education and training standards which hinder the assessment.¹²⁶

Employers, in particular SMEs, also experience challenges when assessing qualifications obtained in third countries, due to lack of knowledge of third country qualifications.¹²⁷ 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. Consulted stakeholders pointed out that the lack of knowledge leads to the exclusion of TCN candidates.¹²⁸

Sub-driver 3.3: Doubts about the efficacy of quality assurance within third-country systems

Even where formal quality assurance (QA) arrangements or qualifications frameworks exist in third countries, recognition bodies frequently remain uncertain about their reliability.¹²⁹ CA and sectoral stakeholders in the PC underlined that third-country QA arrangements are often insufficiently known, unevenly documented or difficult to verify from an EU perspective.¹³⁰ As a consequence, authorities tend to adopt a precautionary approach, relying on intensive individual scrutiny rather than systemic recognition. The trust deficit is widespread rather than exceptional: 60.5% of CA reported trusting evidence and documents related to TCQ only to a moderate (51.1%) or low (8.8%) extent.¹³¹ This directly affects how recognition applications are assessed, often leading to more cautious, resource-intensive or fragmented outcomes.

This trust deficit is primarily driven by persistent information barriers. CA 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.¹³² Without cumulative institutional knowledge or shared reference points, QA arrangements in third countries are assessed in isolation, 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.

¹²⁴ 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 CA of electricians and crane operators (n=20); Focus Group with CA in the healthcare sector (n=31)

¹²⁵ DG HOME/Kantar (2023)

¹²⁶ Bilateral MS meetings

¹²⁷ Bilateral MS meetings; DG EMPL/ECORYS (2017); DG HOME/Kantar (2023); targeted interviews (3 HR depts, 1 IO)

¹²⁸ Targeted interviews with three HR departments and one IO

¹²⁹ ETF (2025); ETF (2024); targeted interviews (2 IOs)

¹³⁰ ETF (2025); ETF (2024)

¹³¹ Survey of CAs, Q15 (n=190)

¹³² Call for evidence (Taflan GmbH; ZDH; ONCD); PC, Q25 (n=486)

Driver 3 – EU Instruments: The trust deficit is addressed only partially and indirectly by existing EU instruments. The EQF offers a meta-framework for comparing qualifications across systems, and Talent Partnerships support pre-departure skills development in partner countries, but neither builds the institutional trust in specific third-country qualifications that MS authorities need to simplify or accelerate individual recognition decisions. ENIC-NARIC centres provide valuable expertise, but their assessments remain national and serve the divergent needs of each system rather than a common trust framework. No existing instrument provides a systematic mechanism for establishing trust in TCQ across all relevant authorities. Further analysis of EU tools is provided in Annex 8, Recognition-specific instruments.

2.4. How is the problem likely to persist?

Without further action, the problem is likely to persist and may intensify over time.

First, the identified drivers are structural. Recognition systems and procedures differ substantially across and within MS and mutual learning and cooperation among MS remains fragmented. The administrative burdens associated with recognition are therefore unlikely to diminish on their own. Even where MS take action to simplify procedures, these may only be implemented for particular professions, sectors or migration pathways and results are siloed. This pattern of national action addressing specific use cases rather than the underlying system is consistent with the broader dynamic identified in the Commission's 2025 Strategic Foresight Report¹³³. Structural challenges that evolve in fragmented governance environments tend to compound rather than resolve, as incremental national responses generate further divergence and complexity rather than systemic improvement. In the absence of greater simplification the scale of uncertainty, delays and costs may in fact worsen as structural issues of demographic ageing and skills shortages intensify.

Second, labour market pressures are expected to remain high. Long-term demographic projections indicate that the EU labour supply will continue to contract. The share of the working-age population is projected to decline steadily after 2030, while the old-age dependency ratio is expected to rise from 33% in 2022 to over 50% by 2050¹³⁴. These trends point to a structurally tighter labour market, with fewer entrants replacing retiring workers and increasing reliance on migrant labour, particularly in sectors already experiencing shortages. The EU population is projected to peak at around 453 million in 2029 before entering a gradual decline; the share of the working-age population (aged 20–64) is projected to shrink from approximately 58% in 2022 to around 50% by 2100¹³⁵. The resulting strain on labour markets and public finances are among the central structural challenges facing the EU through to 2040¹³⁶.

Third, future skills demand is expected to remain strong even without rapid net employment growth. Forecasts to 2035 indicate that around nine out of ten job openings in the EU will arise from replacement demand, notably in health and long-term care, construction,

¹³³ European Commission, Strategic Foresight Report 2025 — Resilience 2.0, September 2025, pp.4–5.

¹³⁴ Cedefop (2023); Cedefop (2021); Cedefop (2020).

¹³⁵ EUROPOP2023 population projections, March 2023 (dataset proj_23np)

¹³⁶ European Commission, Strategic Foresight Report 2025 — Resilience 2.0, September 2025, pp.13–14

manufacturing, transport and technical professions¹³⁷. Many of these sectors include regulated occupations or depend on a high degree of confidence in qualifications and skills. This means that barriers to recognition are likely to remain a binding constraint on labour market matching. The Commission's 2025 Strategic Foresight Report reinforces this outlook, identifying labour market reconfigurations driven by demographic and technological megatrends as a priority area of action, and framing the ability to deploy skills effectively — including from abroad — as a condition for sustaining EU competitiveness and economic resilience through to 2040. Recognition barriers that prevent the effective deployment of available qualified workers are therefore not only a procedural inefficiency but a constraint on a strategic EU priority.

Fourth, sector-specific shortages reinforce this outlook. In health and long-term care, for example, the EU is expected to face a shortfall of around 2 million additional workers by 2030¹³⁸. The Commission's 2025 Strategic Foresight Report confirms that healthcare and elderly care systems face structural long-term pressures from labour and skills shortages that compound the effects of demographic change that are among the central challenges to European societal resilience through to 2040. Simulations project healthcare workforce growth of only 16% for doctors and 8% for nurses by 2071 against requirements of 30% and 33% respectively to meet the demands of an ageing population, with the period to 2036 identified as the window of greatest urgency as large cohorts approach retirement while replacement flows remain insufficient.¹³⁹ Foreign-trained professionals already play a significant role in European healthcare systems, and several MS have reinforced their workforces through international recruitment — underscoring that the gap between domestic supply and demand cannot be closed without continued inflows of qualified professionals from third countries.¹⁴⁰ The consequences of this shortfall are not uniform: rural, peripheral and border regions face a disproportionate burden, as systemic weaknesses prevent them from attracting or retaining the qualified workforce that more dynamic urban centres can offer. The recognition of qualifications constitutes a key access barrier within this complexity. Without improvements in recognition systems, projected labour shortages are therefore likely to coexist with the continued underutilisation of available third-country skills.

3. WHY SHOULD THE EU ACT?

3.1. Legal basis

The legal basis for this Union action is Article 79(2)(a) and (b) TFEU, which empower the European Parliament and the Council, acting in accordance with the ordinary legislative procedure, to adopt measures concerning the conditions of entry and residence of TCN, and the definition of their rights, including access to employment.

¹³⁷ Eurostat: Population projections in the EU, https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Population_projections_in_the_EU: EU's population projected to drop by 11.7% by 2100

: <https://ec.europa.eu/eurostat/web/products-eurostat-news/w/ddn-20260416-1>

¹³⁸ European Commission (2021).

¹³⁹ Bernini, A., Icardi, R., Natale, F. and Nedee, A., Healthcare workforce demand and supply in the EU27, JRC, 2024 (JRC139503).

¹⁴⁰ OECD, Recent Trends in International Migration of Doctors, Nurses and Medical Students, 2019; Bernini et al., JRC139503, op. cit.

The action aims to facilitate the recognition of qualifications of TCN, to improve their access to the EU labour market and the effective use of their skills. Recognition of qualifications is directly linked to the conditions of entry and residence within the meaning of Article 79(2)(a) TFEU. Access to employment and therefore to residence for work purposes often depends on whether qualifications acquired in third countries can be recognised. The action contributes to making the procedures linked to meeting the conditions for admission for employment purposes simpler, more efficient and more transparent, and their outcomes more predictable for both applicants and employers.

At the same time, the action supports the effective exercise of rights of TCN legally residing in the Union under Article 79(2)(b) TFEU. By simplifying recognition procedures, the action facilitates access to employment corresponding to their qualifications and skills, thereby reducing underutilisation of talent and supporting equal treatment in working conditions. The envisaged Union action therefore falls within the scope of both Article 79(2)(a) and (b) TFEU.

3.2. Subsidiarity: Necessity and added value of EU action

The objectives of improving streamlined, simple and trusted recognition procedures for TCN cannot be sufficiently achieved by MS acting alone: a coordinated EU-level approach is necessary to address divergence, establish common procedural rules and deliver more predictable outcomes across the Union. The PC confirmed this with 95.3% of respondents considering EU-level action very or somewhat necessary.

The added value of common rules for the recognition of qualifications in the EU lies in simplifying a divergent set of national procedures into a more consistent approach that enables the functioning of the Single Market. TCN will be able to better understand requirements, prepare applications, and anticipate outcomes. Similarly, for employers, particularly SMEs that currently lack the resources to navigate divergent national systems, more reliable and usable recognition procedures would lower the administrative burden of recruitment and facilitate workforce planning, directly addressing a barrier within the Single Market that limits employers' ability to draw on the full pool of available talent.

More broadly, a coherent and accessible recognition framework would strengthen the EU's position in the global competition for talent. The EU presents itself as a single destination, a single trading partner, and a single labour market through instruments such as the EU Blue Card, the EU Talent Pool, the European Legal Gateway Office pilot in India, and EU Talent Partnerships. These each depend on recognition systems functioning adequately to deliver their intended results. If recognition remains cumbersome and unpredictable, the value added of those instruments will be reduced for employers and jobseekers. The action would send a clear signal that the Union offers fair and navigable routes for skilled workers to use their qualifications complementing these EU instruments and reinforcing competitiveness. Acting at EU level would also generate economies of scale in addressing the issues of trust and understanding of qualifications, by maximising mutual learning about qualifications issued in third-countries. Shared tools are inherently more effective when developed collectively than when replicated separately across 27 MS.

Critically, this action would complement rather than replace national systems. MS would remain fully responsible for defining which professions are regulated, the organisation of training systems, taking individual recognition decisions, and managing migration policy and

admission decisions. Importantly, although the action will aim to minimise duplication of processes, it does not create a “once only process” by which recognition in one MS would be valid for the whole of the EU.¹⁴¹ Hence, common rules on procedures, documentation, timelines and safeguards, would support existing frameworks, while preserving flexibility in implementation and respecting national competence.

4. OBJECTIVES: WHAT IS TO BE ACHIEVED?

4.1. General objectives

The general policy objective of SPI Action 3 is: **Facilitating the recognition of qualifications for TCN to address EU labour and skills shortages.**

This general objective addresses persistent barriers faced by TCN in accessing EU labour markets. By reducing divergence, administrative barriers, and legal uncertainty the action aims to contribute to the EU economy and competitiveness by addressing labour and skills shortages and support the Commission’s simplification agenda.

4.2. Specific objectives

The specific policy objectives are:

SO1: Streamlined recognition systems within and between MS	Improved alignment and consistency between national recognition systems across the EU, and coherence within MS, between recognition procedures for access to regulated professions and those embedded in migration regimes.
SO2: Reduced legal and administrative complexity for recognition of qualifications of TCN	Clearer and less burdensome requirements, documentation and procedural steps for TCN applicants, employers and authorities, including, reduced administrative steps and enhanced user-friendliness.
SO3: Increased trust and understanding of qualifications obtained in third countries	Improved transparency, comparability and trust of TCQ within the EU, through enhanced information availability and mechanisms that support the assessment of foreign qualifications and skills.

5. WHAT ARE THE AVAILABLE POLICY OPTIONS?

5.1. What is the baseline from which options are assessed?

Under the baseline, recognition of qualifications for TCN will continue to be governed by divergent national systems without EU-level coordination. Improvements undertaken by

¹⁴¹ This approach is in line with the system in place for mobile EU citizens under the PQD. This system is built on mutual recognition of professional qualifications but does not provide for mutual recognition of recognition decisions.

individual MS are likely to address specific use cases (particular professions, sectors or migration pathways) rather than the underlying structural fragmentation identified in Chapter 3. The result is a trajectory of incremental national change that is likely to generate further divergence rather than convergence, as each MS develops its own responses in isolation.

At EU level, Commission Recommendation (EU) 2023/2611¹⁴² will continue to provide the main horizontal framework, encouraging MS to simplify procedures and exchange good practices. As set out in Annex 8, however, its non-binding character means it cannot create enforceable procedural rights, impose deadlines or mandate coordination between recognition and migration systems; its capacity to address the structural drivers identified in Chapter 3 will therefore remain limited. Talent attraction instruments¹⁴³ will continue to develop and will improve information provision and upstream preparation but will not alter the nature of national recognition procedures. EU legal migration directives¹⁴⁴ will continue to provide harmonised admission conditions for certain categories of TCN, but their impact on recognition procedures through equal treatment provisions will remain limited. None of these instruments will structurally address the organisation, design or functioning of recognition systems.

Under the baseline, TCN will therefore continue to face the procedural barriers described in Chapter 3: divergent national systems producing uncertain and inconsistent outcomes, burdensome documentation and cost requirements, and recognition authorities with limited capacity to assess third-country qualifications with confidence. For prospective migrants, the absence of predictable recognition pathways will continue to operate as a deterrent that shapes destination choices in favour of countries offering faster and more predictable routes to employment. The EU's structural disadvantage relative to competitor destinations in recognition predictability will persist.¹⁴⁵

These conditions will be particularly acute for access to regulated professions, where TCN will continue to operate without the procedural guarantees available to EU citizens under the PQD. Labour shortages in regulated sectors, documented in Chapter 3, will persist and are projected to intensify in particular in healthcare, where demographic pressures will compound the effects of current recognition barriers. The conditions conducive to undeclared work identified in Chapter 3 will remain fully in place in the absence of binding procedural reform.

Mutual Recognition Agreements (MRAs), whether standalone or embedded in free trade agreements, remain relatively rare in practice and their overall impact on addressing large-scale labour market needs will remain limited. EU transparency tools, including the EQF, would continue to contribute to improving the comparability and understanding of qualification from third countries, in a context of comparisons between the EQF and qualifications frameworks from third countries, but use of qualifications frameworks and meta frameworks will not resolve underlying issues of divergence and duplication in recognition systems for third-country nationals.

¹⁴² Commission Recommendation (EU) 2023/2611, recitals 4–6; Annex 8 (Legal and Policy Context).

¹⁴³ The EU Talent Pool, Talent Partnerships and the European Legal Gateway Offices (Annex 8 (Legal and Policy Context).)

¹⁴⁴ Overview of EU legal migration instrument and links with recognition in Annex 8 (Legal and Policy Context).

¹⁴⁵ OECD (2023)

Separately, implementation of validation of skills for TCN will continue to vary significantly across MS and its use for TCN remains uneven (See Annex 10).

5.2. Description of the policy options

All three policy options identified aim at improving the recognition of qualifications of TCN in the EU (including qualifications obtained in a third country and in another MS¹⁴⁶). They each address the divergence, procedural complexity and lack of trust that currently characterise national systems. The options address procedural and systemic barriers to recognition of qualifications but do not impact MS competence to define which professions are regulated, the organisation of training systems, to take individual recognition decisions, and to manage migration policy and admission decisions. A set of non-legislative supporting measures can accompany each of the options to support their implementation and effectiveness. These include promotion and awareness raising of the EU Talent Pool; facilitating pre-departure support under Talent Partnerships; supporting cooperation and exchange of good practices among MSs and stakeholders on recognition and validation¹⁴⁷; and, awareness raising of the changes introduced under this action focusing on the practical benefits of well-managed recognition for addressing skills and labour shortages, and the benefits for TCN, EU citizens and employers within the Single Market.

5.2.1. PO 1 – Soft measures to enhance procedures for the recognition of qualifications of TCN (voluntary)

PO1 addresses the objectives through a coherent set of practical tools developed collaboratively by the Commission, MS, and relevant stakeholders. This option creates the conditions for greater commonality and more user-friendly processes. The voluntary character ensures that progress is anchored in shared commitment and incremental trust, while its practical and granular tools are designed to deliver tangible improvements to procedural barriers. The measures comprising PO1 (B1–B10) are described in detail in Annex 12.

To drive convergence of systems, common EU guidelines and best practices would be developed covering recognition systems and methodologies for consistent qualification assessments, complemented by comparative studies to support evidence-based alignment. These tools directly target the systemic fragmentation and duplication that currently impede mobility and consistent outcomes within and between MS.

To support simplification of administrative procedures, common templates, checklists, and guidance on procedural steps, fees and documentation requirements would be co-developed, alongside improved EU-level information provision for TCN and employers. The aim is to make processes more accessible, predictable and coherent in practice, addressing the complexity and lack of transparency that often discourage or delay applications.

¹⁴⁶ While the scope of this action is facilitating recognition for TCN, it will be complemented by targeted amendments to the PQD to guarantee equal treatment for EU citizens holding TCQ. See Annex 8 Legal and Policy context.

¹⁴⁷ As set out in Annex 7 (discarded options), EU action on procedural rules for validation is not considered within this IA. Accompanying measures are considered the most appropriate way to support exchange and cooperation on validation, in alignment with the ongoing implementation of the Council Recommendation on validation

To build trust in TCQ, AI-assisted solutions for authenticity verification would strengthen confidence among CA and employers, complemented by comparative work on how third-country qualification frameworks relate to the EQF and analytical work to improve the transparency and comparability of quality assurance arrangements in third-country systems. Together, these tools support more consistent and well-informed decision-making, addressing the uncertainty that can lead to inconsistent or overly cautious outcomes.

5.2.2. PO 2 – Common rules to streamline procedures (binding)

PO2 introduces a binding legal framework establishing EU level common procedural rules for the recognition of qualifications. It will apply to recognition procedures to access regulated professions and any qualifications recognition procedures that form part of migration procedures. The measures comprising PO2 (A1–A10) are described in detail in Annex 12.

The rules are modelled on the procedural framework of the PQD. This ensures that TCN are not treated more favourably than EU citizens exercising free movement rights and anchors the rules in a framework already tested across MS¹⁴⁸. The framework is designed to accommodate the different contexts in which qualification checks take place. The standard of scrutiny applied to a qualification check within a migration procedure need not replicate the depth of assessment required for access to professional practice. The check should be proportionate to its purpose and conducted within a predictable and transparent procedural framework without creating undue burden for the MS. The aim throughout is to ensure that recognition supports rather than delays or blocks decisions on migration and employment. Within these parameters, the common rules would include:

Rules modelled on the PQD: (1) fixed deadlines (e.g. 1 month to acknowledge receipt and inform of missing documents, 3-4 months for taking a decision), (2) a right to a duly substantiated decision; (3) a right to appeal; (4) an exhaustive list of documents that may be required from applicants; (5) an obligation to provide full transparency on fees.

Rules addressing circumstances specific to TCN¹⁴⁹: (1) a right to receive communications and submit documents in at least one language other than an official language of the Member State that is frequently used by migrants; (2) a framework for imposing compensation measures¹⁵⁰ on TCN, seeking access to regulated professions, with greater flexibility for MS than under the

¹⁴⁸ Targeted amendments to the PQD will ensure that EU citizens with TCQ are not treated less favourably (see Annex 8 (1) on Treaty legal basis).

¹⁴⁹ Third-country nationals face procedural circumstances without equivalent in the PQD framework, including the need to navigate migration procedures as a precondition to labour market access and the absence of the information and support networks available to EU mobile workers. The rules in this section address those specific circumstances.

¹⁵⁰ Under the PQD, if a host EU country finds substantial differences between an applicant's professional qualifications and their national requirements, they may impose compensation measures. EU citizens may choose the form of compensation measure they wish to complete: an adaptation period or an aptitude test. No equivalent framework governs compensation measures for TCNs. In the absence of EU legislation, Member States and competent authorities determine independently whether compensation measures apply, in what form, and on what terms, resulting in significant variation in both the nature and extent of the requirements imposed on TCN applicants for the same profession across different national and regulatory contexts. In addition, to factor in the potentially large volumes of applications as well as existing practices in MS, CA would be able to choose from two additional types of compensation measures.

existing system for EU citizens under the PQD; (3) the possibility for TCN to choose a single integrated recognition procedure, or to re-use verifications across procedures, where recognition requirements arise under both migration procedures and for access to regulated professions; (4) an obligation for MS to provide access to comprehensive, up-to-date and user-friendly information regarding procedures for TCN, including tailored information for refugees.

In addition, PO2 would require MS to develop interoperable national databases on the comparability of TCQ to facilitate the sharing of information and expertise between MS. Furthermore, PO2 would establish an EU-level service to carry out authenticity checks on TCQs to support MS authorities in their assessment procedures.¹⁵¹

MS would be required to adapt their recognition systems and procedures to comply with these minimum rules, thereby establishing the basic conditions that any procedure must meet. This includes aligning documentation requirements, introducing procedural guarantees (such as deadlines and right of appeal), and ensuring coordination between recognition and migration authorities to reduce duplicated procedures as part of clearer and more integrated pathways.

The legal instrument envisaged for this option would be a Directive, based on Article 79(2), points (a) and (b), TFEU, consistent with the form taken by the existing legal migration acquis and mirroring the approach of the PQD establishing common rules for the cross-border recognition of qualifications of EU citizens. A Directive is the proportionate instrument because it lays down a harmonised minimum set of procedural rules rather than exhaustively regulating the field. Member States would retain competence over the regulation of professions, over admission and migration policy more broadly, and over the institutional organisation of recognition and migration authorities. The elements that determine applicants' legal certainty - including the rules pertaining to deadlines, the categories of documents that may be requested, the procedural guarantees, the right of appeal and the transparency of fees - would be harmonised through binding minimum standards. These would be drafted with sufficient precision to ensure uniform application and effective enforcement. While binding on the MS, a Directive affords them the flexibility to integrate the procedural rules regarding recognition into their unique domestic procedures and regulatory landscape. The framework therefore establishes a predictable baseline of treatment throughout the Union, reinforced by strict information obligations requiring the relevant information to be made publicly available through existing EU tools and platforms. This would limit the divergence observed under the current patchwork of national recognition systems while leaving MS discretion over how these common standards are embedded into their national systems.

To ensure harmonised implementation, the Commission would closely monitor compliance both in law and in practice through a transposition review, rigorous enforcement and regular exchanges of good practices:

- Following the transposition deadline, and drawing on experience with the Professional Qualifications Directive (PQD), a comprehensive conformity check would be deployed

¹⁵¹ Both these activities would be developed as an extension of existing Commission activities in the area of transparency of qualifications and skills, building on established instruments including the European Qualifications Framework, digital infrastructure, databases of qualification information, and the facilitation of cooperation between Member States in this area.

to detect and address inconsistencies in national legal frameworks early on, particularly in decentralised systems involving a wide range of different competent authorities. This review would also verify that MS have established the necessary institutional arrangements for practical compliance, including structured cooperation between migration and recognition authorities where required.

- Following the initial transposition check, the Commission would follow up to ensure that MS comply also in practice with their obligations under the Directive. The more detailed annual statistics to be provided by MS - including data on outcomes, average processing times, average information exchanges per case and the number of authenticity checks requested - will provide a concrete basis for identifying possible patterns of non-compliance, complemented by complaints received from TCN and other stakeholders. Where evidence points to a broader administrative practice incompatible with the Directive, the Commission may take enforcement action. At the same time, in line with the Union's decentralised enforcement system, individual cases remain primarily a matter for national remedies and judicial review.
- Continuous uniform implementation would be reinforced through regular exchanges of good practice within the relevant expert group, fostering convergence in administrative interpretation and resolving operational bottlenecks collectively.

5.2.3. PO 3 – Common rules and Automatic recognition for selected professions (binding)

PO3 includes the common procedural rules described under Option 2 and introduces an EU system of automatic recognition for TCQ for specific regulated professions. The measures comprising PO3 (A1–A13, building on the PO2 measures A1–A10) are described in detail in Annex 12. The legal instrument for this Option would also be a Directive, integrating the common procedural rules described under Option 2 and including additional provisions specifically on automatic recognition. Harmonised implementation would be ensured in the same way as explained above.

Regarding the additional elements pertaining to automatic recognition, recognised third-country education and training institutions could apply to have specific programmes reviewed for compliance with EU quality assurance standards¹⁵² and the relevant minimum training requirements established under the PQD for the seven sectoral professions. Even well-run procedures operating with common procedural rules still require individual case-by-case scrutiny that cannot scale to meet the volume and pace of skilled migration the EU needs, and still produce variable outcomes for the same qualification assessed in different MS. With structural labour shortages deepening, particularly in the sectoral professions where EU-level minimum training standards already exist, procedural improvements alone cannot deliver the consistency and predictability that applicants and employers require. PO3 addresses this by

¹⁵² The Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) and the European Quality Assurance Reference Framework (EQAVET) provide complementary frameworks for internal and external quality assurance across European education and training systems, supporting trust and mobility across systems irrespective of the delivery mode. While the ESG underpin quality assurance in higher education within the Bologna Process, EQAVET offers an equivalent European-wide reference framework for vocational education and training (VET).

moving from procedural alignment to systemic trust, replacing repeated individual case-by-case assessments with verification of programmes against agreed standards

For the system to operate, first, the applying institutions would undergo a quality assurance review, building on established international cooperation in quality assurance. Reviews would be conducted by trusted review bodies satisfying functional criteria defined at EU level, which would apply to the Commission for inclusion on a dedicated list. For higher education qualifications, the potential population of trusted review bodies comprises the quality assurance agencies registered on the European Quality Assurance Register for Higher Education (EQAR). Registration on EQAR requires demonstrated compliance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG), so that the framework provides a defined quality standard, an independent mechanism for verifying that review bodies meet it and, through the Database of External Quality Assurance Results (DEQAR), a public record of review outcomes on which the system can rely. For the vocational strand, bodies would be identified against the same functional criteria, adapted to the characteristics of VET. The reviews would be performed by multidisciplinary expert teams and include on-site visits, with both positive and negative outcomes published to ensure transparency.¹⁵³ The second stage would be a check of compliance with the minimum training requirements established under the PQD for the relevant profession. The minimum training requirements define a fixed threshold, and a programme either meets them or does not. It is upon this basis that automatic recognition can be extended with confidence.

Approval would be granted for a defined validity period, indicatively five years, with renewal subject to a further review confirming continued compliance, ensuring that recognised programmes remain aligned with evolving EU standards. Between reviews, institutions would be required to notify substantive changes to an approved programme, MS participating in review teams could trigger an early re-assessment where justified concerns arise, and approval could be suspended or withdrawn where the conditions are no longer met. The costs of verification would be borne by the applying institutions, not by MS or individual applicants, making the system financially self-sustaining. Fees would be set according to a defined scale of factors, including profession type, the complexity of the assessment required, and whether on-site visits are necessary.¹⁵⁴ Recognition costs for individual TCN under this channel would also fall, since the role of the competent authority is confined to verifying the applicant's identity, the authenticity of the credential and its correspondence to a programme listed on the EU register, with authenticity verification supported at EU level, so that individual procedures are shorter and less costly than case-by-case assessment. Qualifications would need to be issued as verifiable digital credentials by the third country institution to guarantee authenticity and ease of verification by authorities and employers. Qualifications issued on the basis of successfully reviewed programmes would be listed in a publicly accessible EU register.

¹⁵³ Reviews would be adjusted to the nature of the third-country quality assurance system whereby more intensive assessments may be applied where there are different or under developed QA systems or less intensive reviews of QA where a robust national framework is in place.

¹⁵⁴ For institutions in lower-income countries, cost may nonetheless constitute a significant barrier, and capacity-building support under existing EU external action instruments, such as Talent Partnerships and the Global Gateway, could serve as a flanking measure.

The plausibility of institutional demand is supported by the pattern of engagement observed under existing skills mobility projects between individual MS and partner institutions in third countries. Origin-country institutions have consistently demonstrated the willingness and the capacity to align their training with EU requirements, submit to joint certification and bear the associated adjustment costs, because doing so raises the value and portability of the qualifications they confer.¹⁵⁵ This pattern is corroborated by established international quality assurance systems operating on the same logic: ABET, the leading accreditor for engineering and technology programmes, now accredits close to 4,900 programmes across 42 countries outside the United States, almost entirely through voluntary international uptake. In medical education¹⁵⁶, WFME's Recognition Programme grew from its first recognised accrediting agency in 2012 to 33 recognised agencies and a further 16 in application by 2022, together covering over three-quarters of the world's medical schools, once a clear link to US residency eligibility created a concrete incentive to engage.¹⁵⁷ The fees such bodies charge for programme-level review have not deterred international take-up in these cases. Employers place a high value on training matched to a recognisable standard and correspondingly little on generic provision designed with no destination in mind, and origin institutions respond readily wherever a concrete partnership gives them a standard to align to. An EU system of automatic recognition would supply precisely such a standard at scale, giving these institutions a strong and durable incentive to engage that builds on a demonstrated pattern of commitment rather than presupposing an untested one. The EU-wide channel would operate alongside, and as a complement to, the arrangements individual MS have developed with third countries; it would not replace them and no transition period is required.

The automatic recognition mechanism would apply exclusively to professions for which harmonised minimum training requirements have already been defined under the PQD¹⁵⁸. These professions already have agreed EU-level standards against which third-country programmes can meaningfully be assessed, making prior verification both proportionate and legally coherent. By anchoring the system in existing harmonised standards rather than creating new ones, the option does not harmonise national education systems, does not extend beyond the existing logic of automatic recognition under EU law, and fully respects MS competences to define which professions are regulated, the organisation of training systems, to take individual recognition decisions, and to manage migration policy and admission decisions.

¹⁵⁵ Examples span sectors and regions, including German nursing curricula embedded into partner training programmes in the Philippines, Indonesia and India; vehicle mechanic training co-designed and equipped by Porsche at the Don Bosco Institute in Manila; and the France–Tunisia plastics partnership, comprising forty-two training tracks built jointly with Tunisian vocational institutions. See CGD (2021); Business Advisory Group on Migration (2024); EMN and OECD (2022); OECD (2018).

¹⁵⁶ ABET, At a Glance, 2026, www.abet.org/about-abet/at-a-glance/

¹⁵⁷ Tackett S. et al., "Examining the WFME Recognition Programme at 10 years", Medical Teacher, 2023 (drawing on data to end-2022)

¹⁵⁸ Doctors, nurses, dentists, pharmacists, midwives, veterinary surgeons and architects

Additional professions could become eligible for inclusion within this system over time through the establishment of Common Training Frameworks (CTFs).¹⁵⁹

Holders of approved qualifications would benefit from automatic recognition for access to the relevant regulated profession across all MS, without individual assessment or compensation measures, under the same conditions as qualifications issued within the EU under the PQD. MS administrations would integrate this mechanism into their national procedures, replacing their own assessments for covered professions. MS would nonetheless remain involved through participation in review teams and the ability to trigger a second assessment in cases of justified concern preserving national oversight within the system.

The system must be designed with awareness of political and geopolitical considerations, including engagement with countries subject to EU sanctions or whose participation would be incompatible with EU foreign policy commitments. Further, it must be emphasised that PO3 does not create new migration flows beyond those that MSs themselves decide to accept within their territories. However, as third-country health professionals are already moving to EU MS in substantial and growing numbers, this option will improve the speed, predictability and consistency with which those professionals already can use their skills to the benefit of the EU labour market. In maintaining the system, the Commission will nonetheless have regard to the broader impacts on origin countries' public services, including by reference to the WHO Health Workforce Support and Safeguards List¹⁶⁰, where engagement with specific countries or professions would risk exacerbating documented workforce pressures.

5.3. Stakeholder views

Full stakeholder feedback is set out in Annex 2. **PO1** is widely accepted as a necessary starting point. The PC showed that 75.7% of respondents considered EU-level action very necessary, and MS, employers and CAs broadly welcome the tools proposed. The recurring reservation is that voluntary measures cannot address structural gaps, particularly the absence of a shared EU mechanism for verifying third-country qualification documents. **PO2** attracts the widest support across stakeholder groups. TCN, employers, civil society and professional organisations strongly endorse binding minimum procedural rules. Views from MS authorities and stakeholders are more varied, ranging from explicit support to conditional acceptance (RO) and scepticism (DE) on mandatory binding rules for health professions. **PO3** generates strong interest from TCN, employers and some MS who identify it as potentially the most effective option for shortage professions. The central concern, raised consistently by healthcare professional organisations (CPME, EFN, UEMO), as well as CAs, is that any acceleration of recognition timelines must be underpinned by genuinely rigorous prior verification of training programmes.

¹⁵⁹ Common Training Frameworks (CTFs) are established under Article 49a of Directive 2005/36/EC. They define a common set of knowledge, skills and competences that professionals must possess upon completion of their training, agreed at EU level in cooperation with Member States and relevant professional organisations. Where a CTF exists for a given profession, it serves as the basis for automatic recognition of professional qualifications across Member States, without the need for individual assessment of the qualification concerned. Efforts are already underway to establish a CTF for physiotherapists, and the Commission is working to identify further professions for which such frameworks could be developed, as described in the IA for SPI Action 2.

¹⁶⁰ [WHO Health Workforce Support and Safeguards List](#)

5.4. Options discarded at an early stage

A number of potential measures were examined during the preparation of this action but were not retained for detailed assessment. These are presented with their rationale in Annex 7. Across the problem areas examined, these measures were discarded due to issues of proportionality, legal feasibility and coherence with the existing framework. Among the discarded approaches was a dedicated EU-level digital solution, examined in two variants, namely a new EU-wide platform for recognition and validation procedures and the extension to TCN of the fully unified workflow envisaged under Action 2 of the SPI. Both were discarded on feasibility and proportionality grounds, since digitalisation without prior simplification of the underlying procedures would not address the drivers of the problem, while a modular reuse of Action 2 digital building blocks is retained under all options. The full analysis is presented in Annex 7 and synergies with Action 2 are assessed in Section 7.3.

Intervention Logic

Problem drivers	Sub-drivers	Specific objective	Option 1 Support & coordination	Option 2 Common rules	Option 3: Common rules + auto-recognition Option 2, complemented by:
Diverging recognition systems within and between MS	Different recognition systems applied to the same qualifications across MS	Streamline recognition systems within between MS	- Common guidelines on recognition systems - Comparative studies on recognition practices	- Common EU procedural rules for recognition of qualifications of TCN - Clarification of legal effects of recognition, ensuring access to regulated professions	- Common EU legal framework for automatic recognition of approved TCQ - EU-level register of reviewed TC qualifications - Same legal effect as national qualifications for professions under the PQD
	Duplication & inconsistencies of recognition procedures within MS				
	Lack of clear & accessible information for TCN and employers				
Complex and burdensome administrative procedures for recognition	Lengthy & untransparent administrative procedures	Reduce legal & administrative complexity for recognition of qualifications of TCN	- Guidelines, templates and checklists to streamline procedures - Exchanges among MS to promote convergence of administrative best practices	- Simplification of documentation requirements - Clear procedural guarantees: deadlines, rights of appeal - Access to compensation measures - Limitation of fees to cost-based levels	- Automatic recognition for approved qualifications - Review costs borne by applying education and training institutions
	Burdensome documentation & translation requirements				
	High & unclear costs				
Lack of trust & understanding of qualifications & skills obtained in third countries	Concerns over authenticity of documents issued in third countries	Increase trust & understanding of qualifications and skills obtained in third countries	Fraud and authenticity checklists, digital/AI-powered verification solutions	- EU-level service for authenticity checks - Compensation measures where substantial differences in quality - Interoperable national databases on comparability of TCQ	- Verification of learning programmes against EU quality assurance standards - Verifiable digital credentials required from third-country providers - Review process with multidisciplinary expert teams, on-site visits, and renewal mechanisms
	Insufficient knowledge about third-country educational systems, curricula & standards				
	Doubts about efficacy of quality assurance within third-country systems				

6. WHAT ARE THE IMPACTS OF THE POLICY OPTIONS?

The cost-saving analysis uses a baseline of 125,000 procedures, split between professional recognition procedures in the context of regulated professions (62,500 procedures) and migration-related recognition procedures (62,500 procedures). The source data and methodology underpinning these baseline estimates are explained in detail in Annex 4.

Because they refer to two distinct types of procedures, these two types of recognition are kept separate throughout the analysis. The 62,500 recognition applications in the context of regulated professions are the most time- and resource-intensive, since they rely on a case-by-case assessment of the professional qualifications of the applicant against the applicable legal requirements to exercise a specific profession. The remaining share of migration-related recognition procedures are less costly and time-intensive as, in this context, the assessment takes the form of a verification of diplomas or the application of a standardised point system instead of a comprehensive evaluation of the professional *qualifications*.

An assessment of environmental factors has not ¹⁶¹been carried out as this action is not expected to have significant environmental impacts, including under the 'do no significant harm' (DNSH) principle and climate consistency requirements. ¹⁶²

6.1. Direct cost impacts

The direct cost savings estimated pertain to administrative cost savings (6.1.1.), monetised time savings for the applicant (6.1.2.) and cost savings for the employers (6.1.3.). Implementation costs for public authorities (IT development and maintenance, legal and compliance staff time, recognition-related training, management overhead and cooperation with third countries) are discussed in section 6.1.4.

6.1.1. Direct administrative cost savings

Direct administrative costs for applicants include the application fee paid to the host CA, a fee to ENIC-NARIC where applicable, certified translations of documents, legalisation or apostille fees, notarisation costs, postal or courier charges and additional documentation costs. Per procedure administrative costs for CAs include administrative processing time, expert review time and the costs associated with contacting external issuing bodies to verify information.¹⁶³ These various

¹⁶² The initiative does not assume or project increases in migration to the EU and therefore does not generate additional international travel as a direct consequence. The simplification of recognition procedures does not affect admission flows. Furthermore, this initiative concerns TCNs who typically hold a residence permit tied to a single Member State and do not enjoy the right to move freely between Member States to work. The initiative does not therefore trigger additional cross-border or international movement

¹⁶³ Beyond these variable per procedure costs, competent authorities for the recognition of professional qualifications of TCN incur fixed and semi-fixed annual costs (IT systems maintenance, legal and compliance staff time, recognition-related training, management overhead). 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 POs 2 and 3 through economies of scale and shared infrastructure (e.g. the EU comparability database and harmonised documentation requirements reducing per-case verification effort, common procedural rules, binding deadlines and fee structure rules reducing the case-by-case legal review effort, and the shared comparability database reducing the per-case verification

costs are estimated using survey sources involving CA, ENIC-NARIC centres, and TCN, supplemented by national mappings and focus group dataforms. The source data and the component-level value estimates are detailed in Annex 4.

For recognition procedures in the context of regulated professions, the average per procedure cost is estimated at EUR 1,500 (EUR 1,100 borne by the applicant and EUR 400 by the CA). For migration-related recognition procedures not pertaining to regulated professions, the cost borne by the applicant is estimated at EUR 300.

The administrative cost savings of the different POs reflect partial reductions in document preparation effort, payable fees and other legal and operational costs linked to the drivers listed in Section 2. The size of these reductions is expressed as percentages of the per procedure cost, estimated based on the expected effects of the policy measures on the different cost drivers. These estimates are triangulated across survey evidence, focus group polls, stakeholder consultations and documented administrative bottlenecks. To account for partial implementation effectiveness of the different POs, the administrative cost savings are adjusted by a realisation factor. The analysis faces certain degree of uncertainty, so results are presented in ranges and should be interpreted as indicative. The full methodology, the source data underpinning the calculations and a sensitivity analysis to test the assumptions are presented in Annex 4.

For PO1, administrative costs savings are estimated at 4–8% per procedure pertaining to regulated professions. This reflects the reduction in document preparation effort enabled by improved information availability, and the reduction in CA-side verification effort enabled by capacity building on third-country qualification systems. The realisation factor of 60% per cent reflects the soft-law character of the measures. Per-procedure savings under Policy Option 1 are therefore approximately EUR 36–EUR 72 ($\approx$ EUR 54)¹⁶⁴, corresponding to an aggregate annual administrative saving of approximately EUR 3.4 million per year on the baseline of 62,500 procedures per year. For PO2, a cost savings estimate of 15-22% of the baseline is applied, reflecting the structural reduction in document preparation effort enabled by harmonised documentation requirements, the structural reduction in CA-side verification effort enabled by the EU comparability database and authenticity check service, and the structural reduction in the application fee component enabled by the proportionate fee structure, the multilingual document acceptance reducing translation needs and the minimum mandatory information requirements. Per-procedure savings under Policy Option 2 are therefore approximately EUR 169–EUR 247 ($\approx$ EUR 208), corresponding to an aggregate annual administrative saving of approximately EUR 13 million per year on the baseline of 62,500 procedures per year. The realisation factor of 75% reflects the binding but transposition-discretionary character of the measures.

For PO3, a cost savings estimate of 33-47% is applied on the concerned subgroup of applications for automatic recognition. This reflects 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. Per-procedure savings for the share of automatically recognised applications under Policy Option 3 are approximately EUR 420–EUR

effort. These savings are reflected in the multi-criteria decision analysis as additional cost avoidance items under Policy Options 2 and 3.

¹⁶⁴ The figure between brackets is used for the assessment of total impacts. It represents the average reduction in costs, based on the middle realisation factor (i.e. central scenario).

599 ($\approx$ EUR 510). A realisation factor of 85% is applied to this share of applications specifically, reflecting the fact that this type of recognition procedure leaves less transposition discretion than the general-system rules. As the implementation of this option will happen only gradually (once a larger number of training institutions have been accredited and TCNs fully trained according to the MTR of the PQD become eligible for automatic recognition), aggregated cost savings will take time to materialise. Under a steady state scenario whereby 40% of the 62,500 baseline would be eligible for automatic recognition, they would equal approximately EUR 20.5 million per year on the baseline of 62,500 procedures per year.

For migration-related recognition procedures, cost savings arise from the reduction of documents required and their standardisation. Lower cost savings estimates were used than for regulated professions, reflecting the fact that these checks concern non-regulated professions, which are less complex and offer narrower scope for streamlining. They are estimated at EUR 0.5 million for PO1 and at EUR 1.8 million for both PO2 and PO3.

6.1.2. Monetised time savings for the applicants

In addition to the direct administrative costs linked to procedural requirements, a significant share of the applicants also bear the opportunity cost of not being able to exercise the profession for which they are qualified while the procedure is running. For the purpose of this analysis, the baseline duration of a recognition procedure in the context of regulated professions is estimated at 14.2 months. The full methodology and the source data underpinning these estimates are detailed in Annex 4.

The different policy options would reduce these opportunity costs by compressing the waiting time to a different extent:

- PO1 introduces no binding deadline but raises the visibility and predictability of timelines through the soft-law measures, with an indicative time gain of approximately 10% of the actual baseline ($\approx$ 1.4 months).
- PO2 introduces binding deadlines, 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.
- PO3 introduces the automatic recognition channel for the seven sectoral professions, reducing the processing time for sectoral procedures from 14.2 months to approximately 4 months (range 3–5 months), 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.

To estimate the monthly opportunity cost for the applicants, occupational wage proxies were used. Looking at various typical occupational profiles (nurses, medical doctors, engineers), the central monthly gross wages proxy was set at approximately EUR 4,300, representing an opportunity cost of approximately EUR 800/month for the share of applicants who work below their qualification

level during the processing time and of EUR 4,300/month for those who do not work at all.¹⁶⁵ The monetised time savings associated with each policy option were estimated by combining the volume of procedures in each subgroup, the corresponding reduction in processing timelines, the monthly opportunity cost proxy, the share of applicants either not working or working below their qualification level during the procedure, a calibration factor to account for the fact that they do not all find suitable employment at their qualification level following recognition, and the realisation factors reported above, reflecting the expected degree of effective implementation under each policy option. Taking these various factors into account, the aggregate annual monetised time savings realised under each option are estimated at approximately EUR 33,5 million for PO1, EUR 273,5 million for PO2 and EUR 300 million for PO3. The full methodology is explained in Annex 4. A sensitivity analysis is also provided to test the impact of changes to the main assumptions underpinning the model.

For the 62,500 applications pertaining to unregulated professions, no time savings were calculated since the average duration of these migration-only related recognition procedures would not be affected by the policy options.

6.1.3. Cost savings for employers

In addition to the costs borne by recognition applicants and public administrations, EU employers 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 and the indirect cost of the recruitment cycle prolongation due to the recognition processing time. These costs are estimated at approximately EUR 800–1,200 per recruitment of a TCN professional applying for a regulated profession.

The reductions are driven primarily by shorter recognition processing times, which reduce the employer's loss of productive capacity during the prolonged recruitment cycle, together with the documentation and coordination improvements specific to each option. The different policy options would reduce these costs to a different extent depending on the measures included:

- Under **PO1**, the employer-borne cost is reduced by approximately 5–10% through improved employer-side information availability on the recognition timeline and outcome and on the coordination with migration procedures.
- Under **PO2**, the reduction reaches approximately 20–30%, driven by the binding timelines and the binding coordination requirements between recognition and migration authorities and the harmonised documentation requirements.
- Under **PO3**, the reduction reaches approximately 35–50% for recruitments involving the seven sectoral professions, driven by the automatic recognition channel and the digital credentials infrastructure which enable near-immediate verification by the employer.

¹⁶⁵ These shares are estimated at 49.3% and 16.4% on the basis of from the responses Q15 of the TCN survey, n = 152). For the sake of this simulation, it is assumed that 75% of those already working prior to their qualification recognition will find a job at their qualification level. This share is adjusted to 50% for those not yet in employment prior to the qualification recognition.

Based on these assumptions, the aggregate reduction in employer-borne costs amount to EUR 4.7 million/year under PO1, EUR 15.6 million/year under PO2 and EUR 20 million/year under PO3.

6.1.4. Implementation costs

Implementation costs vary substantially across the three policy options, reflecting differences in the scope of digital infrastructure required at national and EU level. They are specified in further detail in annex 4.

Under **PO1**, costs are relatively limited, as implementation mainly builds on existing structures and focuses on mutual learning, exchange of best practices and voluntary convergence. The main cost drivers one-off costs at EU level of EUR 1–3 million, mainly for guidance, peer learning and analytical support, with only marginal and non-quantified costs for Member States.

Under **PO2**, costs increase significantly because the option requires both stronger cross-border interoperability and the development of additional EU-level support, notably a centralized service for authentication and verification of third country qualifications. This implies higher initial IT development and integration costs, as well as recurring costs for maintenance, operation of the infrastructure and the EU-centralised service and support. The overall cost burden remains uneven across Member States, depending in particular on the maturity of their existing digital infrastructure and the extent of system upgrades needed. One-off costs would be in the margin of EUR 27.3 – 47.9 million; yearly costs for operation around EUR 3.7 – 6.0 million. For the period until 2040, this would sum up to EUR 72 – 120 million, out of which around EUR 46 – 80 million would be borne by Member States and EUR 26 – 40 million by the EU level.

PO3 entails the highest implementation costs, as it combines the infrastructure needs of PO2 with the establishment of a public register supporting automatic recognition. In addition to the costs linked to database interoperability and EU-level authentication services, this option requires further investment in developing, operating and updating the register, as well as ensuring data quality, accessibility and governance arrangements. One-off costs would be in the margin of EUR 28.7 – 50.7 million; yearly costs for operation around EUR 3.9 – 6.5 million. For the period until 2040, this would sum up to EUR 76 – 128 million, out of which around EUR 46 – 80 million would be borne by Member States and EUR 30 – 48 million by the EU level.

Overall, while all options involve some adaptation costs, the scale and complexity of implementation increase markedly from PO1 to PO3.

Table 6.1: Total implementation cost for the 2027-2040 period, discounted to 2026 present values (3% discount rate).

	Baseline	PO1	PO2	PO3
Total costs borne by EU (discounted)	0.0 M€	1.0 - 2.9 M€	21.7 – 33.1 M€	24.8 – 40.2 M€
Total costs borne by MS (discounted)	0.0 M€	0.0 M€	39.4 – 69.0 M€	39.4 – 69.0 M€
Total (discounted)	0.0 M€	1.0 - 2.9 M€	61.1 – 102.0 M€	64.2 – 109.2 M€

6.1.5. Methodological uncertainty and sensitivity analysis

The estimated savings depend on the capacity and the incentives of the authorities concerned to deliver improved outputs within the common rules. The proposed framework relies on an established and tested institutional landscape, since the authorities that would apply the new instrument are those currently managing recognition procedures under the PQD and the legal migration acquis. These comprise several types of body with distinct governance and incentive structures, including ministries and migration authorities, independent professional regulators, chambers and professional associations exercising delegated public functions, and ENIC-NARIC centres¹⁶⁶. The evidence gathered for this IA indicates that the problem observed in practice is inconsistency, opacity and delay in the handling of third-country cases, precisely because no common procedural framework currently constrains the authorities' discretion in the way the PQD does for intra-EU cases. The common rules address this directly, and while MS retain the competence to designate the bodies involved¹⁶⁷, including bodies close to the professions whose position may raise a risk of self-interested gatekeeping (not evidenced in this IA), MS remain legally accountable under the Treaties for uniform application, subject to Commission enforcement and national judicial review (Chapter 9).

On capacity, the proposed deadlines are aligned with procedural approaches already familiar to the authorities concerned. Migration authorities already operate under deadlines set by the EU legal migration acquis which are in many cases at least as demanding as the proposed rules, for example the 90-day deadline for a decision on an EU Blue Card application compared with the proposed 3+1 months for the recognition component taken in isolation, and MS retain the principal lever for managing capacity pressures through their competence over admission volumes. Where migration authorities assess qualifications within migration procedures, these checks are in any event more limited and less time-consuming than full recognition procedures. Competent authorities for regulated professions, and the ENIC-NARIC centres on which some of them rely, are already used to complying with the same or similar deadlines for qualifications falling within the PQD or the Lisbon Recognition Convention. Additional capacity is expected from two sources, namely the digitalisation of intra-EU procedures under Action 2, which should free resources within the same authorities, and the automatic recognition channel under PO3, which replaces repeated case-by-case assessment with prior programme verification in the shortage professions where caseloads are heaviest. The efficiency gains underpinning the analysis derive from identified elements of the action, namely the EU authenticity assessment service, which absorbs a particularly time-consuming and technically demanding step of the process; the interoperable national databases, which reduce duplication of comparability assessments and allow authorities to rely more systematically on existing ones; structured cooperation through the dedicated expert group, supporting quicker access to information and more consistent decision-making; and the mandatory

¹⁶⁶ Cedefop (2026). Recognition and validation of foreign VET qualifications in Europe: Comparative insights for skills portability. Cedefop Insights No. 04. Luxembourg: Publications Office of the European Union. DOI: 10.2801/2307117

¹⁶⁷ A comparative mapping of national recognition and validation arrangements for foreign VET qualifications and skills found that CAs and recognition bodies are almost all public. Of the 73 named bodies across the 30 systems, about 93% are government departments, statutory agencies or public-law corporations. The remaining 7% are private-law foundations or associations that still carry out public tasks. See: Cedefop (2026b). Annex: Comparative Mapping of National Recognition and Validation Arrangements for Foreign VET Qualifications and Skills [Dataset].

coordination between recognition and migration authorities, which eliminates duplicate checks and rework.

On incentives, acute labour and skills shortages align the interests of professions experiencing shortages, employers and public authorities in integrating qualified talent rapidly into the workforce, while a simpler and more unified legal framework, the procedural support measures that reduce workload and the greater transparency of applicants' rights reinforce timely handling. Even under the baseline, demographic change and persistent shortages are increasing pressure on MS to devote more resources to the recognition of qualifications of TCN; the action provides the more coherent framework within which those resources can be used efficiently. The risk that the requirements are imperfectly implemented or enforced is factored into the quantified analysis through the realisation factors applied to each option, which discount the estimated savings to reflect that a partial-harmonisation directive may not be fully effective in practice, consistent with the Better Regulation guidance.

To reflect the inherent uncertainties surrounding baseline estimates, procedural volumes, and implementation effectiveness across 27 national systems, the quantitative impacts presented above are underpinned by the sensitivity analysis detailed in Annex 4.5.

Key parameters tested in the sensitivity framework include, among others:

- **Realisation Factors:** Realisation factors (60% for Policy Option 1, 75% for Policy Option 2, and 85% for the automatic recognition cases under Policy Option 3) reflect varying degrees of national transposition efficiency and administrative uptake. Under conservative scenarios (reducing the realisation factors by another 10 percentage points), annual aggregate administrative cost savings would amount to EUR 2.8 million, EUR 11.3 million and EUR 18 million for PO1, PO2 and PO3 respectively.
- **Baseline caseload:** As explained in more detail in Annex 4.2, the volume baselines are intentionally conservative considering the available evidence. Since application flows depend on various factors – such as geopolitical shifts and evolving migration policies – the sensitivity analysis includes a low-case scenario of 40,000 annual procedures (instead of 62,500). Under this assumption, the annual administrative costs savings for recognition procedures in regulated professions would be reduced to EUR 2.2 million, EUR 8.3 million and EUR 8.8 million respectively

6.2.Opportunity costs: Monthly opportunity costs were approximated using occupational wage proxies from the Eurostat Structure of Earnings Survey 2022, EU-27 aggregate¹⁶⁸), mean annual gross earnings, enterprises with 10 or more employees. If, in a conservative scenario, the opportunity cost proxies are reduced by 20% to EUR 640/month for those TCN that are working but overqualified and to EUR 3,440/month for those that remain unemployed during the recognition process, the monetised time savings amount to EUR 26.8 million/year, EUR 218.8 million/year and EUR 240 million/year for PO1, PO2 and PO3 respectively. **Wider Economic Impacts**

¹⁶⁸ 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.

All three policy options are expected to generate wider economic benefits compared to the baseline to the extent that they facilitate recognition of professional qualifications of TCN.

At **firm-level**, this results in **increased high-quality recruitment opportunities** relative to the baseline, enhancing **businesses' competitiveness and growth potential**. As per procedure costs and waiting times are reduced, employers can tap into a wider, geographically diverse pool of qualified TCNs, able to exercise the profession for which they have been trained.

The sizeable overqualification gap between EU citizens employed in their national labour market (20.2% in 2023) and TCN (38.9% in that same year)¹⁶⁹ suggests that there is a **considerable pool of untapped talent already present within the EU labour market**. Empirical evidence suggests that reforming recognition frameworks is a highly effective mechanism for unlocking this underutilised potential. Germany's "Federal Recognition Act" led to a 15% increase in the probability that non-EU migrants already residing in the country would apply for recognition. Faster and less cumbersome recognition processes improved labour market outcomes, resulting in an almost 20% increase in the employment of TCNs within regulated, high-skill occupations (such as healthcare and education), alongside measurable wage growth.¹⁷⁰

Facilitating recognition of qualifications as part of migrant procedures and for access to regulated professions would also **make the Union a more attractive destination for qualified TCN**. The evidence presented in Chapter 2 suggests that barriers to recognition of qualifications can act as a deterrent and that their removal would have a positive impact on the available pool of talent considering the Single Market as a destination. Even if total legal labour migration flows, as determined by MS migration policies, are kept constant, faster, less onerous and more predictable recognition procedures would improve the quality of matches between the supply of talent and skills demands in the EU. In this sense, **the action contributes to the effectiveness of EU migration instruments such as the Talent Pool and the Talent Partnerships**, and to the overall competitive position of the EU in the global race for talent.

The possibility to recruit from a broader pool of qualified TCN with skills that match their needs benefits all businesses. It is **particularly relevant for SMEs**, however, as they report the most difficulties in widening the recruitment pool beyond the borders of their national economy¹⁷¹.

¹⁶⁹ [Migrant integration statistics - over-qualification - Statistics Explained - Eurostat](#): overqualification gap between EU citizens employed in their national labour market (20.2% in 2023) TCN (39.6% in that same year)

¹⁷⁰ S. Anger, J. Bassetto, M. Sandner, [Making Integration Work? Facilitating Access to Occupational Recognition and Immigrants' Labor Market Performance](#), IAB Discussion Paper, 2022. For a correct understanding of the reported results, it is important to note that the study focused on the labour market integration effects of the reform, not on its impact on migration flows. The analysis therefore concentrates on immigrants who lived in Germany before the reform. Crucially, the study also notes that these gains were achieved without compromising professional quality standards or depressing wages, providing clear evidence that streamlined recognition effectively bridges the overqualification gap by aligning TCN talent with actual market needs.

¹⁷¹ Flash Eurobarometer 571 (December 2025) found that nearly half of all EU SMEs (46%) reported difficulty finding or recruiting staff with the right skills over the preceding 24 months, rising to 70% among SMEs actively hiring. Despite this, only one in seven EU SMEs (14%) had attempted to recruit TCN. 7 Qualification recognition challenges were cited by 13% of recruiters as a specific barrier, and by 8% of non-recruiting firms as a reason for not attempting international recruitment.

At **macro-economic level**, effective recognition procedures **reduce “brain waste” and overqualification**.¹⁷² By enabling residing qualified TCN to more easily access regulated occupations that match their training, they enhance the **allocative efficiency** and **aggregate productivity of the existing workforce**. They also ensure that newly arrived migrants are matched more quickly with positions aligned with their qualifications. This improves both the **total volume and the quality of the available labour supply** and helps to **address shortages in critical sectors**, thus supporting GDP growth. The size of these impacts depends on the share of TCNs who move into higher added-value jobs following recognition, on employer confidence in TCQs, and on the relative importance of other factors that influence the choice of the destination of TCN. The available evidence suggests that the effect of improved recognition on these both TCN labour market outcomes¹⁷³ and choice of destination is considerable.¹⁷⁴

All three policy options contribute positively to these firm-level and macroeconomic effects, though their impacts relative to the baseline vary.

Compared to the baseline, **PO 1** would reduce deterrence among TCN already navigating the system and improve the attractiveness of the Single Market as a destination for global talent by providing guidance to prospective TCNs as well as their (potential) employers on how to navigate applicable recognition procedures. Common EU tools would foster simplification of administrative procedures and increased alignment towards more efficient models. However, no binding rights are created, deadlines remain indicative and costs are only incrementally reduced. The effect on recruitment opportunities, improved allocative efficiency of the TCN workforce and on the total volume and the quality of the available labour migration pool is therefore expected to be limited, particularly for SMEs, for whom voluntary measures cannot eliminate the open-ended timelines and unclear fees that most directly undermine workforce planning.

Compared to the baseline, **PO 2** introduces a binding legal framework with common, more integrated and streamlined procedural rules that are expected to increase the incentives of TCNs already residing in the EU to apply for recognition and to make the EU more attractive to TCN. Procedural clarity and a more predictable framework with enforceable deadlines would also incentivise SMEs to engage more in international recruitment.¹⁷⁵ National databases on the comparability of TCQ would facilitate the sharing of information and expertise between MS and an EU-level authentication service would support MS authorities in their assessment procedures. These measures help foster a deeper understanding of and trust in qualifications obtained outside of the EU, thereby enhancing the effect of recognition on labour market outcomes.

¹⁷² The joint OECD and European Commission *Indicators of Immigrant Integration* report confirms that while immigrants are more likely to be overqualified almost everywhere, host-country degree recognition reduces this overqualification gap with native-born workers by 75% EU-wide, underscoring the central role of recognition systems in closing the gap.

¹⁷³ Cf. the study by Anger et alii quoted above which points at the improved labour market outcomes of TCNs residing in Germany following the recognition of their qualifications. The results of this analysis show a robust positive effect of degree recognition in increasing the number of high-skilled migrants by 30 to 60 percent.

¹⁷⁴ Czaika M., & Parsons C., *The Gravity of High-Skilled Migration Policies*, KNOMAD Working Paper 13 (March 2016). Utilizing a panel dataset tracking bilateral migration labour flows across 10 OECD destinations from 2000 to 2012 the paper shows a robust positive effect of degree recognition in increasing the number of high-skilled migrants by 30 to 60%.

¹⁷⁵ Approximately 39% of SMEs indicated in the consultation that simpler recognition procedures could at least moderately support their recruitment, underscoring the practical firm-level relevance of procedural simplification.

The impact on recruitment opportunities for and allocative efficiency of the TCN workforce is expected to be significantly positive at both firm and macro level.

Under PO3, compared to the baseline and in addition to the measures included under PO2, the automatic recognition system would further reduce the processing times of the concerned applications and contribute positively to the predictability of their outcomes. The impact relative to the baseline in terms of increased recruitment possibilities and the macro-level effects described above on over-qualification, the volume and the quality of the available labour supply is expected to also increase compared to PO 2. As the professions in scope are concentrated in the health care sector, PO 3 most directly address the issue of critical shortages in this sector, aligning the EU's offer more with the predictable, fast-track routes competitor destinations have established.

6.3.Social Impacts

Social impacts relate primarily to the situation of TCN navigating recognition procedures in the EU for employment purposes, covering employment opportunities and career mobility, undeclared work, access to essential public services, and fundamental rights. Impacts are also assessed against the European Pillar of Social Rights (EPSR), SDG 8 (decent work and economic growth, targets 8.5 and 8.8) and SDG 10 (reduced inequalities, targets 10.2 and 10.7). All three policy options are expected to have an overall positive social impact compared to the baseline, with binding options delivering greater and more consistent benefits.

Recognition barriers directly suppress **employment opportunities and upward career mobility** for TCN, but procedural improvements can translate into measurable labour market gains¹⁷⁶. **PO1** would help TCN navigate procedural complexity through guidance and voluntary simplification, though outcomes remain modest and uneven across MS in the absence of binding rights or deadlines. **PO2** reduces the complexity that discourages or delays applications through binding rules, sets documentation requirements and enforceable timelines, allowing employment opportunities to materialise more quickly and at lower cost. **PO3** combines PO2's procedural guarantees with an automatic recognition channel that substantially reduces practical barriers for TCN holding qualifications from verified programmes, significantly improving career prospects in the Single Market. **PO1** would improve transparency and access to information on recognition procedures, including through non-binding guidance on the use of EU tools such as the EQF¹⁷⁷. For young people, the non-binding nature of PO1 measures limits their likely impact to address their particular needs. **PO2** would go further, introducing common procedural rules that would reduce the unpredictability of recognition procedures and timelines. Binding measures on limits to document requests, and to provide documents in languages spoken by migrants, respond directly to calls for reduced administration and language barriers¹⁷⁸. **PO3** would bring the strongest effect for young people. By establishing equivalence of qualification levels for the professions and qualification types in scope, it eliminates the need for individual assessments entirely, removing

¹⁷⁶ As set out in Chapter 2

¹⁷⁷ The EU Youth Stakeholders Consultation for the SPI specifically highlighted the need for better implementation and awareness of EU tools, including the EQF.

¹⁷⁸ Input received during the EU Youth Stakeholders Consultation. Overview of Stakeholder Consultation in Annex 2.

the procedural burden at source and reducing the risk of underemployment at the start of a career for those whose qualifications fall within scope.

As to combatting undeclared work, prolonged and uncertain recognition procedures create structural incentives for informal work¹⁷⁹, both for TCN waiting out procedures and for employers in shortage sectors. **PO1** does not materially shorten the period of uncertainty during which informal work is most likely, as the absence of binding deadlines leaves the exposure window structurally unchanged. **PO2** substantially reduces that window through binding deadlines, set documentation requirements and streamlined coordination between recognition and migration authorities. **PO3** goes furthest for the seven sectoral professions, compressing processing times from 14.2 months to approximately 3 months in the care and health sectors where, undeclared employment of migrant professionals is most prevalent.

On access to essential services, healthcare workforce shortages are acute, structural and worsening, and cannot be addressed without continued inflows of qualified TCN professionals. The recognition procedure is a direct bottleneck on that inflow: at 14.2 months average duration, it delays or deters qualified professionals precisely where and when they are most needed. **PO1** leaves that bottleneck structurally unchanged, delivering only marginal improvements in service availability, with the most vulnerable regions continuing to bear a disproportionate share of unmet need. **PO2** accelerates integration through binding deadlines, with moderate positive effects on service availability in shortage sectors. **PO3** eliminates the bottleneck for the sectoral subgroup, compressing processing times to approximately 3 months and freeing CA capacity in the professions where shortages are most acute. Unlike intra-EU mobility measures, Action 3 brings new professionals into EU labour markets, providing net additionality for regions that cannot be served from within the existing EU workforce.

Regarding fundamental rights, all three options reduce procedural barriers to recognition, enhancing access to occupations and employment rights (Articles 15 and 20, EPSR Principle 4). **PO1** relies on voluntary uptake and compliance with tools but **PO2** and **PO3** introduce enforceable procedural guarantees (binding timelines, defined documentation requirements and appeal rights) giving TCN an effective remedy against procedural failures (Article 47) and supporting the right to good administration (Article 41). By enabling access to regulated professions commensurate with TCN qualifications, they improve fair and just working conditions and wages (Article 31, EPSR Principles 5 and 6). A common procedural baseline, applied regardless of nationality or country of qualification, strengthens non-discrimination protections and promotes equal opportunities (Articles 21 and 23, EPSR Principles 2 and 3). Under **PO3**, the automatic recognition channel for the seven sectoral professions addresses the undeclared work risk disproportionately borne by women in care and nursing, with a direct gender equality dimension (Article 23). **PO3** also advances equal treatment between TCN and EU citizens for the covered professions (Article 20), and tailored information and support for refugees under the measure strengthens protection for the most vulnerable applicants.

Digital measures under **PO2** and **PO3** must comply with GDPR and the EUDPR; no significant risks to personal data are anticipated, with the database and authentication service designed to apply the highest data protection standards in line with EPSR Principle 10.

¹⁷⁹ As set out in Chapter 2

6.4. Impact on digitalisation

PO2 and PO3 offer distinct contributions to the EU's broader digitalisation objectives by furthering digital integration of what are currently fragmented national systems, often operating in a hybrid, semi-digital manner. PO2 supports digitalisation by mandating the development of interoperable national databases for sharing comparability expertise, establishing a centralised EU-level service for digital authenticity checks, and allowing applicants to re-use digital verifications to eliminate administrative duplication. PO3 builds on this and adds a centralised, publicly accessible EU register of pre-verified training programmes and requiring qualifications to be issued by reviewed third country institutions as verifiable digital credentials. This shift replaces repeated, manual, case-by-case national assessments with a scalable, automated framework tailored to meet the volume and pace of skilled migration. Although it is not possible to estimate the exact size, even assuming the smallest reasonable impact, the option would still make a significant positive difference relative to the baseline.

6.5. Unintended consequences

The design of the action is informed by an awareness of potential unintended consequences, drawing on consultation findings, the experiences of MS active in international recruitment with the clear scope of the action on recognition procedures and not on admission criteria or migration volumes, which are Member State competence. Four categories of risk were identified and considered throughout the analysis.

Procedural quality and fraud prevention: Streamlining procedures does not entail a reduction in the substantive quality of recognition decisions. Member States will retain the capacity to make confident, well-informed assessments; the action supports this through mutual learning, shared comparability tools and an EU-level authenticity check service. This issue of fraud was raised repeatedly throughout consultation. The action recognises that this is an existing problem under current divergent systems, and addresses it directly in each policy option: tools for authentication (PO1); EU authentication service (PO2); issuance of digital credentials by reviewed third country institutions (PO3) to each enable systematic verification mechanisms.

Labour market integration outcomes: Faster recognition is a necessary but not sufficient condition for full labour market integration. Some TCN may continue to face employer discrimination, language barriers or conditions linked to migration status that fall outside the scope of this action. Similarly, overqualification may persist where structural labour market factors predominate. The action is coherently focused on the procedural barrier it can address; the sensitivity analysis of cost savings reflects this by applying conservative assumptions on the share of applicants who convert recognition into employment at qualification level.

Brain drain and ethical dimensions: The action does not stimulate migration or create new admission pathways; it improves the treatment of qualifications for those already entering through existing legal channels. Nonetheless, concerns about skills drain from partner countries, particularly in health, must be addressed in the communication and design of the action. As flagged in the description of PO3, the rollout of automatic recognition will be attentive to these dynamics, including through the Talent Partnerships framework, which is designed to support managed and mutually beneficial mobility.

Competitive effects: Concerns about competitive pressure on EU citizens are addressed through a consistent commitment to equal treatment. The procedural standards would apply uniformly and

do not confer any preferential status on TCN relative to EU citizens. Where administrative burden may shift such as under PO3 (where quality assurance requirements fall partly on third-country institutions) this is considered a proportionate consequence for third country institutions with an interest in structured labour mobility with demonstrated willingness to engage with such frameworks. Where review costs represent a barrier for institutions in lower-income origin countries, the Commission could consider co-financing arrangements for priority partner countries.

7. HOW DO THE OPTIONS COMPARE?

This chapter evaluates the relative performance of each policy option against baseline across three criteria: **(i) effectiveness** in achieving the specific objectives of the action; **(ii) efficiency** in terms of the balance between benefits and costs, monetised and non-monetised; and **(iii) coherence**, including with broader EU policy objectives and the EU policy landscape.

Options are scored relative to the baseline on a scale from '+' to '+++': a single '+' indicates a limited positive effect; '++' a moderate positive effect; and '+++ a significant positive effect. Equal weights are applied across criteria in the absence of a strong evidential basis for differential weighting. All three policy options are expected to generate positive effects relative to the baseline across all three criteria.

7.1 Effectiveness

PO3 is the most effective option across all three specific objectives, with a score of +++. Under SO1, the automatic recognition channel eliminates case-by-case assessment for the seven sectoral professions, replacing it with a uniform outcome for all holders of qualifications from verified programmes — the most direct structural response to fragmentation between and within MS. Under SO2, binding deadlines compress processing time from 14.2 months to approximately 4 months for the sectoral subgroup, document limits and multilingual document acceptance reduce per-application burden, and per-procedure savings reach approximately EUR 510 for automatically recognised applications. Under SO3, prior verification of third-country learning programmes against EU minimum training requirements replaces repeated case-by-case assessments with a systematic quality assurance foundation, substantially increasing the share of CA able to decide on the basis of a verified programme listing without requesting compensation measures. PO2 scores ++ across all objectives, delivering the same structural procedural improvements as PO3 for the general system but without the automatic recognition channel, leaving trust-building dependent on the authenticity service and comparability database rather than programme pre-verification. PO1 scores + across all objectives, as voluntary measures improve information availability and encourage convergence but cannot mandate coordination, enforce timelines or systematically address the knowledge and documentation asymmetries that drive compensation measure use. The effectiveness assessment takes account of the capacity, incentive and enforcement considerations analysed in Section 6.1.5, which are reflected in the realisation factors applied to the quantified estimates under each option.

Table 7.1 — Assessment of policy options against criterion of effectiveness

Specific Objective	Criteria	PO1	PO2	PO3
SO1: Streamlined recognition systems within and between MS	Reduction in duplication across recognition and migration procedures and increased alignment between national systems.	+	++	+++
SO2: Reduced legal and administrative complexity for recognition of	Reduction in processing times, documentation burdens and applicant-side costs.	+	++	+++

Specific Objective	Criteria	PO1	PO2	PO3
qualifications of TCN				
SO3: Increased trust and understanding of qualifications obtained in third countries	Increases in the share of CA with sufficient information to make timely decisions, and reduction in recourse to compensation measures.	+	++	+++

7.2 Efficiency

Efficiency is assessed by two dimensions. First, the difference between expected benefits and costs under each option (table 7.2); second, because not all benefits can be expressed in monetary terms, efficiency assessment takes into account also non-monetised benefits (wider economic and social impacts) as presented in sections 6.2 and 6.3.

All three options are efficient with net present value above zero and with positive wider economic and social impacts. PO3 is considered the most efficient option, with a score of +++. This is due to its ability to deliver high net present value. The binding coordination requirements and shared verification infrastructure (EU comparability database and authenticity check service) address the two principal structural inefficiencies directly and for all procedures, leading to substantial administrative cost-saving and time savings across different stakeholders, including applicants, CAs and employers. For the sectoral subgroup, automatic recognition brings important savings by replacing substantive per-case assessment with credential verification. PO3 also delivers high wider economic and social impacts across all assessed areas (increased high-quality recruitment opportunities, making the EU more attractive destination for qualified TCN, reduction of “brain waste” and overqualification, employment opportunities and upward career mobility, respect for fundamental rights, combat against undeclared work and improving access to essential services). Total efficiency for PO2 is ++ and for PO1 is +, reflecting their lower net present values and wider economic and social impacts. PO2 gains are smaller in the absence of automatic recognition, while the PO1 gains are smaller and uneven across MS given the non-binding nature of the measures.

Table 7.2 — Summary overview of cumulative monetised benefits and costs (present value in 2026)

	PO1	PO2	PO3
Benefits			
Administrative cost- saving – regulated professions (cumulative)	EUR 35M	EUR 134M	EUR 212M
Administrative cost- saving – migration related procedures (cumulative)	EUR 5M	EUR 19M	EUR 19M
Monetised time savings (cumulative)	EUR 346M	EUR 2824M	EUR 3098M

	PO1	PO2	PO3
Cost savings for employers (cumulative)	EUR 49M	EUR 161M	EUR 207M
Total	EUR 435M	EUR 3138M	EUR 3536M
Costs			
EU one-off implementation cost	EUR 1–3M	EUR 6-11M	EUR 8-14M
MS one-off cost (27 MS)	Marginal (0)	approx. EUR 20-35M	approx. EUR 20-35
EU recurring costs (cumulative)	0	EUR 15-22M	EUR 17-27M
MS recurring cost (cumulative)	0	approx. EUR 20-34M	approx. EUR 20-34M
Total	EUR 1-3M	EUR 61-102M	EUR 64-109M

Notes: ^aPresent values in 2026, using 3% discount rate. ^b Annual benefits for PO1 start to accrue in 2028 and up to 2040. Annual benefits for PO2 and PO3 start to accrue in 2029. ^cOne-off EU and MS implementation costs are equally spread between 2027 and 2028. Recurrent EU and MS costs start in 2029 and up to 2040.

7.3 Coherence

Coherence is assessed on consistency with broader EU policy objectives and policy landscape, in particular with EU talent attraction and Single Market objectives, without undermining or duplicating other initiatives and the EU simplification efforts .

PO3 delivers the strongest coherence with both dimensions, scoring +++. It directly aligns recognition for the seven sectoral professions with EU-level objectives on talent attraction, healthcare workforce supply and the Single Market, mirroring the logic already applied to EU citizens under the PQD and closing the gap between the procedural guarantees available to EU nationals and those available to TCN. By establishing a fully integrated recognition channel that is consistent and equivalent across all MS, PO3 provides the structural certainty that the EU's talent attraction instruments require to function as a coherent ecosystem. It most directly operationalises the EU's competitiveness and demographic agenda. PO2 scores ++, ensuring that EU talent attraction instruments can deliver on their promise: a TCN admitted on a Blue Card or prepared through a Talent Partnership is guaranteed a time-bound, procedurally consistent recognition procedure. By focusing on procedural rules rather than admission criteria, PO2 preserves national competence while creating a common operational baseline across MS. PO1 scores +, operationalising Commission Recommendation EU 2023/2611 through voluntary tools that complement the talent attraction ecosystem but cannot guarantee predictable procedures at national level, leaving the fragmentation that limits the ecosystem's effectiveness structurally unchanged.

The coherence of the options has also been assessed against the wider ecosystem of instruments addressing EU labour market needs, mapped in Annex 8. First, within the Fair Labour Mobility Package, the action is

complementary to, and does not overlap with, the other principal strands. The modernisation of social security coordination, including the European Social Security Pass (ESSPASS) and the strengthening of the European Labour Authority are Single Market instruments concerned with workers who are already present and moving within the Union. They do not address the recognition of qualifications which is the specific gap addressed by this action. They form part of the wider set of conditions shaping a TCN's experience of the EU labour market once admitted, particularly from a protection and enforcement perspective, rather than instruments interacting with the recognition procedure itself.

Second, the action is complementary to the EU Talent Pool Regulation. The Talent Pool can flag the applicable recognition procedures to registered jobseekers and employers, but it has no capacity to influence the nature, duration, cost or outcome of recognition itself. A TCN matched through the Talent Pool with an employer must still complete the full national recognition procedure under the same conditions that would apply in its absence, whether for a regulated profession, as part of a migration procedure, or both. This action addresses the procedure itself, so that the two instruments reinforce each other and will develop in parallel.

Third, within the SPI, Action 2 and Action 3 share the underlying objective of facilitating the mobility of regulated professionals and addressing skills shortages, but they address distinct personal scopes arising from different Treaty legal bases. Action 2 operates under the Single Market legal bases and modernises recognition for EU nationals exercising free movement rights, a personal scope which excludes TCN, whereas Action 3 operates under Article 79(2) TFEU and addresses TCN, for whom no comparable framework currently exists. By introducing a common framework that largely mirrors the PQD and incorporates several of the improvements developed under Action 2, Action 3 fills a gap in the existing *acquis* rather than duplicating Action 2, and its material scope is necessarily broader, extending to qualification checks conducted within migration procedures, including in relation to unregulated professions.

Fourth, as regards the EU's international obligations, coherence extends beyond the mutual recognition agreements discussed in Chapter 5. The schedules of commitments in EU free trade agreements make certain references to professional qualifications, particularly in services industries, and the WTO framework, notably the GATS, imposes general non-discrimination and most-favoured-nation obligations. These instruments establish framework-level commitments rather than operational recognition mechanisms, and the design of the options is compatible with them, since the common procedural rules apply to qualifications from all third countries alike and eligibility for automatic recognition under PO3 is determined by the functional verification of a training programme against defined EU minimum training requirements, applied on the same basis irrespective of the third country concerned, rather than by preferential treatment of specific trading partners. PO3 attaches recognition to individually reviewed programmes rather than to a partner country's system as a whole, keeping the level of assurance constant across countries. The common rules and the system of automatic recognition would in fact reinforce mutual recognition agreements and partnership arrangements, whether national or EU-level, by providing the stable and uniform framework on which they can build.

Table 7.3 — Assessment of policy options against criterion of coherence

Criteria	PO1	PO2	PO3
Consistency with EU talent attraction, Single Market objectives and EU simplification objectives	+	++	+++

7.4 Comparative overview

Table 7.4 — Overall assessment of policy options against the baseline

Criterion	PO1	PO2	PO3
Effectiveness	+	++	+++
Efficiency	+	++	+++
Coherence	+	++	+++
Overall score	3	6	9

Each policy option respects the principles of subsidiarity and proportionality. **PO1** imposes no new obligations on MS and is fully compatible as a non-binding option. **PO2** addresses procedural requirements without harmonising substantive assessment standards or affecting MS competence to take recognition decisions or manage migration and admissions. Its implementation obligations are proportionate to the improvements it delivers and sit within the established EU legislative tradition of minimum harmonisation in the field of qualifications. **PO3** measures are directly linked to the scale and persistence of the problems they address and are grounded in the existing framework of minimum training requirements under the PQD. Automatic recognition grounded in prior programme verification is a proportionate response that preserves MS competence over qualification standards and admission decisions; participation by third-country institutions is voluntary and the system will expand based on demonstrated interest by the institutions, limiting the risk of unintended effects on origin country skills systems.

8. PREFERRED OPTION

8.1. Policy Option 3

PO3 is identified as the preferred option. It is the most effective, efficient and coherent of the three options assessed, and it provides the appropriate overall policy response to the scale and persistence of the identified problems with recognition of qualifications of third-country nationals, while keeping and respecting the competences of MS in the areas of migration and professional regulation. The preferred option would be implemented through a proposal for a Directive, based on Article 79(2), points (a) and (b), TFEU, as set out in Section 5.2. Parallel amendments to Directive 2005/36/EC should be made as part of SPI Action 2 to ensure coverage of EU citizens holding third-country qualifications, as that Directive which addresses EU citizens is the appropriate instrument for this purpose.

PO3 meets the specific objectives of the action in the most direct and complete way. **Under SO1**, the binding common procedural rules establish, for the first time, a comprehensive framework governing recognition across all 27 Member States — eliminating the divergence that currently produces inconsistent outcomes for the same qualification assessed in different national systems — while the automatic recognition channel for the seven sectoral professions replaces repeated individual assessments using established EU standards. This represents a structural shift from a system defined by national fragmentation to one grounded in shared rules and mutual trust, with a clear dimension of EU added value that neither voluntary coordination nor procedural reform alone could deliver. **Under SO2**, binding procedural deadlines, documentation limits, transparent fee structures and a right of appeal establish a common procedural floor that applies consistently across all Member States, compressing processing times from the 14.2-month baseline to 4 months for automatic recognition procedures and to 5 months for the remaining ones. The per-procedure administrative burden would be reduced by approximately EUR 208 on the central estimate for non-automatic procedures and by EUR 510 for automatic ones. **Under SO3**, the system of automatic recognition, with the interoperable databases, and EU authentication service create a new foundation to address issues of trust,

providing a basis to increase the share of CAs able to decide on the basis of a verified programme listing without requesting compensation measures.

The current system imposes its heaviest costs (in time, money and skills waste) on precisely the professions where qualifications are most standardised, workforce shortages most severe, and case-by-case assessment most disproportionate to the risk it is designed to manage. Automatic recognition for those professions is the appropriate and proportionate response. PO3 does not remove Member State competence over qualification standards; it first establishes a core of simplified, common procedural rules, and secondly removes the redundant procedural burden of repeatedly re-examining applications from individual applicants from verified programmes. It restructures recognition around a logic of uniformity, trust, transparency and proportionality that the current system lacks and that the scale of identified labour market needs requires.

PO3 is also the most efficient option, generating aggregate cumulative net benefits that are substantially larger than PO2 and several times larger than PO1. Cumulative benefits over the assessment period are estimated at approximately EUR 3,536 million against total cumulative implementation costs of EUR 64–109 million, yielding a strongly positive net present value that is robust across all tested sensitivity dimensions. While PO3 entails higher EU-level implementation — EU one-off costs of EUR 8–14 million and cumulative recurring costs of EUR 17–27 million — these remain modest in relation to the scale of expected benefits.

PO3 also delivers the strongest coherence with EU policy objectives. It directly aligns recognition for the seven sectoral professions with EU-level objectives on talent attraction, healthcare workforce supply and the Single Market, mirroring the logic already applied to EU citizens under the PQD and closing the gap between the procedural guarantees available to EU nationals and those available to TCN. By establishing a fully integrated recognition channel that is consistent and equivalent across all MS, PO3 provides the structural certainty that the EU's talent attraction instruments — the EU Talent Pool, the Blue Card, and the Talent Partnerships — require to function as a coherent ecosystem. It most directly operationalises the EU's competitiveness and demographic agenda as set out in the Union of Skills communication and the European Council conclusions of March 2026.

8.2. REFIT (simplification and improved efficiency)

The initiative tackles recognition system inefficiencies through binding common procedural rules that are estimated to reduce certified translation needs by around one third, while a shared EU authenticity service will reduce the burden associated with verification of documents. Mandatory coordination between recognition and migration authorities eliminates duplicate qualification checks across parallel procedures, reducing avoidable exchanges and rework for both applicants and CA. For the seven sectoral professions covered by automatic recognition, processing times are projected to fall from 14.2 months to approximately 4 months, freeing CA capacity for complex cases. Employers stand to benefit from faster recruitment and more predictable timelines, with administrative costs for hiring a recognised professional estimated to fall by 35–50% for sectoral professions, generating indicative aggregate savings of EUR 14–30 million per year.

8.3. Application of the ‘one in, one out’ approach

There are no expected administrative costs for citizens and businesses arising from the initiative.

9. HOW WILL THE ACTUAL IMPACTS BE MONITORED AND EVALUATED?

9.1. Monitoring framework

The monitoring framework for the action is based on headline indicators for each specific objective, and identified data sources, including new streams coming from the implementation infrastructure. The framework will comprise the elements below and will be subject to further adjustment according to the final legal and implementation requirements and timeline.

- *Annual MS reporting:* From entry into force, MS will submit an annual standardised report covering: applications received; share of complete applications at first submission; average processing times; information exchanges per case; cases handled under the automatic recognition channel; and authenticity checks requested. The template will be kept short to minimise burden on national authorities.
- *EU shared infrastructure data:* The authenticity check service will generate operational data automatically — queries processed, average response times — available to the Commission and MS on a continuous basis and feeding directly into annual monitoring cycles without additional national reporting effort.
- *Stakeholder surveys:* Approximately two years after entry into force, the Commission will survey CA on early implementation experience and the functioning of new digital tools, and TCN applicants and employers, including SMEs, on user experience, procedure duration and administrative burden.

Monitoring is directly connected to enforcement, and the Commission will monitor compliance both in law and in practice. A first step will be a conformity assessment of the national transposition measures. The experience of the PQD demonstrates that a comprehensive conformity check enables the Commission to detect and address inconsistencies in national legal frameworks, including in areas involving a wide range of different competent authorities, and this ex ante review will also allow the Commission to verify that MS have put in place the institutional arrangements required for practical compliance, including structured cooperation between migration and recognition authorities where required.

Following the initial transposition check, the annual statistics provided by MS - covering outcomes, average processing times, information exchanges per case, authenticity checks, appeals and fees, will provide the basis for identifying systemic patterns of non-compliance. This data will be complemented by qualitative feedback and complaints received from TCNs, employers and other stakeholders and by the exchanges within the dedicated expert group.

Where the evidence points to an administrative practice incompatible with the Directive, the Commission may take enforcement action under the Treaties, while, in line with the Union's decentralised enforcement system, individual cases remain primarily a matter for national remedies and judicial review, supported by the right of appeal guaranteed under the common rules.

The elaborated framework is set out in Annex 14.

9.2. Evaluation

A formal evaluation will be conducted no sooner than seven years after the date of application of the legislation. The evaluation will assess the effectiveness, efficiency, coherence and EU added value of the measures, based on monitoring data collected throughout implementation. It will

examine in particular whether processing times and administrative costs have fallen, uptake of the automatic recognition channel by third-country institutions, and whether trust in TCQ among CA, migration authorities and employers has increased.

ANNEX 1: PROCEDURAL INFORMATION

Identification of the lead DG:

DG Employment, Social Affairs and Inclusion (DG EMPL) is the lead DG.

Organisation and timing

PLAN/2025/2650 Fair labour mobility package: Skills Portability 3: recognition of qualifications and skills of third country nationals

Commission work programme 2026, Supporting people, strengthening our societies and our social model - 25: Skills and fair labour mobility – Fair labour mobility package

The **Call for evidence**² providing an overview of the SPI, the 3 actions and envisaged policy options was published on 05 December 2025 and remained open for feedback until 27 February 2026 (a detailed assessment of the feedback received is provided in Annex 2).

The **Impact Assessment report** (IA report) is based on a number of studies and existing literature, reports and background research. A study from an external contractor was launched in October 2025 to inform the IA report.

In addition, **extensive targeted consultations** were conducted on this action between October 2025 and April 2026.

Previous consultations were also taken into account in the preparation of the IA report in particular for development of the Proposal for a Regulation of the European Parliament and the Council establishing an EU Talent Pool.

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 Union of Skills. A specific sub-group (technical steering committee to the support studies of the IA) on the Skills Portability Initiative was created. The representatives of the following Directorates-General participated in the ISG work: BUDG, CNECT, COMM, EAC, ECFIN, EEAS, EMPL, ENV, ESTAT, GROW, JUST, JRC, INTPA, MOVE, NEAR, REFORM, REGIO, RTD, SANTE, TRADE, SG and the Legal Service.

The ISG met 3 times to discuss the SPI, namely on 16 September 2025 (meeting on the overall Union of Skills with a dedicated point on the SPI), on 26 March 2026 (to discuss preliminary elements of the three SPI IA) and on 27 May (to discuss the three IA before their submission to the Regulatory Scrutiny Board).

The steering group for the external study supporting the IA on SPI Action 3 met on 13 October 2025 for the kick-off meeting, on 20 November 2025 to discuss the draft Inception report and on 19 March 2026 to discuss the draft Interim report. The draft Final report was discussed by written procedure with a deadline for comments by 3 June 2026.

Bilateral meetings with other Commission services

Furthermore, DG EMPL has held a number of bilateral meetings with several Commission services including DG HOME and DG RTD.

On 31 March 2026 and 20 April 2026 a joint meeting with HOME and LS was organised to discuss key aspects for the design of SPI Action 3.

External meetings and consultations

SPI Action 3 touches upon different policy areas including, migration, employment and recognition of qualifications related aspects. Therefore, extensive consultations were conducted with a wide range of stakeholders and experts from different backgrounds. Meetings and ad-hoc consultations with EU institutions and agencies, international organisation, MS, expert groups, high-level groups, think tanks, and civil society were organised. A full overview of the consultations conducted is available in Annex 2.

Consultation of the Regulatory Scrutiny Board

On 15 June 2026, DG EMPL submitted the draft IA to the Regulatory Scrutiny Board, which examined the draft IA on 15 July 2026.

The Board issued a positive opinion with reservations on 17 Month 2026. The Board pointed to a number of elements of the IA that should be addressed. The table below summarises the main recommendations for improvement, and how they have been addressed in this IA report.

Main recommendations for improvement	Modifications in the IA report
Better substantiate the magnitude of the problem and isolate it from other factors shaping TCN destination choice; draw more on existing evaluations (Annex 8) to support the problem definition and drivers.	Added text acknowledging destination choice reflects many factors but showing recognition is the one EU-regulable determinant, and that the problem also affects TCN already resident. Brought forward Annex 8 information (Legal Migration Fitness Check, Single Permit and Blue Card IAs) into Chapter 2.
Explain how a uniform approach will be ensured given MS flexibility, and how rules on deadlines, document lists and fee transparency will actually be enforced.	Added text on the legal instrument (Directive, Art. 79(2) TFEU) clarifying enforcement mechanism (transposition/conformity check, practice-based monitoring via annual statistics, expert-group exchanges) in the PO2/PO3 sections and Chapter 9.
Better explain the role, selection and governance of the envisaged EU quality assurance agencies under PO3, and how the EU-wide QA channel relates to existing national approaches.	Added detail on trusted review bodies, approval validity, renewal and withdrawal conditions. Added text/footnote evidencing existing MS–third country curriculum-alignment initiatives to show the EU channel is complementary, not competing.
Analyse whether CAs have the capacity and incentives to meet shorter deadlines without raising costs, what drives the assumed	Added a new section (6.1.5, methodological uncertainty and sensitivity) covering CA/migration-authority typologies and incentive structures, the specific sources of

efficiency gains, and the range of CA types, governance and enforcement risk.	efficiency gains (authenticity service, interoperable databases, mandatory coordination), and confirming enforcement risk is captured via the realisation factors.
Provide evidence of third-country institutions' interest in, and willingness to bear the costs of, automatic recognition; present benefits/monetisation more cautiously, specifying assumptions and their sensitivity.	Added evidence on institutional uptake drawing on existing MS-led curriculum-alignment projects as a proxy for demand. Added an explicit sensitivity analysis (Annex 4.5) testing realisation factors, baseline caseload and opportunity-cost assumptions, referenced in the main text.
Strengthen coherence analysis against the wider ecosystem (EU Talent Pool Regulation, other SPI actions), synergies with Action 2's digital solution, and specify the type of legal act proposed.	Added a four-part coherence analysis (Fair Labour Mobility Package, EU Talent Pool Regulation, Action 2, international trade obligations) and specified the Directive under Art. 79(2)(a)–(b) TFEU as the proposed instrument, mirroring the PQD. Clarified why use of a potential digital work flow (similar to SPI Action 2) is not feasible in section on discarded options.

External consultant

An external contractor (consortium led by EY Italy in collaboration with the Istituto Ricerca Sociale (IRS)) has assisted DG EMPL by conducting a study to support the work on the IA report. The call for tenders for the study was launched on 25 July 2025, three substantive bids were evaluated in October 2026, leading to the award decision on 16 October 2025. The kick-off meeting for the study took place on 24 October 2026, an inception report was delivered on 16 December 2025 and a draft interim report on 3 March 2026. The final report for the first reviews cycles was submitted on 30 April 2026.

Evidence and Sources

This IA draws on a broad and layered evidence base assembled through desk research, a comprehensive literature review, inter-service consultation, targeted expert consultations and focus group discussions. Quantitative analysis is grounded in numerical estimates and calculations derived from primary data collection complemented by triangulation with external datasets and secondary sources. Qualitative evidence draws on expert assessments, stakeholder position papers and the outputs of structured consultation activities.

The source base spans EU institutional documentation, UN and ILO instruments, OECD labour market and migration analyses, peer-reviewed academic literature, and sector-specific studies on labour and skills shortages, labour migration, and labour market inclusion. A full list of sources consulted is provided in the Annex 15 Resources.

ANNEX 2: STAKEHOLDER CONSULTATION (SYNOPSIS REPORT)

1. Consultation Strategy

The objective of the consultation process for SPI Action 3 was to collect the views of MS and relevant stakeholders on EU action to improve the recognition of qualifications and the validation of skills of TCN. Targeted consultations provided stakeholders with an opportunity to contribute to the development of the IA, including the identification of problems to be addressed, the assessment of policy options, and the analysis of potential impacts. The consultations sought to gather both objective data and evidence to inform the IA, and views, opinions and concerns about possible policy responses and their likely impacts.

Commission services carried out an initial mapping of relevant stakeholders comprising: EU institutions and agencies; CA in MS; EU-level networks of non-governmental organisations; subject-matter experts; economic and social partners; trade unions; international organisations; and employer associations.

Outcomes of bilateral meetings with MS, held in December 2025 and January 2025 as part of the follow-up to Commission Recommendation EU 2023/2611, were also analysed for the considered in analysis stakeholder views. A summary of these meetings is included below in part 7.

2. Overview of Consultation Activities

The consultation process drew on four main methods of engagement.

2.1 Call for Evidence

The Call for Evidence was published on 5 December 2025 on the Commission's Have Your Say platform and remained open until 27 February 2026. A total of 235 stakeholders provided feedback, accompanied by 125 position papers. Respondents included umbrella organisations, economic and social partners, civil society organisations (CSO), public authorities and EU citizens.

2.2 PC

A PC was conducted in parallel with the Call for Evidence, running from 5 December 2025 to 27 February 2026. It generated 785 responses in total, of which 486 were retained for analysis as relevant to Action 3. Respondents included TCN (61), EU citizens with TCQ (37), public authorities (81), academic and research institutions (44), non-governmental organisations (43), business associations (41), companies and businesses (29), trade unions (11) and other stakeholders (56).

2.3 Targeted Consultations Conducted by the Commission

Between October 2025 and April 2026, Commission services organised targeted consultations in the form of bilateral meetings, thematic focus groups and written exchanges. A discussion document and questionnaire were shared in advance of each meeting. The full list of consultation activities is set out below.

Consultation activity	Date
Meeting with EurHeCA (European Health Professionals' CA)	2 October 2025
Meeting — Alignment on "Choose Europe" (Attracting Researchers)	22 October 2025
Groningen Declaration Network Meeting	29–30 October 2025
EU Youth Stakeholders — Targeted Consultation	6 November 2025
European Migration Network Advisory Group	6 November 2025
Adult Learning Coordinators	14 November 2025
Regular Network Meeting — VET Providers	18 November 2025
European Federation of Nurses	18 November 2025
Pharmaceutical Group of the EU (PGEU) — General Assembly	19 November 2025
Validation and Recognition Working Group	25 November 2025
Geodesks	27 November 2025
Eurochambres Skills Committee	3 December 2025
Group of Coordinators for Professional Recognition	4 December 2025
Youth Guarantee Coordinators	5 December 2025
Annual NARIC Meeting	11 December 2025
EQF Advisory Group	16 December 2025
ENIC-NARIC Network	January 2026
National Europass Centres — Dedicated Meeting	13 January 2026

Consultation activity	Date
ESCO and National Classifications Experts — Dedicated Meeting	14 January 2026
Talent Partnership Delegations	14 January 2026
Cross-Border Regions Stakeholders — Dedicated Meeting	16 January 2026
Public Employment Services (PES) — Targeted Consultation	20 January 2026
Social Partners Hearing	23 January 2026
Cross-Border EURES Projects	27 January 2026
ENIC-NARIC Network — Dedicated meeting on SPI	28 January 2026
EURES National Coordination Offices	28 January 2026
VET Stakeholders	29 January 2026
IOM Webinar with private sector stakeholders	9 February 2026
EU Labour Mobility Practitioners Network Flash Focus Session	19 February 2026
Micro-credentials Masterclass	24–26 February 2026
European network of CA for architects (ENACA)	6 March 2026
Prague Process / ICMPD	11–12 March 2026
Labour Migration Platform	26 March 2026

2.4 Targeted Consultations

A series of surveys, focus groups and targeted interviews were undertaken, with the support of the external contractor.

Targeted Surveys

Survey	Respondents	Coverage
CA for regulated professions	190	AT, BE, DE, EE, ES, FI, FR, HR, HU, IE, IT, LT, LU, LV, MT, NL, PL, PT, RO, SE, SI, SK
Labour migration authorities	48	AT, BE, BG, CZ, FR, HU, IE, IT, LT, MT, NL, PL, PT, SE, SK
ENIC-NARIC centres	18	BE, BG, EE, FI, FR, EL, ES, HU, IE, IT, LT, LV, NL, NO, RO, SE, SI, SK
TCN and EU citizens with TCQ	155	—
SME Panel Survey	159	The dedicated SME panel survey captured the specific experiences and views of small and medium-sized enterprises to gather their understandings of the costs, administrative burden and expected benefits associated with EU-level action.

Focus Groups

Seven thematic focus groups were conducted between 16 February and 14 April 2026.

Focus group	Participants	MS covered
National CA — electricians and crane operators (9 March 2026)	20	EE, ES, FI, HR, IT, LT, LU, MT, NL, SE
National CA and EU professional organisations — healthcare (13 March 2026)	31	AT, DE, EE, ES, FI, IE, LT, LU, MT, NL, PL, SE
Labour migration authorities and international organisations (3 March 2026)	28	BE, CZ, ES, FI, FR, HU, IE, LT, MT, NL, PL, SI

Focus group	Participants	MS covered
ENIC-NARIC centres, PES and CSO (5 March 2026)	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 (17 March 2026)	27	AT, BE, DE, DK, ES, IT, NL, RO, SE
TCN (19 March 2026)	12	—
Automatic recognition for selected professions (14 April 2026)	23	BE, FI, FR, LT, NL, PL, SI NZ, NO, ZA, TR, GB ETF, UNESCO

Targeted Interviews

Six scoping interviews were conducted during the inception phase (2–18 December 2025) with representatives of DG EMPL, DG HOME, DG SANTE, the ETF and the ICMPD. A further 44 targeted interviews were conducted between 20 January and 21 April 2026 with the following stakeholders.

Stakeholder group	Organisations / countries covered
CA 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)	HOSPEEM, BusinessEurope, SMEUnited, FIEC
HR departments and recruitment organisations (6)	Work in Finland Unit, Business Finland, Carinthian International Centre, Fragomen, Working Studying and Living in Germany, World Employment Confederation, EY HR Department
International organisations (6)	ECPDM, IOM, ITCLO, OECD, UNHCR, WHO
CSO (5)	Jesuit Refugee Services, Advisory Council on Migration, Solidar Foundation, Lifelong Learning Platform, Women Migrants in Malta

Stakeholder group	Organisations / countries covered
EU professional organisations (5)	CPME, EFN, UEMO, IRU, European Council of Engineers Chambers
Other stakeholders (3)	ENIC-NARIC centres and Public Employment Services

3. Summary of Consultation Findings

3.1 Targeted surveys

Survey evidence from CA (n=190), migration authorities (n=48) and ENIC-NARIC centres (n=18) consistently points to significant problems in procedural duration, administrative burden, cost exposure and trust.

Lengthy and unpredictable procedures: Recognition decisions are rarely delivered within one month; 40% of authorities report average timelines of one to three months, and 36% report timelines of three to six months from the date of a complete application. Migration authorities report limited visibility on timelines, with 50% indicating that additional processing time linked to qualification checks within migration procedures is unknown.

Heavy documentary requirements: All responding CA require more than ten documents, often in original paper form, with certified translations widely required. 64.6% of migration authorities state that applications cannot proceed when documentation is missing or incomplete.

Cost barriers: Application fees range from zero to over EUR 2,000 depending on the MS and profession, with medical doctors and dentists consistently facing the highest costs, frequently exceeding EUR 1,000.

Trust deficits: 57.1% of CA identify verification of authenticity as a principal challenge, while 60.5% report only moderate or low trust in evidence of TCQ. Almost 90% of ENIC-NARIC respondents report significant difficulties in recognising TCQ.

3.2 Focus Groups

Seven focus groups provided in-depth qualitative insights across a broad range of professions, institutional roles and MS. The principal findings are as follows.

Fragmentation within and between MS. Recognition and skills validation procedures are highly fragmented both between MS and within national systems. Documentation requirements, assessment criteria and the use of compensatory measures vary substantially across MS, largely driven by national legal frameworks and governance traditions. Within MS, overlapping responsibilities between sectoral regulators, education authorities, ENIC-NARIC centres, migration authorities and public employment services result in parallel procedures and duplication of checks.

Institutional silos between migration and recognition procedures. Qualification checks embedded in migration pathways are not consistently aligned with recognition processes carried out by education or professional authorities, contributing to uncertain outcomes for both applicants and employers.

Lack of accessible information. 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.

Procedural complexity, timelines and costs. Recognition procedures are characterised by uncertain timelines, particularly in the healthcare sector due to detailed curriculum comparisons, public-interest safeguards and compensatory measures. Burdensome documentation and translation requirements constitute a major bottleneck, with third-country national participants describing particular difficulties in retrieving documents from countries of origin in contexts of conflict, displacement or weak administrative systems. Total costs are frequently unclear at the outset and can be sufficiently high to discourage applicants from pursuing or completing recognition procedures.

Trust deficits and quality assurance gaps. Document verification processes are largely manual and resource-intensive. Insufficient knowledge of third-country education systems and curricula drives cautious, case-by-case decision-making. The mere existence of quality assurance systems or qualifications frameworks in third countries is considered insufficient to enable trust or facilitate more systematic forms of recognition without comparable, verifiable and practice-oriented information on how those systems operate in reality.

3.3 Strategic Interviews

There is broad consensus among stakeholders that difficulties in the recognition of qualifications and the validation of skills of TCN constitute a major structural barrier to effective labour market integration and to addressing persistent labour shortages. Refugees, beneficiaries of international protection and some categories of family migrants were identified as facing the greatest obstacles.

Recognition systems are widely described as fragmented, slow, costly and difficult to navigate, with significant variation across MS and limited transparency for both migrants and employers. Stakeholders broadly agreed that EU-level action could add value by fostering trust, pooling recognition decisions and knowledge, improving information availability, and promoting common principles or minimum standards while fully respecting national competences. Most interviewees expressed caution about binding EU legislation, citing the political sensitivity of migration policy and subsidiarity of education systems, and expressed broader support for softer EU instruments such as guidelines, common principles, interoperability tools and structured information exchange frameworks.

3.4 Targeted Interviews

Forty-four targeted interviews explored legal and policy barriers, administrative challenges and coordination mechanisms across MS. The principal findings are as follows.

Complexity as a deterrent. Complex, lengthy and fragmented recognition procedures discourage TCN from pursuing employment in the EU and reduce employers' willingness to recruit them, contributing to skills underutilisation and recruitment bottlenecks particularly in shortage sectors.

National silos and limited coordination. Recognition systems operate largely in national silos with limited cross-border coordination, leading to diverging procedures, duplicated checks and inconsistent outcomes for equivalent qualifications. Neither TCN nor employers can easily obtain clear, comparable and authoritative information on recognition requirements across MS.

Skills underutilisation and labour shortages. Persistent labour shortages coexist with long-term underutilisation of third-country national skills. Rigid recognition procedures delay or prevent labour market entry, disproportionately burden SMEs with limited administrative capacity, and tend to channel TCN into lower-skilled employment.

Misalignment between migration and recognition frameworks. Limited coordination between migration rules and recognition requirements leads to repeated checks, delays and, in some cases, inability to complete recognition due to residence or visa constraints.

Limited employer capacity. Employers, especially SMEs, lack the tools and knowledge needed to interpret TCQ and skills profiles, leading to conservative recruitment practices or outright exclusion of third-country national candidates. Validation of non-formal and informal skills remains largely employer-driven and inconsistently applied.

Documentation as a barrier for the most vulnerable. Additional documentation requests are frequently difficult or impossible for TCN to meet, particularly for refugees and asylum seekers, exacerbating delays and leading to exclusion from recognition pathways.

4. Economic and Social Partners

A dedicated hearing with social partners was held on 23 January 2026. Social partners also participated in the European Labour Migration Platform, which included a dedicated presentation on SPI Action 3. The positions of key organisations are summarised below.

4.1 Social Partners Hearing

Trade union and public service organisations raised a series of cross-cutting concerns about the treatment of TCN under the action. OGBL stressed that the scope and concrete content of Action 3 remain insufficiently clear, particularly regarding its practical implications for migrant workers, and underlined that interlinked issues such as social security coordination and family reunification are closely connected and should be explicitly acknowledged. ETUC emphasised that immigration cannot substitute for good working conditions and must not become a mechanism for creating cheap labour, noting that women workers are disproportionately affected by exploitation and abuse; it also pointed to the Ukrainian temporary protection experience as a useful model for standardised approaches to the recognition of prior learning. EPSU identified language barriers as a key structural obstacle and cautioned that recruiting TCN cannot resolve skills shortages as long as working conditions remain insufficient, adding that drawing care workers from other MS risks shifting rather than solving shortages, to the particular detriment of female migrant workers. ETUCE welcomed efforts to improve the recognition of TCQ but stressed the need for robust comparability mechanisms to prevent any lowering of standards.

4.2 Position Papers

Organisation	Summary of position
Joint Employers Input (BusinessEurope, SMEUnited, SGI Europe)	Broadly welcome the initiative as relevant to addressing labour shortages and supporting EU competitiveness. Support minimum procedural standards to reduce processing times and burdens, improved guidance and information through EU delegation offices in partner countries, voluntary guidance and methodology for

Organisation	Summary of position
	recognition and validation of skills, access to temporary work while recognition is pending, and expanded Talent Partnerships.
Eurochambres	Support exploring practical ways to improve recognition, particularly in shortage sectors. Call for clearer procedural standards, shorter timelines, greater predictability, fully digitalised procedures including interoperable digital certificates, and structured partnerships with third countries. Caution against additional binding legislation, citing national business communities in Germany and Italy as seeing no immediate legislative need. Prefer flexibility and temporary employment during recognition over new regulatory requirements.
SMEUnited	Welcome skills portability efforts as a key enabler of SME competitiveness. Identify burdensome, multi-stage and fragmented procedures as the central structural obstacle, compounded by lack of centralised information and disproportionate impact on SMEs. Call for streamlined, sector-sensitive procedures modelled on the approach adopted for Ukrainian qualifications, SME-friendly digital tools and tailored advisory services. Support a non-legislative EU approach and stress the need to address broader integration barriers including language, housing and financial access.
Ceemet	Welcome the intention to simplify procedures, describing existing processes as extremely bureaucratic and a major disincentive for workers and companies alike. Endorse the 2023 Commission Recommendation and swift deployment of the EU Talent Pool. Note that for MET industries, immigration rules rather than qualification recognition constitute the primary obstacle. Support simplification and digitalisation, call for social partner involvement from the outset, and stress the need for any new scheme to be unbureaucratic and accessible for SMEs.
ETUC	Welcome faster and better-resourced recognition procedures, framing non-recognition as a structural vulnerability that increases workers' dependence on employers and exposure to lower pay and social dumping. Insist that any recognition framework must be tied to equal pay, equal treatment and collective bargaining coverage, with the right to challenge decisions and request reassessment. Call for accelerated and standardised recognition drawing on the Ukrainian model, subsidised sworn translation costs and dedicated funds for lower-income applicants. Call for social partner participation at all stages and oppose any outcome resulting in

Organisation	Summary of position
	automatic downgrading of qualifications or erosion of national qualification systems.

5. PC Results

Demand for and Experience of Recognition: Among third-country national respondents, 27.9% had already applied for recognition of their qualifications and 63.9% planned to do so in the future. Among EU citizens with TCQ, 36.8% had completed recognition and a further 36.8% planned to apply. The main motivations were consistent across groups: 70.2% sought recognition to improve access to employment commensurate with their qualification level, and 53.6% to support career progression and improve pay or working conditions. Among TCN specifically, 39.3% reported that recognition was linked to visa, residence or work permit requirements, confirming the close interplay between recognition and migration frameworks.

Duration and Costs: Recognition procedures were reported to be relatively short for most respondents. 61.3% of those who had completed procedures reported total durations of up to six months, while 22.6% reported durations of between six months and three years, with no meaningful differences between TCN and EU citizens with TCQ. Costs varied widely: 35.5% reported total recognition costs of between EUR 1 and EUR 250, while 12.9% reported costs of between EUR 501 and EUR 1,000 including application fees, certified translations and document legalisation, reflecting substantial variability across MS and professions.

Labour Market Outcomes: Respondents frequently associated recognition processes with negative labour market effects. Among those who had completed recognition procedures, 32.3% reported missing a job opportunity, 19.4% had accepted employment below their qualification level or expected pay, and 13% experienced delays in starting employment. A smaller share reported having changed occupational field or left the EU due to recognition-related difficulties. Only 5.9% reported exclusively positive outcomes.

Employer Practices: Employers reported varied assessment practices when recruiting TCN. 75% request formal proof of qualifications and 60% rely on credentials issued by an official authority, while 45% use structured interviews and 40% rely on competency-based tests or practical assessments. Only 15% require formal validation by a competent authority. Formal recognition was frequently reported as a response to external compliance requirements — 50% indicated recognition was required due to public procurement or subsidised contract obligations — rather than as an employer preference. Trust in micro-credentials remains limited, though acceptance rises to 35% where learning outcomes, training providers and quality assurance arrangements are clearly identifiable.

Interaction Between Recognition and Migration Frameworks: Responses clearly highlight the interaction between recognition and migration frameworks. Respondents consistently reported that delays or uncertainty in recognition directly affect access to employment, residence security and mobility. Employers and other stakeholders provided examples of qualified TCN who were legally present in a MS but unable to work at their skill level while awaiting recognition decisions required for permit issuance or renewal.

Validation of skills: Formal validation of skills remains limited in practice: only 6.6% of third-country national respondents and 5.3% of EU citizens with TCQ had completed a validation procedure. However, interest is considerable, with 65.6% of TCN and 44.7% of EU citizens with TCQ planning to pursue validation in the future. Among those not intending to do so, 65.7% identified lack of awareness as the principal barrier, suggesting that low uptake is driven primarily by information gaps rather than low perceived value. Where validation had taken place, durations ranged from less than one month to six months, costs were generally low, and impacts were similar to those reported for qualification recognition.

Key Challenges and Support for EU Action: The challenges most frequently identified across all respondent groups were: fragmented and non-uniform recognition procedures across MS (67.9%); limited understanding of TCQ by employers (62.4%); lack of trust in qualifications obtained outside the EU (43.8%); and limited understanding of skills acquired outside the EU (41.6%). Support for EU-level action is strong: 75.7% of respondents considered it very necessary to simplify recognition and validation procedures, a further 19.8% considered it somewhat necessary, and more than 70% considered attracting skilled non-EU nationals important or very important for their sector or country.

6. Stakeholder views on the Policy Options

9.2.1.1.1. Stakeholder views on Policy Option 1: Soft measures to enhance procedures for the recognition of qualifications of TCN

PO1 is the least contested of the three options in terms of stakeholder acceptance — most stakeholders support the soft-law measures it contains as a necessary baseline — but views differ significantly on whether it is sufficient to address the problem.

GoC written contributions, March 2026

Stakeholder group	Position and key arguments
Belgium (Flanders, PQD coordinator)	Challenged the premise that existing instruments are inadequate, arguing that the Lisbon Recognition Convention (LRC) and the Global Recognition Convention (GRC) provide effective and underused frameworks for higher education that are not referenced in the Commission's analysis. Concerned that the problem statement overstates systemic failure in recognition systems.
Belgium (Flemish Community)	Echoed the LRC/GRC point in Dutch. Suggested that Option 3 is potentially the most promising in the short term, targeting specific important professions and specific third countries with significant application volumes — comparable to the architects MRA model with Canada.
Germany	Conceivable in principle. Germany already provides comprehensive multilingual information on recognition ('Recognition in Germany' portal, 11 languages). Flagged the importance of digital solutions and AI tools for TCQ, and called for EU tools to interface with existing national digital solutions. Emphasised that any EU action must be compatible with existing national systems.
Lithuania	Supportive as a starting point. Flagged authentication of third-country documents as the major challenge and noted that national systems may legitimately reflect specific national contexts (shortage professions, geographic proximity). Questioned whether procedural harmonisation could be sufficient.

Stakeholder group	Position and key arguments
Poland	Saw Option 1 as a good starting point, particularly the integration of information through EU Talent Pool and Talent Partnership entry points. Supported expanded IMI use and mutual learning. Raised doubts about whether voluntary measures could reduce complexity sufficiently without prior investment in information collection on TCQ. Noted third countries are not homogeneous in terms of quality assurance.
Romania	Supported strengthening existing mechanisms as a necessary foundation. Flagged the importance of online recognition procedures (already implemented in Romania for regulated and non-regulated professions) and extending IMI to TCQ.
Sweden	Noted that the Swedish system for recognition of TCQ is relatively limited and varies across authorities; only four of fifteen relevant authorities have established systems. Supported strengthened IMI and an AI tool covering TCQ.

TCN

The TCN survey and PC responses identify information gaps and procedural opacity as primary barriers to initiating recognition. 60.9% of TCN use official government websites as their main information source, but 53% describe requirements as only 'somewhat clear' and 21.3% as 'not clear at all'. PO1 information and guidance measures are directly responsive to these expressed needs. However, TCN respondents consistently note that improved information does not reduce the underlying procedural costs (average EUR 1,500 per procedure), processing times (average 14.2 months actual) or outcome uncertainty (44.8% did not obtain full recognition). Pre-departure support under Talent Partnerships is seen as beneficial for applicants outside the EU; for those already in a MS, the information gap is secondary to procedural barriers.

Employers and SMEs

Employers value improved information and see pre-departure guidance as a concrete benefit. The SME Panel Survey (2026, n=159) documents that 68% of respondents identify reduced administrative burden during recruitment as the primary anticipated benefit of a more common EU recognition framework, and 61% identify faster recruitment processes. BusinessEurope and SMEUnited support the soft-law measures but note that non-binding tools are unlikely to deliver the consistent and predictable simplification that SMEs require, given their limited HR capacity. 70% of employer respondents in the PC identified faster and more transparent procedures as a structural factor in attracting qualified TCN professionals. Focus group FG5 participants (n=19–26) confirmed that information asymmetry is a real obstacle but that it is secondary to procedural uncertainty and document verification complexity.

CA

In the CA survey (Q39, n=190): 47% consider EU intervention would improve the efficiency of daily tasks to a large or moderate extent; 48% expect it to enhance simplification and harmonisation; 74.7% identify tools to verify document authenticity and prevent fraud as among the most helpful EU-level measures; and 38.4% selected guidance and best practices to streamline procedures. The modal expectation (Q37, n=94–118) was a small decrease in internal staffing costs from soft-law measures. CA expressed strong support for the non-legislative, capacity-building and coordination measures underpinning PO1 — but identified the absence of an IMI-equivalent for third countries as a structural gap that guidance cannot fill.

Healthcare professional organisations

The focus group with healthcare CA and professional associations (FG2, n=31, including CPME, EFN and UEMO) welcomed capacity-building and information-sharing measures. Representatives noted that better information on TCQ systems would reduce reliance on conservative case-by-case assessments driven by information deficits. No objection was raised to the soft-law elements of PO1.

9.2.1.1.2. Stakeholder views on Policy Option 2: Common rules to streamline procedures

PO2 attracts the broadest cross-stakeholder interest. Employer, TCN, CSO and professional organisation respondents are broadly supportive of binding procedural minimum standards. MS positions are more nuanced, with several emphasising the importance of avoiding additional administrative burden and maintaining alignment with existing national frameworks.

GoC written contributions, March 2026

Stakeholder group	Position and key arguments
Poland	The most explicitly supportive MS. Common rules modelled on — but adapted from — the PQD general system could deliver for TCN the same consistency and predictability achieved for EU citizens under the PQD. If the rules and their application are the same across EU, there is trust in the process. Suggested a directive as the appropriate instrument. Noted that rules cannot be a carbon copy of the general system, as third countries differ greatly in quality assurance standards.
Romania	Conditional support. Supported Option 2 if no new administrative burdens are imposed and no discrimination is created relative to EU citizens. Called for alignment of deadlines, documentation requirements and right of appeal with Directive 2005/36/EC rules for regulated professions. Flagged the practical difficulty of reducing deadlines given authentication requirements for TCN documents. Noted the risk of a 'first recognition' transition phenomenon (TCN seeking first recognition in more flexible MS before moving elsewhere) and called for this mechanism to be reviewed.
Sweden	Noted that CA need clearer legal support for recognising TCN qualifications — a binding framework could provide it. IMI is not developed for third countries, creating an information and cooperation gap. Trust in qualifications and verification tools are key.
Germany	Sceptical. No demonstrated need for new EU regulation. Binding measures for regulated health professions not welcomed as mandatory requirements. Individual measures could potentially simplify procedures in addition to existing German systems only on the basis of more concrete proposals. Suggested limiting scope to highly qualified workers (Blue Card Directive) or to regulated professions.
Lithuania	Did not specifically address Option 2, but implied support for more structured approaches by noting that procedural harmonisation alone is insufficient and that authentication of documents is the core challenge — an issue that Option 2's EU authenticity check service (A8) and comparability database (A9) directly address.

TCN

TCN are strongly supportive of binding procedural guarantees. The three measures most directly responsive to TCN experiences are: (i) binding deadlines — 70.4% consider procedure length a

big or very big problem and 36.3% report processes lasting over one year; (ii) documentary discipline — TCN describe excessive documentation requirements and repeated requests for additional documents as among the most burdensome aspects; and (iii) transparent fees — financial unpredictability is identified as a barrier to initiating procedures, particularly for TCN with precarious residence status. The indicative combined applicant-side burden reduction under PO2 (EUR 1,500–2,500 per procedure on the central scenario) reflects the magnitude of the improvement that binding procedural standards could deliver.

Employers and SMEs

Employers are broadly supportive. 88% of focus group FG4 respondents (n=11) expected a very positive impact from a binding common framework. BusinessEurope and SMEUnited explicitly identify bureaucratic complexity and limited digital processes as the primary obstacles and support common rules as a structural improvement, particularly for SMEs that cannot absorb the costs of fragmented national procedures. The SME Panel Survey documents anticipated savings of 26–36% across cost categories from a common EU digital recognition framework — savings consistent with the PO2 per-procedure reduction of 15–22% on direct costs plus the reduction in opportunity costs from the binding deadline. Employer respondents in the PC (n=118) consistently identify procedural simplification and digital credentials as the main factors that would reduce the employer-borne burden (70% of focus group FG5 respondents).

CA

In the CA survey: 27.9% consider that EU intervention would enhance simplification and harmonisation to a large extent; 25.3% to a moderate extent; and 51% believe it would contribute to more predictable recognition outcomes. Common rules on deadlines, documentation, appeals and compensation measures were identified by 25.3% of CA as among the most helpful measures. Healthcare CA in the focus group described the misalignment between recognition and migration timelines as a major source of delays, directly addressed by the binding coordination requirements under measure A2. Several CA called for clearer assessment criteria and additional resources, which are addressed by measures A9 (EU comparability database) and A8 (EU authenticity check service).

Civil society and international organisations

CSOs supporting TCN, including Jesuit Refugee Services and the Solidar Foundation, welcome binding procedural guarantees as tools to reduce the structural vulnerability of TCN whose residence status is contingent on recognition outcomes. The ETUC highlighted in the PC that delayed or failed recognition creates structural dependency on a single employer, and trade unions flagged that rigid recognition processes can lock TCN into precarious employment — concerns that binding procedural guarantees, right of appeal and coordination requirements under PO2 are designed to address. The IOM supported binding coordination between recognition and migration authorities as essential to resolving the structural misalignment documented across MS.

9.2.1.1.3. Stakeholder views on Policy Option 3: Common rules including automatic recognition

PO3 attracts strong interest from employers, professional organisations, TCN and several MS, who see automatic recognition as the most effective tool for addressing structural labour shortages in the covered professions. The option generates the strongest reservations among authorities responsible for regulated health professions, who emphasise quality assurance and patient safety concerns.

GoC written contributions, March 2026

Stakeholder group	Position and key arguments
Romania	A public register of verified TCQ would facilitate recognition and reduce administrative costs. Procedures must remain rigorous to guarantee compliance with professional and training standards. Emphasised the importance of country-by-country approaches and verification of programme quality.
Belgium (Flemish Community)	Identified Option 3 as potentially the best approach in the short term: select specific important professions and specific third countries with high application volumes, assess which qualifications are acceptable for those professions. Compared the model to the EU-Canada architects MRA. Suggested this targeted approach is more realistic than comprehensive options 1 or 2.
Lithuania	Conceptually interesting; more information on feasibility needed. Acknowledged that automatic recognition is among the most effective available tools, with substantial benefits for applicants and CA. Requested further detail on governance and implementation.
Poland	Acknowledged that automatic recognition would significantly improve recruitment and reduce processing times in shortage sectors. However, cautioned that this is a very ambitious goal given the wide variation in third-country education system quality. Urged a country-by-country rather than one-size-fits-all approach. Stressed that employers and service users must be assured that automatically recognised applicants actually meet the professional requirements of the host MS. Recommended a mixed practical and theoretical aptitude test to complement the programme verification process.
Germany	Firmly rejected mandatory automatic recognition for the regulated health professions on quality assurance and patient safety grounds. Automatic recognition of partial qualifications from third countries is not an option; access to regulated professions can only be granted following a full equivalence assessment. Indicated that voluntary participation could be examined if measures are further developed.
Sweden	Noted that trust in qualifications and access to verification tools would be crucial if this approach is implemented.

TCN

TCN are the stakeholder group with most to gain from automatic recognition and are strongly supportive. A significant share of TCN are currently deterred from initiating recognition procedures by the length and unpredictability of the process and by the prospect of not obtaining full recognition — factors that generate latent demand well above observed application volumes. For the seven sectoral professions in scope, automatic recognition compresses the procedure from the 14.2-month baseline and eliminates compensation measures within the automatic recognition route, addressing two of the most significant barriers identified in TCN survey responses.

Employers and SMEs

Employers are strongly supportive, particularly in healthcare and other shortage sectors. The European Hospital and Healthcare Employers' Association (HOSPEEM) and employer participants in the GoC focus group (FG2) confirmed that lengthy and variable recognition timelines

significantly obstruct workforce planning in shortage conditions. The SME Panel Survey documents that the employer-borne cost reduction for sectoral professions under Policy Option 3 is in the order of 35–50%, driven by the automatic recognition channel and use of digital credentials enabling near-immediate employer-side verification. Focus group FG5 participants (70%) identified procedural simplification and digital credentials as the primary factors reducing the employer-borne burden — both central to Policy Option 3's design.

CA, ENIC-NARIC centres and professional organisations

Healthcare CA in FG2 (n=31) expressed the strongest reservations: processing times are difficult to shorten without compromising regulatory obligations, curriculum comparisons are substantively necessary in healthcare, and the imposition of compensation measures often reflects genuine qualification gaps rather than administrative inertia. The Standing Committee of European Doctors (CPME), the European Federation of Nurses (EFN) and the European Union of General Practitioners (UEMO) all emphasised that quality assurance must take precedence and that automatic recognition should be conditional on a robust, independently verified equivalence assessment. These concerns are addressed in the design of Policy Option 3 through the prior verification mechanism (EU quality assurance agencies conducting on-site visits), time-limited approval with renewal conditions, and MS oversight through participation in review teams and a second-assessment trigger.

Among NARIC centres¹⁸⁰, 11 of 18 expect EU action to enhance simplification and harmonisation to a large or moderate extent; 10 of 18 expect it to contribute to more predictable outcomes; and 8 of 18 consider it would improve trust in TCQ to a large extent. The most frequently selected measure among migration authorities is the use of trusted lists or tools to verify qualifications (28 of 48, Q25, n=48), followed by standardised document requirements (18 of 48) — both consistent with the infrastructure underpinning Policy Option 3 (the public register of approved programmes and use of digital credentials).

Cross-cutting concern: the 'transition phenomenon'

Romania raised (supported by Estonia, Italy, Portugal, Cyprus, Slovakia, Croatia and Hungary) at the GoC meeting a concern about TCN seeking first recognition in MS with more flexible rules before moving to work in another. Romania called for this mechanism to be reviewed as part of any legislative framework. This concern applies to PO2 and PO3 and could be addressed through minimum standards that prevent a race to the bottom, consistent with the principle that procedural minimum rules apply uniformly across MS.

7. Summary of bilateral meetings with MS as part of follow-up to Commission Recommendation EU 2023/2611 of 15 November 2023 on the recognition of qualifications of third-country nationals

As part of the follow-up to Commission Recommendation EU 2023/2611, the Commission invited each MS to participate in an online bilateral meeting to gather information on current MS actions to facilitate recognition of qualifications of third country nationals (including the measures included in the Commission Recommendation) and discuss possible future initiatives in this policy

¹⁸⁰ NARIC Survey (n=18)

area. Meetings were held with 20 Member States in December 2024 and January 2025. The meetings were informal in nature to facilitate exchange of views.

See below a summary of the main findings which emerged from the meetings:

Fragmentation and decentralisation

One of the most persistent barriers to the effective recognition of qualifications is the fragmented nature of national recognition systems. In many cases, responsibilities are divided across multiple authorities, including federal or regional governments, professional associations, and sector-specific bodies. In decentralised systems, requirements can vary not only by profession but also by region, making it difficult for third-country nationals to navigate the process.

For example, in some cases, regulated professions—such as teachers, engineers, and healthcare workers—are assessed at the regional level, while academic and vocational qualifications fall under national ministries. The result is often disparities in processing times, documentation requirements, and procedural steps depending on the applicant’s intended place of work.

In contrast, some Member States have adopted more centralised models, where a single agency or ministry oversees the recognition of foreign qualifications. These systems tend to be more efficient, as they provide a single point of contact for applicants and ensure greater consistency in decision-making. Digital solutions, such as recognition portals, online application tracking, and national databases, are increasingly being used to simplify access to information.

However, despite efforts to streamline national systems, applicants often face widely different recognition processes depending on their country of destination. Some recognition bodies support greater EU alignment, arguing that inconsistent national policies create barriers to mobility and unnecessary duplication in qualification assessments. Others insist that recognition rules must remain flexible, as labour market needs differ significantly between Member States and even within regions.

Verification and Fraud Prevention

A major challenge in recognition procedures is ensuring the authenticity and reliability of third-country qualifications. Many Member States report difficulties in verifying foreign qualifications, accreditation status, and training quality, particularly from regions where education systems are less regulated or where fraudulent qualifications circulate.

Traditional approaches to verification often require certified translations, notarised copies, and document legalisation, which can create significant delays in processing. Some countries are now experimenting with more flexible approaches, such as accepting simple copies instead of certified versions or allowing employers to initiate the recognition process on behalf of the applicant, thereby reducing waiting times.

Several Member States are also exploring AI-driven verification tools to detect fraudulent documents and speed up authentication. However, challenges remain, as incomplete databases, inconsistent record-keeping, and legal barriers limit the effectiveness of automated systems. Some authorities have found that direct partnerships with origin countries—including employment agencies and educational institutions—can improve document validation and reduce fraud risks.

One emerging approach is a partnership with third countries model, which allows professionals to complete training abroad according to the destination country's standards, eliminating the need for lengthy recognition procedures upon arrival.

Despite these efforts, trust in third-country qualifications remains a key issue, particularly in highly regulated fields. Some Member States advised that recognition bodies stress the importance of enhancing EU-wide collaboration to develop standardised assessment tools for common countries of origin, reducing repetitive verification procedures across different Member States.

Healthcare sector

Among all professions, the healthcare sector faces the greatest challenges and most pressing need for reform in qualification recognition. Severe shortages of doctors, nurses, and other medical professionals have led many countries to introduce special recognition pathways to bring third-country healthcare workers into the workforce more quickly.

Common approaches include:

- Fast-track procedures for skilled workers, allowing employers to initiate recognition on behalf of applicants.
- Temporary employment solutions, enabling healthcare professionals to work in supervised roles while completing additional training or exams.
- Knowledge-based testing models, which allow applicants to prove competency through exams instead of undergoing full qualification assessments.

To address language barriers, many countries now offer integrated language and vocational training courses, combining technical language instruction with sector-specific learning. In some cases, employer-sponsored language programmes are included as part of recruitment and retention strategies.

However, despite these adaptations, several barriers remain:

- Strict qualification standards, requiring lengthy adaptation periods before full recognition is granted.
- Regional variations in recognition, meaning that an applicant may qualify in one jurisdiction but not in another.
- Retention issues, with a significant percentage of recognised professionals leaving after a few years, reducing the long-term impact of recognition efforts.

To improve retention, some governments have introduced structured induction and mentoring programmes, ensuring that foreign healthcare professionals receive adequate support, cultural training, and career development opportunities. A potential area for greater EU collaboration is the mutual recognition of training and adaptation measures, allowing professionals who have completed recognition in one country to have their qualifications more easily recognised elsewhere.

Future EU Cooperation

Member States presented differing view between those advocating for more harmonisation and those emphasising national flexibility. Some policymakers argue that disparities in recognition systems create inefficiencies, prevent the full use of skilled migrant labour, and result in duplicated efforts across the EU. Others stress that national recognition rules must remain adaptable to sectoral and regional differences, as well as specific labour market conditions.

There was broad agreement, however, on the need for greater EU coordination in specific areas, including:

- A shared qualifications database, enabling authorities to verify foreign qualifications more efficiently.
- Mutual recognition of assessments for common countries of origin, reducing administrative burdens.
- Investment in digitalisation, including AI-based verification, automated translation, and online application tracking.
- Greater alignment of adaptation measures for highly regulated professions, such as healthcare and engineering.

Reducing bureaucratic burden through mutual recognition of qualifications was highlighted as a key priority, so that a recognition decision in one EU country can serve as a basis for other Member States, rather than requiring repeated assessments. Some countries also support an EU-wide approach to ethical recruitment, ensuring that foreign professionals are not exploited and that recognition processes contribute to sustainable workforce integration.

Cooperation on verification tools, digitalisation, and standardised assessments could help address labour shortages, improve efficiency, and create a fairer, more transparent recognition system across Europe. The challenge ahead is to find a balanced approach that respects national autonomy while ensuring that recognition systems remain fit for purpose in an evolving labour market.

ANNEX 3: WHO IS AFFECTED AND HOW?

1. Practical implications of the action

For the Commission

- Prepare and propose a legislative proposal necessary to introduce binding common procedural rules and the automatic recognition mechanism for selected professions under the preferred option.
- Monitor and support the implementation of the new framework using the standard enforcement tools available under EU law.
- Facilitate exchanges of best practice, common understandings and operational coordination on the application of the new framework within relevant MS expert groups
- Develop, operate and maintain the EU-level infrastructure underpinning the preferred option, including the EU authenticity check service and the system for automatic recognition of qualifications for selected professions,

For Member States and national authorities

- Transpose the legislative act into national law and adopt the necessary implementing measures at national level.
- Ensure effective coordination between national coordinators, CAs and MAs responsible for recognition procedures.
- Instruct and support CAs and MAs on the practical application of the new rules to simplify procedures.
- Adapt internal workflows, administrative practices and, where necessary, IT infrastructure to support streamlined procedures for recognition of qualifications of TCN.
- Respect the harmonised rules on fees, procedural deadlines and appeal rights established under the legislative act.
- Regularly provide updated statistics and cooperate effectively with the Commission and other Member States to support monitoring and evaluation.
- Draw the attention of the Commission and other MS to shortcomings, implementation difficulties and areas requiring further attention or improvement in the practical application of the new framework.

For third-country education and training institutions

- Submit an application for programme review against EU quality assurance standards and the minimum training requirements established under the PQD for the relevant sectoral profession, and bear the costs of that review.
- Cooperate fully with the review process, including by providing complete documentation and facilitating on-site visits where required.
- Issue qualifications from approved programmes as verifiable digital credentials compatible with the EU register.
- Maintain continued compliance with the conditions of approval, notify the Commission of any material change to an approved programme, and cooperate with renewal assessments to remain listed in the public EU register.

2. Summary of benefits and costs

The tables below summarise the benefits and costs associated with the preferred policy option (PO3 — Common rules including automatic recognition for selected professions). Benefits are expressed in monetary terms where the nature of the underlying effect and the available evidence support monetisation, consistent with the methodological framework (Annex 4). Where monetisation is not feasible, a qualitative direction-of-impact statement is provided.

Table A3.1- Overview of benefits — Preferred Option: Policy Option 3

Description	Amount	Comments
<i>Direct benefits</i>		
Per-procedure administrative cost savings for applicants and CAs	Approx. EUR 169-247 for non automatic recognition procedures in regulated professions AND approx EUR 420 – 599 per automatic recognition procedure. Approx. EUR 25-38 for migration-related recognition procedures in unregulated professions.	The total administrative cost for a recognition procedure in regulated professions is estimated at EUR 1,100 for applicants and EUR 400 for CAs. The savings would stem primarily from 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.
Aggregate annual administrative saving at system level	Approx. EUR 22.3 million/year	Estimated on the baseline of 62,500 recognition procedures/year for regulated professions and 62,500 migration-related procedures.
Monetised time saving for applicants from reduced opportunity cost during the recognition waiting period	Approx. EUR 300 million/year	Reduction of 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.
Reduction in employer-borne administrative cost in cross-border recruitment of TCN	Approx. EUR 20 million/year	Baseline employer-borne administrative cost estimated at approximately EUR 800–1,200 per recruitment of a recognised third-country national.

Description	Amount	Comments
<i>Indirect benefits</i>		
Increased high-level recruitment opportunities for individual firms	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 (healthcare, construction, transport etc).
Reduction of “brain waste” and overqualification	Not directly monetised, significant positive direction	By enabling residing qualified TCN to more easily access regulated occupations that match their training, faster and less cumbersome recognition processes enhance the allocative efficiency and aggregate productivity of the existing workforce.
Enhanced EU attractiveness for global talent	Not directly monetised; positive direction.	More predictable, simpler and faster recognition reduces a structural deterrent for skilled TCN to consider the EU as a destination for legal labour migration. It also ensures that newly arrived migrants are matched more quickly with positions aligned with their qualifications. This improves both the total volume and the quality of the available labour supply.
Increased employment opportunities and upward career mobility for TCNs	Not directly monetised; significant positive direction.	The combination of procedural guarantees with the possibility of an automatic recognition channel for specific learning programmes substantially reduces practical barriers for TCN holding qualifications to exercise their preferred professions.

Description	Amount	Comments
Protection of fundamental rights	Not directly monetised; significant positive direction.	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 TCN. Standardised and enforceable procedures under PO 3 reduce the scope for inconsistent or discriminatory application of recognition rules.
Combatting undeclared work	Not directly monetised; significant positive direction.	Increased clarity and shortening waiting times for recognition reduce incentives for both workers and employers to engage in undeclared work

Table A3.2- Overview of costs — Preferred Option: Policy Option 3

	Citizens / TCN	Businesses (incl. SMEs)	Public administrations
Direct adjustment costs	One-off: nil — no new compliance obligation on third-country applicants. Recurrent: nil.	One-off: marginal HR adaptation costs for employers operating in regulated sectors with active cross-border recruitment of TCN (familiarisation with the new recognition framework, including the automatic-recognition route for sectoral professions); not separately quantified. Recurrent: nil.	One-off (MS): Substantial MS-level adaptation costs for enhanced interoperability of national database on the comparability of TCQ (mapping to common standards, connector implementation, testing, and onboarding). One-off (EU): Setting up of infrastructure to support the interoperability of national databases, the EU service for the assessment of authenticity of third country qualifications, and the functioning of a system of automatic recognition of eligible third country qualifications (public registry). Recurrent (MS): Maintenance and support of national systems for continued interoperability. Recurrent (EU): Maintenance and support of the above-mentioned EU-level digital infrastructure; operation of a central EU service for the assessment of authenticity of third country qualifications.
Direct administrative costs	NA	NA	NA

For further detail see ch. 6.1.4, and annex 4.6

Table A3.3 - Contribution to the administrative burden reduction targets – Preferred option(s)

Administrative costs [M€]	New recurrent costs (INs) (nominal values per year)	Removed recurrent costs (OUTs) (nominal values per year)	Net cost (INs – OUTs) (nominal values per year)	New one-off costs (INs) (annualised total net present value over the relevant period)	Removed one-off costs (OUTs) (annualised total net present value over the relevant period)
All businesses	N/A	N/A	N/A	N/A	N/A
- in which SMEs	N/A	N/A	N/A	N/A	N/A
Public administrations ^a	N/A	Overall administrative cost savings estimated at EUR 22m per year. Savings would be predominantly for TCN, as they bear the biggest share of costs in baseline (EUR 1100 vs 400 for CA out of total EUR 1500). Nevertheless, some savings are expected also for CA, but precise estimate/breakdown is not available	N/A	N/A	N/A
Third country national s	N/A	EUR 20.5M (regulated profession procedures) EUR 1.8M (migration-related procedures]	N/A	N/A	N/A

Notes: ^a The initiative target TCN, so the category is relabelled. TCN can include also those who are already residing in the EU, but precise estimate/breakdown is not available

3. Relevant Sustainable Development Goals

SPI Action 3 is relevant to two of the United Nations Sustainable Development Goals, as follows:

Table A3.4 Overview of relevant Sustainable Development Goals – Preferred Option(s)

Relevant SDG	Expected progress towards the Goal	Comments
SDG 8 Decent Work and Economic Growth	Expected reduction in barriers to labour market participation for TCN seeking recognition of qualifications in the EU. Under PO3: per-procedure administrative cost reduction of approximately EUR 329 (central estimate); processing times for the seven sectoral professions reduced from 14.2 months to approximately 4 months; aggregate annual welfare gain from reduced waiting-period inactivity in the order of magnitude of EUR 300 million per year.	Targets 8.5 (full and productive employment and decent work for all) and 8.8 (protect labour rights and promote safe and secure working environments for all workers, including migrant workers): the initiative directly supports access to employment at qualification level for TCN, reducing overqualification and skills waste. It addresses the particular vulnerability of TCN whose employment and residence status may depend on recognition outcomes, and reduces structural incentives for undeclared work arising from prolonged procedural uncertainty. Consistent with SDG 8 targets on reducing the NEET rate and the overqualification gap, both disproportionately high among young TCN.
SDG 10 Reduced Inequalities	Expected reduction in structural barriers faced by TCN in accessing host-country labour markets, with particular benefit for low-wealth applicants, early-career professionals and those whose qualifications are issued by systems less familiar to EU competent authorities. PO3 eliminates individual assessment for the seven sectoral professions in scope, removing the regressive entry cost disproportionately borne by first-time applicants without institutional support.	Targets 10.2 (empowerment and inclusion of all, irrespective of national origin) and 10.7 (facilitate orderly, safe, regular and responsible migration and mobility): the initiative reduces inequality of access to regulated professions based on national origin by establishing a common procedural floor across all MS. Mandatory timelines, documentation and fees reduces scope for inconsistent or discriminatory application of recognition rules. The procedural guarantees introduced under PO2 and PO3 are particularly relevant for TCN whose migration status creates compounded legal and financial vulnerability relative to EU nationals exercising free movement.

ANNEX 4: ANALYTICAL METHODS

This annex describes the analytical framework used in the impact assessment. It outlines the **data sources**, specific **techniques employed for data collection**, and the **analytical methods used to quantify potential impacts**. Additionally, the annex discusses the **limitations of the available data** and the **underlying assumptions** to ensure a balanced and informed interpretation of the findings.

The methodological approach relies on the insights and methodologies from the external study on the “Study on a proposal for EU rules on the recognition of qualifications and validation of skills of third country nationals”, complemented by internal analyses and further comprehensive stakeholder outreach.

10. OVERVIEW OF ANALYTICAL METHODS

This impact assessment is underpinned by a mixed-methods research framework designed to build a highly robust and multi-layered evidence base. The following methods were used:

- **Data mapping:** A structured mapping exercise was conducted to identify relevant, reliable, and up-to-date information, prioritizing EU-wide sources. These included, but were not limited to, official EU statistics (Eurostat), national statistical reports, relevant policy documents, academic literature, and research reports from international organizations such as the OECD and network such as the European Migration Network. The evidence gathered through this secondary research, including key statistical findings, macro-economic trends, and qualitative assessments, is directly integrated into the body of the report to substantiate the underlying baseline analysis.
- **Literature review:** Emerging academic and institutional research on the recognition of qualifications and the validation of formal and informal skills was explored to gather insights into the bottlenecks, administrative hurdles, and socioeconomic impacts associated with existing recognition frameworks. The review assessed recent scholarly publications, peer-reviewed journals, and institutional studies. Relevant qualitative and quantitative assessments and theoretical insights were integrated in the report.
- **Targeted stakeholder consultations:** A series of targeted consultations was conducted between October 2025 and April 2026, combining institutional mapping with field research supported by an external contractor. This involved inception-phase scoping interviews and over 40 targeted interviews with CAs, EU employer umbrella organizations, HR departments, IOs, CSOs. Additionally, targeted surveys gathered quantitative insights from 190 CAs across 22 Member States, almost 50 labour migration authorities, 18 ENIC-NARIC centres, over 150 TCNs. A dedicated SME Panel gathered insights from 160 companies. Seven thematic focus groups were conducted involving 178 total participants—including regulatory bodies, healthcare professional organizations, labor migration experts, and TCNs.
- **Public consultation:** a broad-based public consultation was carried out alongside a Call for Evidence from December 5, 2025, to February 27, 2026, using the Commission's *Have Your Say* platform. The Call for Evidence yielded 235 feedback submissions and 125 detailed position papers from umbrella organizations, social partners, and public authorities. Simultaneously, the public consultation generated 785 total responses, of which 486 were strictly retained as relevant to the initiative. This respondent pool provided a balanced mix of direct users and institutional stakeholders.
- **Economic and statistical analysis:** The data analysis aimed to identify the problem, quantify its magnitude, forecast its trajectory without policy intervention, and evaluate

the impacts of the selected policy options. This process relied on the collected evidence, estimates and several assumptions detailed in this Annex.

11. BASELINE – NUMBER OF RECOGNITION APPLICATIONS

The baseline caseload is estimated in three steps presented below in a step-by-step analytical manner, including the underlying assumptions and main limitations:

- In a first step, the **annual volume of first residence permits** was estimated 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.¹⁸¹ This yields approximately 125,000 first residence permits issued per year for skilled workers. 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.
- In a second step, **the share of first residence permit applications pertaining to regulated professions was estimated**. Since migration databases do not record the regulatory status of the job, this share was estimated triangulating five independent pieces of evidence: i) a bottom-up estimate from the survey of competent authorities; ii) a 2024 EMN Ad Hoc Query providing administrative data on medical doctor recognition in 10 Member States¹⁸² and iii) statistical data on the case load of recognition procedures for all regulated professions initiated by TCN in Germany¹⁸³; iv) a small-scale study by the IOM on the conditions of entry and residence of third-country high-skilled workers in AT¹⁸⁴ and v) a

¹⁸¹ Eurostat dataset: [\[migr_resoccl\] 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).

¹⁸² 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 this total represents a single profession (medical doctors) across only ten responding MS, it validates that the overall volume of applications for regulated professions across all 27 MS sits comfortably above this floor, supporting the credibility of the central estimate of 62,500 annual applications.

¹⁸³ Official federal tracking data indicates that Germany experienced a historic high caseload of approximately 71,000 new recognition applications in 2024 (representing a 14% year-on-year increase), the majority of which were submitted by TCN (58,455 applications). According to Destatis (2025), of the 58,455 applications submitted by TCNs, 45,912 (79%) were for regulated professions. This figure provides a second 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 MS sits comfortably above this floor, supporting the credibility of the central estimate of 62,500 annual applications. Given that it represents the case load for all regulated professions 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.

¹⁸⁴ 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,

focus group cross-check based on the data forms returned by the Member State authorities. The 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.**

Since they refer to **two distinct types of recognition procedures** the two caseload baseline figures are kept separate, and contribute to the cost savings estimations presented in Chapter 6 in different ways. The 62,500 recognition applications in the context of regulated professions represent the most time and resource-intensive cases, as they rely on a comprehensive case-by-case assessment of the professional qualifications of the applicant against the legal requirements to exercise a specific profession. The remaining share of migration-related procedures involving an element of qualification assessment are less onerous and time-intensive for the applicant as, in this context the assessment takes the form of a verification of diplomas or the application of a standardized point system rather than a comprehensive evaluation of the professional qualifications.

Methodological consistency with the SPI Action 2

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). Nevertheless, the relationship between the two estimates is methodologically coherent on the basis of the following three considerations.

First, the two flows refer to structurally distinct populations and operate under different regulatory regimes. Therefore the two populations do not overlap and the two flows are additive. 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.

Second, the underlying populations differ markedly in size. The Action 3 population is substantially larger than the EU intra-professional mobility population from which the Action 2 flow draws. 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. 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 already corresponding to approximately 44 % of the long-term Action 2 flow across all regulated professions. The dedicated TCN survey (n=154) confirms this pattern, with 46.8% 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.

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 used here as the conservative lower floor.

- Thirdly, to **isolate the number of migration-related cases that require a qualification assessment for non-regulated professions**, it was assumed that all recognition applications for *regulated* professions fall within the broader pool of first-time residence permit applications for employment. By deducting these 62,500 regulated profession applications from the overall total of 125,000 first-time permits, we arrive at an estimated 62,500 cases linked to non-regulated professions. This baseline represents a conservative estimate as, in reality, a portion of recognition requests for regulated professions occur independently of first-time residence applications¹⁸⁵, meaning the actual number of non-regulated cases is likely higher.

A distinct question is how many additional 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 clearly points to latent demand of this kind which the study supporting this IA estimated at an additional 30,000 to 35,000 procedures per year.¹⁸⁶ For the purpose of this impact assessment, however, no increase in the total number of TCN applications is assumed. All estimates therefore rely on a deliberately conservative assumption with respect to the total volume of TCN recognition procedures. This is consistent with the logic of the initiative which does not interfere with the competence of Member States to decide how many, and which kind of, TCNs they wish to admit.

12. BASELINE – PER PROCEDURE COSTS

12.1. Direct per procedure costs in the context of regulated professions

The **per-procedure cost incurred by TCNs applying for a regulated profession** 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.¹⁸⁷ 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 % (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 9 , 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. Of 151 respondents, 15.9 % (24 of 151) reported zero procedural costs; the remaining 84.1 % (127 of 151) reported positive costs. The 15.9 % share is the extensive margin (24 respondents in the zero-cost regime), and the 84.1 %

¹⁸⁵ E.g. TCNs already residing legally in a MS and requesting recognition to access a regulated profession or TCNs arriving in the context of a different legal migration pathway (family reunification, asylum).

¹⁸⁶ The survey of competent authorities (Q29, n=181 valid responses) records that 56.9 % of competent authorities expect the challenges associated with TCN qualification recognition to grow over the next 5–10 years. Furthermore, the macro drivers (EU working-age decline of approximately 27 million projected over three decades, 85 % of EU occupations affected by labour shortages in 2023) point to structural pressure for growth. The behavioural withdrawal rate of 10.5 % recorded in the dedicated TCN survey (16 of 152 respondents who reported an outcome) provides an additional indication of the level of deterrence under the baseline.

¹⁸⁷ Higher cost levels are typically observed among complex sectoral dossiers (healthcare and legal professions) due to extensive translation, notarisation and compensation measures (Directive 2005/36/EC, Title III, Chapter III).

(127 positive-cost responses) form the basis for the intensive margin (cost level conditional on a positive cost being incurred). 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).¹⁸⁸

The component-level breakdown table (A4.1) covers six categories relevant in the recognition procedure and captured in question 18. The 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 professions¹⁸⁹) 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 the study supporting this impact assessment, 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 A4.1 - 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

¹⁸⁸ The pooled (weighted) mean over the full sample (including zero costs) is approximately EUR 1,285.

¹⁸⁹ 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
Postal / courier / additional documentation	30	40	n/a*	TCN survey Q18
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, notarisisation 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; the other components are derived from TCN-reported total costs (Q18) and supplemented by national mappings and focus group dataforms. 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. However, the SME Panel Survey 2026 provides a useful, order of magnitude consistency check, reporting the following costs: 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 warrant specific methodological comment: the application fee at the host competent authority (CA survey Q17) and the fee at ENIC-NARIC (NARIC survey Q12). Their distributions capture the coexistence of two distinct procedural regimes across the EU-26: 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 (CA survey), the 108 free-text responses were processed through a structured cleaning procedure¹⁹⁰. The resulting cleaned distribution comprises 94 valid numerical observations of which:

- 5 (5.3%) report a fee-waived regime including responses such as “procedure gratuite” (France), “no application fees” (Malta CPCM), “compliant with legal regulations” (Poland) and “não aplicável” (Portugal). The resulting cleaned distribution comprises 94 valid

¹⁹⁰ The cleaning procedure was carried so that the 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.

numerical observations, of which 5 (5.3 %) report a fee-waived regime and 89 (94.7 %) report a positive application fee.

- 89 (94.7%) report a positive application fee, with values ranging from EUR 12 (Malta) to EUR 1,971 (Netherlands).

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 % of competent authorities operate under a fee-waived regime. 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:

- extensive margin (the share of competent authorities operating under each regime) with five fee-waived and 89 fee-charging competent authorities. They are reported separately as a policy-relevant feature of the recognition landscape rather than as a cluster of zero-valued observations within the fee distribution
- intensive margin (level of the fee conditional on a fee being charged). 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).

A similar two-part logic applies to the ENIC-NARIC fee distribution (Q12), where 27.8 % of centres operate under a fee-waived regime and the remaining 72.2 % 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** (for both CA and ENIC-NARIC procedures), 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 % of competent authorities (n=125 of 190) identified translation as a typical cost component¹⁹¹.

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 countries¹⁹² (The component is identified as a typical cost by 41.1 % of competent authorities (n=78 of 190) in question 17 of the CA survey, and is

¹⁹¹ 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.

¹⁹² Apostille is not available for documents issued in non-Convention countries, requiring full diplomatic legalisation at higher cost).

corroborated by the dedicated question 13 of the CA survey on documents typically requiring legalisation,, with the share rising to over 60 % for procedures involving documents from non-Convention countries.

The **variable per-procedure CA-side costs for procedures pertaining to regulated professions** 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 of 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).

For the cost-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 cost, summing the applicant-side direct cost (EUR 1,100) and the CA-side variable cost (EUR 400), 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.

This per-procedure cost 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, and 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 %, Route B 25 %, Route C 15 % and Route D 10 % 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 % 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 % of cases — CA survey Q17/Q28; language barriers — CA survey Q28, 53.7 %). 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.

Table A4.2 Baseline per-procedure cost components for recognition in the context of regulated professions

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

Component	Central (EUR)	Range (EUR)	Source
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	

12.2. Direct per procedure costs for migration procedures not related to regulated professions

Migration procedures involving a qualification assessment not related to regulate professions are less complex, burdensome and costly because, in this context, the assessment takes the form of a verification of diplomas or the application of a standardized point system rather than a comprehensive evaluation of the professional qualifications. A separate cost framework was elaborated for this second type of procedure based on the mapping of migration procedures in Annex 9.

This second set of procedures is heterogeneous: only two Member States require the full set of document types, a further group (6 MS) requires an intermediate subset, and in a substantial number of Member States (15) 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 for which the cost model was constructed 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.

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.

13. ADMINISTRATIVE COST SAVINGS

The administrative cost savings achievable under each policy option are estimated as percentage reductions in the baseline per-procedure costs of EUR 1,500 (central scenario, range EUR 630–EUR 2,450) for regulated professions and of EUR 300 for migration-related recognition procedure not pertaining to regulated professions. They are assessed applying a realisation factor reflecting expected implementation effectiveness.

The cost 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 % of respondents), incomplete or non-transparent documents (63.7 %), language barriers (53.7 %) and lack of information about awarding bodies in third countries (60.5 %) — 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 % 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 cost 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 the study supporting the IA.

For recognition procedures pertaining to regulated professions, the gross savings ranges adopted in the framework are estimated at 4–8% of the per-procedure baseline under Policy Option 1, 15–22 % under Policy Option 2 and 33–47% under Policy Option 3 for the sectoral professions which would benefit from automatic recognition. The difference between the three reflects 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 with the additional savings concentrated on the verification and translation components for the sectoral subgroup.

For migration-related recognition procedures pertaining to non-regulated professions, cost savings arise from the reduction of documents required and their standardisation. Lower cost savings estimates were used than for regulated professions, reflecting the fact that these checks concern non-regulated professions, which are less complex and offer narrower scope for streamlining. The gross savings ranges adopted are set at 3-5% under PO1 and at 10-15% under

PO2 and PO3. Since automatic recognition does not apply to these procedures, no additional effect arises under PO3, which carries the same rate as PO2; the two options therefore yield identical savings.

Realisation factors reflect the expected degree of implementation effectiveness under each policy option. Under Policy Option 1, a realisation factor of 60% is applied, reflecting the soft-law character of the measures and the empirical evidence on the partial uptake of voluntary EU instruments in the recognition area¹⁹³, in line with the Better Regulation methodology. Under Policy Option 2, a realisation factor of 75% is applied, 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% is applied to the subgroup which would qualify for automatic recognition. 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. These rates are informed calibration assumptions rather than empirically observed implementation coefficients.

Cumulative values for cost-savings are present values in 2026, using 3% discount rate. Annual benefits for PO1 start to accrue in 2028 and up to 2040. Annual benefits for PO2 and PO3 start to accrue in 2029.

The tables below summarise the various steps in the calculations as well as their findings:

Table A4.3: Administrative cost savings for recognition procedures in regulated professions

Recognition for regulated professions	PO1	PO2	PO3
Admin. cost/procedure (in EUR)	1,500	1,500	1,500
Administrative cost savings (in %)	4-8	15-22	15-22 (non-automatic) AND 33-47 (automatic)
Admin. savings per appl. (in EUR)	36-72 (≈54)	169-247 (≈ 208)	169-247 (non automatic; ≈208) AND 420-599 (automatic; ≈ 510)
Number of annual applications	62,500	62,500	37,500 (non-automatic) AND 25,000 (automatic)

¹⁹³ Cf., for example, the Report on the Implementation of the 2018 Council Recommendation on promoting automatic mutual recognition of higher education and upper secondary education and training qualifications and the outcomes of learning periods abroad. The report highlights the variable national legislative alignment where only 12 Member States have fully adapted their legal frameworks to encompass all EU countries, while the remaining states rely on limited regional agreements or maintain a decentralized decision-making model delegated to individual higher education institutions. Furthermore, the report highlights significant variance in the implementation of the Bologna transparency tools (with 11 Member States failing to fully deploy them), a lack of systematic data collection (as only 7 Member States centrally monitor recognition decisions), and highly uneven credit recognition rates for learning periods abroad.

Realisation factor (in %)	60	75	75 (non automatic) AND 85 (automatic)
Aggregate administrative savings (in m EUR/year)	≈ 3.4	≈ 13	≈ 20.5
Cumulative aggregate admin. savings from 2029 to 2040 in PV (in m EUR)	≈ 35	≈ 134	≈ 212

Table A4.4: Administrative cost savings for migration-related recognition procedures

Migration-related procedures	recognition	PO1	PO2	PO3
Per procedure admin. cost (in EUR)		300	300	300
Administrative cost savings (in %)		3-5	10-15	10-15
Admin. savings per appl. (in EUR)		8-13	25-38	25-38
Number of annual applications		62,500	62,500	62,500
Realisation factor (in %)		60	75	75
Aggregate administrative savings (in m EUR/year)		≈0.5	≈1.8	≈1.8
Cumulative aggregate admin. savings from 2029 to 2040 in NPV (in m EUR) ¹⁹⁴		≈5	≈19	≈19

13.1. Monetised time savings

The concept of monetised time savings captures the reduction in opportunity costs incurred by applicants when overall processing times of recognition procedures are shortened.

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% of respondents reported working below their qualification level during the recognition procedure (n=152, question 15, including the “not applicable” category), or 55.1% when the calculation is restricted to the n=136 respondents who had effectively undergone the procedure. A further 16.4% 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

¹⁹⁴ Cumulative values are present values in 2026, using a 3% discount rate. Annual benefits for PO1 start to accrue in 2028 and up to 2040. Annual benefits for PO2 and PO3 start to accrue in 2029.

procedure is therefore approximately 65%, consistent with the higher exposure of TCN applicants to procedural barriers compared to EU nationals.

For the purpose of estimating the monetised time savings, the parameter 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 14.2¹⁹⁵ months recorded by question 13 of the dedicated TCN survey pooled with the Public Consultation TCN sub-sample (n=182, excluding 15.4 % “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.¹⁹⁶

The time savings that can be expected under the different POs depend on the measures they include:

- PO 1 introduces no 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% of the actual baseline (≈ 1.4 months);
- PO 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;
- PO 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 monetised time savings 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% for the healthcare cluster (28.8% dedicated TCN survey + 2.8% Public Consultation “Health”), with additional sectoral concentration in education or teaching (6.0 %), legal profession (3.6%) and engineering or architecture (3.2 %). For the framework, the sectoral share is set at 40% of the TCN procedure flow (range 30–50%), reflecting the seven sectoral professions. The number of applications benefitting from automatic recognition is therefore 25,000. This is a steady state estimate assuming that, once a sufficiently large number of pre-approved training programmes are put in place, the current

¹⁹⁵ 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. It refers to

¹⁹⁶ This estimate reflects the full duration of the procedure “from start (gathering documents) to finish (final outcome)”. It explicitly includes the document-gathering phase and, where applicable, compensation measures. This is distinct from the tighter “complete application to first decision” perimeter referred to by CAs.

share of applications potentially eligible for automatic recognition is fully reached through that channel.

The monthly opportunity cost is approximated using occupational wage proxies from the Eurostat Structure of Earnings Survey 2022, EU-27 aggregate¹⁹⁷), 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. Based on these wage proxies, monthly opportunity costs are estimated at EUR 800/month for the share of applicants who work below their qualification level during the processing time and of EUR 4,300/month for those who do not work at all.¹⁹⁸

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% of respondents working below their qualification level during the procedure (Q15).

The monetised time savings associated with each policy option are estimated by combining the volume of procedures in each subgroup, the corresponding reduction in processing timelines, the monthly opportunity cost proxy, the share of applicants either not working or working below their qualification level during the procedure (49.3%, question 15), and a realisation factor reflecting the expected degree of effective implementation under each policy option (60% under Policy Option 1, 75% under Policy Option 2, 85% under Policy Option 3; 95% reported as an upper-bound sensitivity).

These estimates are indicative in nature and are presented as orders of magnitude. They provide a policy-relevant assessment of monetised time savings, 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. They are analytically distinct from the administrative cost savings and therefore reported separately.

The table below summarises the main steps in the calculations and the results arrived at:

Table A4.5 – Monetised time savings for applicants

	PO1	PO2	PO3
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¹⁹⁷ 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.

¹⁹⁸ These shares are estimated at 49.3% and 16.4% on the basis of from the responses Q15 of the TCN survey, n = 152). For the sake of this simulation, it is assumed that 75% of those already working prior to their qualification recognition will find a job at their qualification level. This share is adjusted to 50% for those not yet in employment prior to the qualification recognition.

Time gained per procedure (months)	1.4	9	9 for non-automatic AND 10.2 for automatic
Total number of applications	62,500	62,500	37,500 (non-automatic) AND 25,000 (automatic)
Realisation factor	60%	75%	75% for non automatic AND 85% for automatic
Monthly opportunity costs (EUR)	approx. 800 for 49.3% of applications approx. 4,300 for 16.4% of applications	approx. 800 for 49.3% of applications approx. 4,300 for 16.4% of applications	approx. 800 for 49.3% of applications approx. 4,300 for 16.4% of applications
Share of applicants taking up employment	75% for 49.3% of applications 50% for 16.4% of applications	75% for 49.3% of applications 50% for 16.4% of applications	75% for 49.3% of applications 50% for 16.4% of applications
Aggregate monetised time savings (in m EUR/year)	≈33.5	≈273.5	≈300
Cumulative aggregate time savings from 2029 to 2040 in PV (in m EUR) ¹⁹⁹	≈346	≈2824	≈3098

13.2. Cost savings for employers

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 and the indirect cost of the recruitment cycle prolongation due to the recognition processing time.

¹⁹⁹ Cumulative values are present values in 2026, using a 3% discount rate. Annual benefits for PO1 start to accrue in 2028 and up to 2040. Annual benefits for PO2 and PO3 start to accrue in 2029.

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% of respondents identifying procedural simplification and digital credentials as the main factors that would reduce the employer-borne burden. Position papers from BusinessEurope (2026) and SMEUnited (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 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 three cost components (verification of the recognition outcome, coordination with migration authorities, 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% 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%, 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% 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.

No realisation factors were applied to these results as the reduction factors (5–10%, 20–30%, 35–50%) were elicited directly as judgement-based estimates of the expected reduction, drawing on the SME Panel and the FG5 employer polls. The realised dimension is therefore already embedded in how the ranges were set. Unlike in the case of administrative and time savings, they were not derived as a theoretical maximum and subsequently discounted.

Table A4.6 – Employer-borne cost savings

	PO1	PO2	PO3
Employer-borne costs (in EUR)	800-1200 (≈1000)	800-1200 (≈1000)	800-1200 (≈1000)
Cost reduction factor (%)	5-10 (≈7.5)	20-30 (≈25)	20-30 (≈25) (non automatic) AND 35-50 (≈42.5) (automatic)
Number of procedures	62,500	62,500	37,500 (non automatic) AND 25,000 (automatic)
Aggregate reduction of employer-borne costs (in m EUR/year)	≈ 4.7	≈15,6	≈20

Cumulative aggregate reduction in employer-born costs from 2029 to 2040 in PV (in m EUR) ²⁰⁰	≈49	≈161	≈207
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14. SENSITIVITY ANALYSIS

Given the degree of uncertainty surrounding certain variables and the high level of heterogeneity of the underlying procedures, estimations of impact rely on various assumptions.

A series of sensitivity analyses was therefore carried out.

The sensitivity of the administrative cost savings estimates to the underlying assumptions was tested across two dimensions:

- To account for the fact the impact of the POs is also dependent on implementation at MS, the realisation factor is varied by plus or minus 10 percentage points around the central value of each policy option.
- As explained above, the volume baselines are conservative estimates in light of the evidence available.²⁰¹ Since this flow is nevertheless contingent on various factors, including geopolitical developments and national migration policies, the volume baselines for both types of recognition procedures 62,500 procedures per year were varied across 40,000–85,000 procedures per year.

The results can be summarised as follows.

- Adjusting the realisation factors downwards yields aggregate administrative savings for recognition procedures in regulated professions of EUR 2.8 million, EUR 11.3 and EUR 18.0 million for PO1, PO2 and PO3 respectively (compared to EUR 3.4 million, EUR 13.0 million and EUR 20.5 million in the central scenario).
- Adjusting the realisation factors upwards yields aggregate administrative savings for recognition procedures in regulated professions of EUR 3.9 million, EUR 14.7 and EUR 23.1 million for PO1, PO2 and PO3 respectively.
- Adjusting the volume of recognition procedures downwards yields aggregate administrative savings for recognition procedures in regulated professions of EUR 2.2 million, EUR 8.3 million and EUR 8.8 million respectively.
- Adjusting the volume of recognition procedures upwards yields aggregate administrative savings for recognition procedures in regulated professions of EUR 4.6 million, EUR 17.7 million and EUR 28 million for PO1, PO2 and PO3.
- If both sensitivity dimensions are simultaneously adjusted downwards, the results are as follows: EUR 1.8 million, EUR 7.2 million and EUR 11.5 million for PO1, PO2 and PO3.

²⁰⁰ Cumulative values are present values in 2026, using a 3% discount rate. Annual benefits for PO1 start to accrue in 2028 and up to 2040. Annual benefits for PO2 and PO3 start to accrue in 2029.

²⁰¹ The total flow of recognition procedures is estimated by rounding the latest observed flows downwards, the estimate of the share of procedures pertaining to regulated professions is prudently anchored in the available evidence and the share of migration-related procedures pertaining to unregulated professions has been estimated by deducting the full share of procedures pertaining to regulated professions from the total flow.

- If both sensitivity dimensions are simultaneously adjusted upwards, the results are as follows: EUR 5.3 million, EUR 20.0 million and EUR 31.4 million for PO1, PO2 and PO3.

While the exact savings fluctuate, across all tested scenarios, the ranking of the three policy options remains unchanged, with PO3 consistently delivering the highest administrative cost savings relative to the baseline.

The sensitivity of the monetised time saving estimates to the underlying assumptions is tested across three dimensions:

- To account for the fact that the estimated processing time of the recognition procedure is expressed as an average covering a broad range of different national realities (involving different professions and CAs), the estimated value is varied between the lower bound of 9 months and the higher bound of 18 months
- Similarly, as the estimated monthly opportunity costs cover various professions in different MS, it is varied by plus or minus 20% around the central values of EUR 800 and EUR 4,300.
- The share of TCNs recruited via automatic recognition depends on the number of global institutions willing and able to train according to the EU's minimum training requirements and to incur the costs of the applicable quality assurance process. The reported central scenario assumes a steady state whereby the current share of recognition procedures concerning the professions for which there are minimum training requirements defined (approximately 40%) is covered fully through automatic recognition. A separate sensitivity analysis was performed adjusting the share downwards to 10%.

The results of these analyses can be summarised as follows:

- If the current estimated processing time is adjusted downwards to 9 months instead of 14.2, the monetised time savings under PO1, PO2 and PO3 respectively would amount to approximately EUR 21.5 million/year, EUR 121.6 million/year and EUR 142.3 million/year (instead of EUR 33.5 million/year, EUR 273.5 million/year and EUR 300 million/year for POs 1, 2 and 3 respectively under the central scenario).
- If it is adjusted upwards to 18 months, the monetised time savings would amount to approximately EUR 43 million/year, EUR 395 million/year and EUR 425.8 million/year.
- If the opportunity cost proxies are reduced to EUR 640/month for those TCN that are working but overqualified and to EUR 3,440/month for those that remain unemployed during the recognition process (instead of EUR 800 and EUR 4,300 respectively in central scenario), the monetised time savings amount to EUR 26.8 million/year, EUR 218.8 million/year and EUR 240 million/year for PO1, PO2 and PO3 respectively.
- If they are revised upwards to EUR 960/month and EUR 5,160/month, the monetised time savings go up to EUR 40.2 million/year, EUR 328,3 million/year.
- The share of TCNs recruited through automatic recognition only impacts the monetised time savings estimates for PO3. If this share is revised downwards to 10%, the monetised time savings of this option amount to approximately EUR 277 million/year, significantly lower than the nearly EUR 300 million/year under the central scenario, but still marginally better than the EUR 273.5 million/year of PO2.

While the estimates vary depending on the assumptions introduced, across all tested scenarios, the ranking of the three policy options remains unchanged, with PO3 consistently delivering the highest monetised time savings relative to the baseline.

15. IMPLEMENTATION COSTS

Implementation costs differ by policy option.

Under **policy option 1**, the majority of costs is linked to the preparation of **guidance, exchange of best practices, peer learning, additional comparisons of TCQs frameworks with the EQF and analytical support**. These one-off implementation costs at EU-level are estimated at between EUR 1 and 3 million. This expenditure is mainly driven by external technical expertise to TCQs against the EQF, as well as by studies and peer-learning events to align national recognition processes. Centralizing this analytical work avoids the fragmentation and duplicative costs of 27 separate national mapping exercises, yielding significant economies of scale.^[1] Member States would voluntarily engage in mutual learning and capacity building activities. Considering that costs for this would be marginal, they were not quantified for the purpose of this IA.

Under **policy option 2**, there are two major cost categories:

- **Interoperability of national databases** on third country qualification and recognition, entailing both, EU-level costs as well as adaptation costs on Member State level; and
- **A European service to assess the authenticity of third country qualifications** provided as evidence in a recognition process. These costs are borne on EU-level.

Under **policy option 3**, all of the cost categories of policy option 2 also apply. In addition, it would come with costs for establishing and managing **public register of third-country learning programmes eligible for automatic recognition**. These costs are borne on EU level.

The following table provides an overview of implementation costs per policy option. PO1 would have the lowest implementation costs of EUR 1.0 – 3.0 million at EU level and minor costs at Member State level. PO 2 would cost EUR 27.3 – 47.9 million one-off and EUR 3.7 – 6.0 million yearly costs. PO 3 would be only slightly above that with EUR 28.7 – 50.7 million one-off and EUR 3.7 – 6.0 million yearly costs.

Table A4.7: Summary overview of implementation costs per policy option

Cost category	Baseline	PO1	PO2	PO3
Guidance, best practice, peer learning	-	1.0-3.0 MEUR (EU level, one off)	-	-
Interoperability of national databases on third country qualifications and recognition	-	-	3.50 - 6.50 MEUR (EU level, one-off) 0.35 - 0.65 MEUR (EU level, yearly) 20.80 – 36.40 MEUR (MS level, one-off) 2.08 – 3.64 MEUR (MS level, yearly)	3.50 - 6.50 MEUR (EU level, one-off) 0.35 - 0.65 MEUR (EU level, yearly) 20.80 – 36.40 MEUR (MS level, one-off) 2.08 – 3.64 MEUR (MS level, yearly)
EU Authentication service for third country qualifications	-	-	3.0 -5.0 MEUR (EU level, one-off) 1.3 – 1.7 MEUR (EU level, yearly)	3.0 -5.0 MEUR (EU level, one-off) 1.3 – 1.7 MEUR (EU level, yearly)
Public register of third country qualifications eligible for automatic recognition	-	-	-	1.40 - 2.80 MEUR (EU level, one-off) 0.19 - 0.48 MEUR (EU level, yearly)
TOTAL	None.	1.0-3.0 MEUR (EU level, one off)	6.5 - 11.5 MEUR (EU level, one-off)	7.9 - 14.3 MEUR (EU level, one-off)

			1.65 - 2.35 MEUR (EU level, yearly)	1.74 - 2.83 MEUR (EU level, yearly)
			20.80 – 36.40 MEUR (MS level, one-off)	20.80 – 36.40 MEUR (MS level, one-off)
			2.08 – 3.64 MEUR (MS level, yearly)	2.08 – 3.64 MEUR (MS level, yearly)

Making national databases that contain data on third country qualifications, prior assessments and recognition interoperable, drives implementation costs under Policy Options 2 and 3. These estimates are indicative and based on an initial assumption of the required work packages. For each of these work packages, costs have been estimated based on prior experience with similar projects. These were then aggregated to achieve at the overall cost estimate. For estimates of costs that Member States would bear, an average estimate has been established per country, and multiplied the number of countries (26) that would be required to implement the solutions. The estimates 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.

Table A4.8: Costs for the interoperability of national databases (policy measure A9)

No.	Work package	Description	Cost estimate
1	Semantic standards & common data model	Work in expert groups on taxonomy alignment, metadata model, multilingual mappings and technical specification; validation and stakeholder consultation.	1.5-2.5 MEUR (EU level, one-off)
2	EU interoperability architecture & shared platform	Design and implementation of a lightweight EU interoperability layer (gateway/broker, registry, API management, monitoring, security/trust mechanisms)	2.0-4.0 MEUR (EU level, one off)
3	Continuous operation & maintenance (EU)	Hosting, support, updates, monitoring, training, minor feature improvements	0.35-0.65 MEUR (EU level, yearly) (10% of initial development costs)
4	National systems adaptation & integration	Mapping to common standards; API and connector implementation; testing; on-boarding ^[2]	0.8-1.4 MEUR (MS level, one-off)
5	Continuous operation & maintenance (MS)	Support, updates, monitoring, training, minor feature improvements	0.08-0.14 MEUR (MS level, yearly) (10% of initial development costs)
	TOTAL:	3.50 - 6.50 MEUR one-off costs at EU level 0.35 - 0.65 MEUR yearly costs at EU level 20.80 – 36.40 MEUR one-off costs for 26 Member States 2.08 – 3.64 MEUR yearly costs for 26 Member States	

Another major cost item in policy options 2 and 3 is the setting up and operation of an **EU-level service to assess the authenticity of evidence of formal qualifications issued in third countries** for the competent authorities of Member States. Such an EU service would centralise the expertise in fraud detection and cooperation with third countries, and thus help to streamline verification of qualifications. Cost estimates have been made on the assumption that Member

States would upload the qualification documents through a secure EU portal. A risk-based authentication workflow would process the majority of documents in a fully automated workflow, while only the smaller portion would require manual cross-checking or forensic analysis. The service would be supported by various tools, including AI-enabled solutions to detect fraud (also part of policy option 1 in policy measure B8; development of these solutions is considered in the cost estimates of action 2 of the Skills Portability Initiative). A permanent team would be entrusted to deepen cooperation with third countries that can facilitate authenticity checks, and to perform manual analysis where needed.

Table A4.9: Costs for EU-level assessment of authenticity of third country qualifications (policy measure A8)

No.	Work package	Description	Cost estimate
1	Exchange mechanism	Secure portal to submit evidence for verification and the authentication report with the assessment	1.5-2.5 MEUR (EU level, one-off)
2	Digital verification toolbox	Suite of IT tools to verify digital signatures/credentials, to obtain information of third countries, Member States or accreditation agencies; AI solutions for fraud detection (to be used from action 2 of the Skills Portability Initiative); Automated checks against blacklists	1.5-2.5 MEUR (EU level, one-off)
3	Continuous operation & maintenance	Hosting, support, updates, monitoring, training, minor feature improvements	0.6-1.0 MEUR (EU level, yearly) (20% of initial development costs)
4	Coordination and institutional liaison	Staff to coordinate the process, and build relations with third countries to enable automated checks and administrative cooperation	0.29 MEUR (EU level, yearly) (2.5 FTE * 116,000 EUR per person year ^[3])
5	Manual reviews	Staff to perform manual checks, take direct contact with awarding bodies, or perform forensic checks for cases that require manual review	0.41 MEUR (EU level, yearly) (3.5 FTE * 116,000 EUR per person year)
	TOTAL:	3.0 -5.0 MEUR one-off costs at EU level 1.3 – 1.7 MEUR yearly costs at EU level	

Under policy option 3 additional costs would be incurred on EU level for the **development and operation of a public registry**, that provides the necessary transparency as to which third country qualifications are eligible for automatic recognition. The issuance of **digital credentials** is not expected to come with additional costs at EU or Member State level, as these would not be implemented through the EU infrastructure for digital credentials (which cannot be used by third countries), but would be a mere requirement on third country education and training institutions.

Table A4.10: Costs for a Public Registry (policy measure A13)

No.	Work package	Description	Cost estimate
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1	Data model & publication standard	Definition of the data schema for publication; alignment with taxonomies; preparing a machine-readable publication format	0.4-0.8 MEUR (one-off)
2	Registry platform development	Development of a lightweight public registry, including search, submission workflow, API and export functionality, and interoperability-ready publication	1.0-2.0 MEUR (one-off)
3	Continuous operation & maintenance	Hosting, support, updates, monitoring, minor feature improvements	0.14-0.28 MEUR per year (10% of initial development costs)
4	Data management	Ingestion of qualifications, data validation, quality assurance, editorial work	0.05-0.20 MEUR per year
	TOTAL:	1.40 - 2.80 MEUR one-off costs at EU level 0.19 - 0.48 MEUR yearly costs at EU level	

For the cost calculation over the entire period, it is assumed that one-off implementation costs would be incurred equally split over two years (2027 and 2028), while yearly costs would be incurred as of 2029 for the rest of the period (until 2040).

Table A4.11 Total Implementation Costs (one-off and recurrent, 26 MS)

	Baseline	PO1	PO2	PO3
Total costs 2027-2040	0.0 M€	1.0 - 3.0 M€	72.1 – 119.8 M€	75.7 – 128.3 M€
... out of which borne by EU	0.0 M€	1.0 – 3.0 M€	26.3 – 45.8 M€	30.0 – 48.2 M€
... out of which borne by Member States	0.0 M€	0.0 M€	45.8 – 80.1 M€	45.8 – 80.1 M€
Total costs 2027-2040 (discounted to 2026 NPV)	0.0 M€	1.0 – 2.9 M€	61.1 – 102.0 M€	64.2 – 109.2 M€
... out of which borne by EU	0.0 M€	1.0 – 2.9 M€	21.7 – 33.1 M€	24.8 – 40.2 M€
... out of which borne by Member States	0.0 M€	0.0 M€	39.4 – 69.0 M€	39.4 – 69.0 M€

Note: Cumulative values are present values in 2026, using 3% discount rate. One-off EU and MS implementation costs are equally spread between 2027 and 2028. Recurrent EU and MS costs start in 2029 and up to 2040.

[1] The proposed cost estimate of EUR 1 to 3 million mirrors established EU financial benchmarks for soft-law coordination and structured policy roll-outs (e.g. targeted central interventions under the Erasmus+ budget operate within this financial range for 12- to 24-month cycles).

[2] The exact scope of implementation work will depend on the national digital ecosystem, e.g. which processes are supported by IT systems, and what information is managed in databases on national level.

[3] 66 EUR per hour x 8 hours per working day x 220 person-days per year. Hourly rate based on: hourly earnings 2022 + NWLC + 25% Overhead for ISCO-level 2 professionals in Belgium. Data Sources: Eurostat Structure of earnings survey, Labour Force Survey data for Non-Wage Labour Costs.

ANNEX 5: COMPETITIVENESS CHECK

This annex presents an overview of the competitiveness implications of the preferred policy option (Policy option 3: Common rules including automatic recognition for selected professions).

The table below summarises the expected impacts across the main dimensions of EU 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.

Table A5.1 — Overview of competitiveness impacts (preferred option: Policy Option 3)

Dimension of competitiveness	Impact	Reference to sub-sections of the main report or annexes
Cost and price competitiveness	++	Section 6.1 Direct costs impacts (cost and cost-savings and in particular section 6.1.3 employer-borne administrative costs) and Annex 4.3 and Annex 4.4.
International competitiveness	++	Section 6.2. Wider economic benefits.
Capacity to innovate	+	Section 6.2 Wider economic benefits.
SME competitiveness	++	Annex 6 (SME check), Section 6.1.3 (cost-savings for employers and section 6.2 Wider economic benefits.

1. Synthetic assessment

Among the three policy options assessed, Preferred option 3 generates the most significant positive contribution to EU competitiveness in the third-country dimension of qualification recognition.

Cost and price competitiveness

For employers in regulated sectors relying on cross-border recruitment of TCN, the preferred option 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. EU employers 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 and the indirect cost of the recruitment cycle prolongation due to the recognition processing time. These costs are estimated at approximately EUR 800–1,200 per recruitment of a TCN professional applying for a regulated profession. The reductions of costs under the preferred option reaches approximately 35–50% for recruitments involving the seven sectoral professions, driven by the automatic recognition channel and the digital credentials infrastructure which enable near-immediate verification by the employer and up to 30% for non-automatic professions. The reduction is also driven by shorter recognition

processing times, which reduce the employer's loss of productive capacity during the prolonged recruitment cycle, together with the documentation and coordination improvements specific to each option. International competitiveness

Policy Option 3 addresses two structural deterrents to skilled migration to the EU — the unpredictability of recognition outcomes and the duration of procedures — that the available evidence consistently identifies as material constraints on the EU's ability to compete with other major destination economies for global talent. The EMN-OECD Inform 2025 and the OECD Indicators of Immigrant Integration document that TCN currently favour the United States, Canada, Australia and New Zealand over EU MS, with Sweden the only Member State among the top five preferred destinations for highly skilled workers. The introduction of the automatic recognition framework (A12), supported by the public register of approved third-country learning programmes (A11) and verifiable digital credentials (A13), establishes a level of ex-ante predictability for qualifying applicants that no Member State framework currently achieves in isolation. The Draghi Report (2024) identifies barriers to skilled-labour mobility as a structural weakness of EU competitiveness; this action addresses that weakness directly in the third-country dimension. The monetised time savings from reduced waiting time — in the order of magnitude of **EUR 300 million per year** for applicants and of order of **EUR 20 million per year for employers** - — capture the productive value released by faster procedures.

Capacity to innovate

The effects of Policy Option 3 on innovation capacity are indirect but consistent in direction. Faster and more predictable recognition releases the productive capacity of qualified TCN into qualification-matched employment, materially reducing the brain-waste phenomenon documented in the EMN-OECD 2025 study and the OECD Indicators of Immigrant Integration. In 2023, 39.4% of employed TCN in the EU were overqualified compared with 20.8% of nationals — a 19-percentage-point gap reflecting the structural underutilisation of TCN human capital. Measures such as use of verifiable digital credentials and interoperable national databases, and EU-level authenticity check service also strengthen the digital infrastructure of public administrations. Policy Options 1 and 2 generate smaller positive effects in this dimension, in proportion to their lower procedural impact and more limited reach.

SME competitiveness

Policy Option 3 addresses the asymmetric burden that recognition procedures currently place on smaller firms recruiting TCN. The SME Panel Survey (2026, n=159) documents a sharp gradient in employer-borne costs by qualification origin: approximately **EUR 2,875** for TCQ (median EUR 750), compared with EUR 814 for non-national EU qualifications and EUR 657 for national qualifications, with corresponding differentials in process duration (91 days vs. 37 days vs. 21 days respectively). BusinessEurope (2026) and SMEUnited (2026) confirm that bureaucratic complexity, documentary requirements and limited digital processes are the primary obstacles for smaller firms. The mandatory procedural rules carried over from Policy Option 2 — deadlines, documentary limits, fee transparency, right of appeal — eliminate the elements of unpredictability most costly relative to firm size. The automatic recognition route concentrates the strongest effect on healthcare and other sectoral professions, while the common procedural rules generate broader benefits for SMEs in construction, engineering and other shortage occupations. The SME Panel Survey documents anticipated mean savings of 26–36% per cost category, with the largest savings on internal administrative time (36%), translation and certification (35%) and recruitment-related costs (34%). SME-specific realisation of the aggregate employer-borne saving is expected at or above the system average, given the asymmetric baseline burden documented in the survey evidence.

2. Competitive position of the most affected sectors

The following sectors are most significantly exposed to recognition barriers in the third-country dimension: healthcare and social services, construction and craft trades, engineering and technical services, and information and communication technology (ICT). The selection reflects convergent evidence from the European Labour Authority (2024), the OECD Indicators of Immigrant Integration, the EMN-OECD 2025 study on labour-market integration of TCN, the SME Panel Survey (2026, n=159), and position papers from BusinessEurope (2026) and SMEUnited (2026). Table A5.2 presents their current competitive position and the expected impact of the preferred policy option.

Table A5.2 — Competitive position of the most affected sectors and expected impact of Policy Option 3

Current competitive position and key challenges	Expected impact of Policy Option 3
1. Healthcare and social services	
European Labour Authority (2024) documents shortages of specialist medical practitioners in 75% of EU countries, generalist practitioners in 64%, and nurses in 78%. 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 Directive 2005/36/EC harmonised minimum training requirements are the core healthcare occupations, but the recognition pathway for TCQ 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 OECD Indicators of Immigrant Integration.	Policy Option 3 introduces the most material change in this sector. The automatic recognition route for sectoral professions, based on prior verification of learning programmes against EU standards, materially compresses the procedure for healthcare qualifications meeting the verification standard. The combination of common procedural rules (A1–A10) and the EU-level authenticity check service (A8) addresses residual cases outside the automatic recognition perimeter. The procedure-time reduction — from approximately 14.2 months at baseline to approximately 4 months — directly alleviates vacancy durations in healthcare. The monetised time savings attributable to the healthcare component is the single largest contribution to the order of magnitude of EUR 300 million per year estimated at system level.
2. Construction and craft trades	
SMEUnited (2026) identifies construction and craft trades as among the sectors most affected by labour shortages across the EU, with shortages of electricians, plumbers, roofers and carpenters in Austria, Germany, Finland, Croatia and Spain. 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	Policy Option 3's mandatory procedural rules (A1–A10) and limitation on documentary requirements directly address the documentation complexity burdening craft-profession recognition. Mandatory fee discipline removes cost unpredictability for SMEs. Interoperable national databases on the comparability of TCQ reduce the information asymmetry structurally affecting craft-profession assessment. While the automatic recognition route does not cover

burdensome, with documentary requirements that vary widely across MS and frequent activation of compensation measures for third-country applicants.	craft professions in its initial perimeter, the common procedural rules apply uniformly, generating substantial improvements relative to the baseline.
3. Engineering and technical services	
BusinessEurope (2026) documents shortages of civil, mechanical, electrical and mechatronics engineers across multiple MS, particularly in Germany, Austria and Spain. Engineers are regulated in most MS, but the regulatory architecture differs widely. Recognition procedures for third-country engineering qualifications face particular difficulties in establishing equivalence of foreign engineering programmes with national curricula, with frequent activation of compensation measures. The SME Panel Survey (2026) confirms manufacturing and engineering as the most represented sector among respondent firms (23%, 36 of 159 respondent firms), with 40% reporting difficulties verifying the authenticity of foreign qualifications.	Policy Option 3's common procedural rules (A1–A10) introduce uniform standards for the assessment of third-country engineering qualifications, including documentary discipline, multilingual document acceptance and binding procedural guarantees. Interoperable national databases and the EU-level authenticity check service substantially reduce the information costs of substantive assessment. While engineering is not in the initial perimeter of the automatic recognition route, the common rules apply uniformly, generating material improvements in predictability and timeline.
4. ICT	
ICT occupations are largely unregulated, but specific roles — particularly those exposed to cybersecurity, critical-infrastructure or regulated-data considerations — face recognition requirements affecting the integration of qualified third-country professionals. The sector experiences structural shortages across the EU, documented by the European Labour Authority (2024) and confirmed by BusinessEurope (2026) for IT experts in industrial MS. The SME Panel Survey (2026) records ICT 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 minimum mandatory information requirements and harmonised EU-level information provision support employers' ability to assess third-country ICT qualifications more reliably. Verifiable digital credentials, although primarily designed for the automatic recognition route, have spillover benefits in unregulated ICT occupations through increased trust in standardised qualification documentation.

ANNEX 6: SME CHECK

OVERVIEW OF IMPACTS ON SMES

Relevance for SMEs

The action 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 ICT. They are affected both as employers whose cross-border recruitment decisions involving TCN are constrained by recognition and validation procedures, and as firms whose owner-operators or key staff hold TCQ requiring recognition for the exercise of regulated professions.

(1) IDENTIFICATION OF AFFECTED BUSINESSES AND ASSESSMENT OF RELEVANCE

Are SMEs directly affected? In which sectors?

SMEs are **directly affected** in two ways: as employers in sectors relying on the recognition system when recruiting TCN; and as professional service operators whose owner-operators hold TCQ requiring recognition for the exercise of a regulated profession.

The SME Panel Survey (2026, n=159) documents that more than half of respondents had cross-border hiring experience in the previous five years, with a substantial share involving TCQ: 21 per cent had hired from both other EU MS 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) and ICT, as well as manufacturing-adjacent regulated and partially regulated occupations.** The 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) and education (8 per cent), with additional representation from accommodation and food services, ICT and wholesale and retail (approximately 6 per cent each). These figures reflect the composition of the survey sample and are indicative of sector coverage rather than a direct measure of impact intensity²⁰².

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 TCN in the EU-27 in 2024 (Eurostat migr_resfirst). An indicative sub-set of approximately 50,000 per year corresponds to recruitments involving the recognition of third-country professional qualifications. A substantial part of these

²⁰² SME Panel Survey (2026, n=159); SMEunited (2026); BusinessEurope (2026); Eurostat migr_resfirst.

(1) IDENTIFICATION OF AFFECTED BUSINESSES AND ASSESSMENT OF RELEVANCE

recruitments is supported by SMEs operating in the sectors most exposed to recognition barriers. SMEunited (2026) emphasises that craft-sector regulation alone covers a large number of regulated professions across the EU, and that the regulatory framework for professional qualifications differs significantly between MS, compounding the administrative burden on smaller firms²⁰³.

Estimated number of employees in directly affected SMEs

A precise count of employees in directly affected SMEs is not available, given the absence of a consolidated dataset linking recognition procedures to employer-firm characteristics. Eurostat Structural Business Statistics (sbs_sc_ovw, 2023) record 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. In the healthcare sector, the European Labour Authority (2024) documents shortages of specialist medical practitioners in 75 per cent of EU MS, generalist practitioners in 64 per cent and nurses in 78 per cent, indicating that a substantial number of positions — many within SME-scale organisations such as private clinics and care homes — are directly affected by the current recognition framework²⁰⁴.

Are SMEs indirectly affected? (Yes/No) 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 impose disproportionate costs on smaller firms. The SME Panel Survey (2026) documents a mean process duration of approximately 91 days for the recognition of TCQ, substantially longer than for non-national EU qualifications (mean 37 days) and national qualifications (mean 21 days). The long 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, which can absorb delays through dedicated HR capacity and workforce planning resources. Sectors most indirectly affected are healthcare and social services, construction and craft trades, and engineering and technical services. An aggregate estimate of indirectly affected SMEs is not available from the primary data²⁰⁵.

²⁰³Annual Report on European SMEs 2024/2025 (European Commission/Joint Research Centre); Eurostat migr_resfirst; SMEunited (2026).

²⁰⁴Sources: Eurostat Structural Business Statistics (sbs_sc_ovw, 2023); European Labour Authority (2024).

²⁰⁵SME Panel Survey (2026, n=159); SMEunited (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) constitutes 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), across 18 EU and third countries. The position paper of BusinessEurope (2026) provides qualitative input from member federations on the industrial and manufacturing sectors and on the cross-cutting challenges of recognising TCQ. The position paper of SMEunited (2026) provides comprehensive input from the European association of crafts, trades and SMEs, with specific focus on the structural deficiencies that smaller firms face when integrating workers qualified abroad. The focus group with employers (FG5) and the PC employer and business sub-sample provided additional qualitative and quantitative evidence specific to the third-country dimension of qualification recognition. This input has been systematically integrated into the assessment of costs, benefits and mitigating measures in this Annex and in Section 7.2 of the report²⁰⁶.

Are SMEs' views different from those of large businesses? (Yes/No)

Yes.

Large businesses can absorb recognition costs through dedicated HR departments, internal legal capacity and established relationships with external advisers, whereas SMEs cannot. SMEunited (2026) emphasises that the structural constraints of SMEs are compounded when searching for qualified personnel across borders, and that complex bureaucratic procedures, the absence of digital processes and divergent national requirements create disproportionate obstacles for smaller firms. BusinessEurope (2026) identifies bureaucratic complexity, the lack of digital processes and language barriers as the primary challenges in cross-border recruitment, with particular relevance for TCN. SMEs are disproportionately reliant on external consultancy or legal support to navigate recognition procedures — a category for which the SME Panel Survey records a mean cost of approximately EUR 545 per procedure — or are compelled to forgo cross-border recruitment of TCN entirely. SMEs attach greater priority to binding procedural deadlines, free digital tools and standardised information; large businesses place additional emphasis on credential portability for senior mobile professionals and on the integration of recognition with internal mobility programmes²⁰⁷.

²⁰⁶ SME Panel Survey (2026, n=159); BusinessEurope (2026); SMEunited (2026); focus group with employers (FG5); PC (employer and business sub-sample, n=118).

²⁰⁷ SME Panel Survey (2026, n=159); BusinessEurope (2026); SMEunited (2026).

(3) ASSESSMENT OF IMPACTS ON SMEs²

What are the estimated direct costs for SMEs of the preferred policy option? (Fill in only if step 1 flags direct impacts)

Qualitative assessment

Recognition procedures for TCQ impose costs that fall disproportionately on SMEs. These include the opacity and unpredictability of fees, timelines and documentary requirements; fixed administrative burdens — certified translations, legalisation and authenticity verification — that are disproportionate to SME capacity; and dependence on external consultancy or legal support that larger firms internalise. BusinessEurope (2026) identifies procedural complexity, the absence of digital processes and language and cultural barriers as the primary obstacles. SMEunited (2026) highlights the high reallocation costs that smaller firms cannot readily absorb, and emphasises that streamlining recognition and reducing administrative barriers — while maintaining high qualification standards — would directly support SME workforce integration in shortage sectors. Policy Option 3 does not impose new direct compliance costs on SMEs; the figures below describe the baseline employer-side costs that the preferred option is designed to reduce.

Quantitative assessment

The SME Panel Survey (2026, n=159) provides the primary quantitative evidence on employer-borne recognition costs. The cost gradient by qualification origin is pronounced: for national qualifications, mean external cost per hire is approximately EUR 657 (median EUR 250); for non-national EU qualifications, approximately EUR 814 (median EUR 250); for TCQ, 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 TCQ. Mean man-hours invested by the hiring organisation are approximately 40 for national qualifications, 55 for non-national EU qualifications and 125 for TCQ. The principal cost components are: recruitment-related costs (mean EUR 1,619), bridging or training costs (mean EUR 526), external consultancy or legal support (mean EUR 545), recognition body fees (mean EUR 407) and internal administrative time (mean EUR 354). Applying these unit costs to the indicative volume of approximately 50,000 recognised third-country professional recruitments per year (derived in Section 7.2), the aggregate baseline employer-borne cost is in the order of magnitude of EUR 50–100 million per year²⁰⁸.

What are the estimated direct benefits/cost savings for SMEs of the preferred policy option³?

Qualitative assessment

Under Policy Option 3, SMEs benefit from binding procedural deadlines that eliminate the long-tail vacancy periods disproportionately disruptive to smaller firms; the automatic-recognition route for sectoral professions, which removes the need for case-by-case substantive assessments for

²⁰⁸ SME Panel Survey (2026, sections 9–10.1); Eurostat migr_resfirst; Section 7.2 (employer-borne administrative costs).

(3) ASSESSMENT OF IMPACTS ON SMEs²

qualifying applicants; mandatory fee disciplines that remove cost unpredictability; verifiable digital credentials that reduce the residual-risk premium SMEs currently bear.

Quantitative assessment

The SME Panel Survey (2026, section 10.1) documents anticipated mean cost savings from EU-level reform across all employer-borne cost categories, ranging from approximately 26 per cent (recognition body fees) to approximately 36 per cent (internal administrative time), with a mean of approximately 31 per cent. The full breakdown is set out in the table below. The cost categories recording the highest anticipated savings — internal administrative time, translation and certification, and recruitment-related costs — correspond directly to the components most reduced by PO3's binding procedural deadlines, harmonised documentary requirements and automatic recognition route for sectoral professions. The survey additionally documents that 68 per cent of respondents anticipated reduced administrative burden during recruitment, 63 per cent easier assessment of foreign qualifications, 61 per cent faster recruitment processes and 50 per cent lower verification costs as the principal benefits of reform.

Applying the survey-documented anticipated savings to the TCQ cost baseline established above, the expected per-recruitment saving for sectoral professions covered by automatic recognition is in the order of approximately 35–50 per cent of the EUR 2,875 TCQ mean, yielding an indicative saving of approximately EUR 1,000–1,440 per recruitment in the sectoral subgroup. The SME-specific component of the system-level aggregate saving is not separately quantified in the survey; however, SME realisation is expected to be at or above the system average given the asymmetric baseline burden documented in the costs section above.

Cost category	Anticipated saving
Internal administrative time	36%
Translation and certification	35%
Recruitment-related costs	34%
Risk-related costs from partial or denied recognition	32%
Compliance costs	31%
External consultancy or legal support	30%
Recognition body fees	26%
Mean across all categories	~31%

In terms of perceived benefits, 68 per cent of survey respondents cited reduced administrative burden during recruitment, 63 per cent easier assessment of foreign qualifications, 61 per cent faster

(3) ASSESSMENT OF IMPACTS ON SMEs²

recruitment processes and 50 per cent lower costs related to verifying qualifications. With reference specifically to the third-country dimension, the survey estimates a per-recruitment cost reduction of approximately 35–50 per cent for sectoral professions covered by the automatic-recognition route under Policy Option 3, 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. The SME-specific component of this aggregate is not separately quantified; however, SME realisation is expected to be at or above the system average, given the asymmetric administrative burden that recognition procedures currently place on smaller firms relative to those with dedicated HR capacity. This is an analytical inference based on the cost gradient documented in the SME Panel Survey rather than an empirically observed implementation coefficient²⁰⁹.

What are the indirect impacts of this initiative on SMEs?

Three categories of indirect impact are identified.

First, **reduced vacancy duration**. Binding procedural deadlines (measure A4) and the automatic-recognition route for sectoral professions (measure A11) eliminate the long-tail third-country recognition cases that generate disproportionate disruption for SMEs with tight workforce-planning constraints. The SME Panel Survey records a mean process duration of approximately 91 days for TCQ, compared with approximately 21 days for national qualifications.

Second, **improved cross-border deployment capacity**. Faster and more predictable recognition reduces the financial and operational risk of deploying staff in other MS, strengthening the ability of SMEs to bid competitively for cross-border contracts in regulated sectors.

Third, **reduced information asymmetry**. Harmonised information requirements (A3), the public EU register of approved third-country learning programmes (B15) and use of digital credentials for the sectoral sub-group (A12) collectively reduce SME reliance on external consultancy and legal support — a cost category for which the SME Panel Survey records a mean of approximately EUR 545 per procedure²¹⁰.

(4) MINIMISING NEGATIVE IMPACTS ON SMEs

Are SMEs disproportionately affected compared to large companies? (Yes/No)

If yes, are there any specific subgroups of SMEs more exposed than others?

Currently, recognition barriers affect SMEs asymmetrically because smaller firms lack the dedicated HR capacity, internal legal expertise and established external networks available

²⁰⁹ SME Panel Survey (2026, sections 10–10.1); Section 7.2 (employer-borne administrative costs).

²¹⁰ SME Panel Survey (2026, sections 9.1–10.1); BusinessEurope (2026); SMEUnited (2026); Section 7.2.

(4) MINIMISING NEGATIVE IMPACTS ON SMEs

to larger employers. SMEUnited (2026) emphasises that these structural constraints are compounded in cross-border recruitment involving TCQ; BusinessEurope (2026) identifies procedural complexity and the absence of digital processes as the primary obstacles, with disproportionate impact on smaller firms.

Policy Option 3 is designed to correct this asymmetry. The automatic-recognition route for sectoral professions and standardised procedural and information 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.

Have mitigating measures been included in the preferred option/proposal? (Yes/No)

The recognition framework under Policy Option 3 is structured to avoid placing new compliance obligations on SMEs, so no mitigation measures are needed. SMEs are recipients of the simplification benefits of the action (reduced employer-borne administrative cost, faster procedures, more predictable timelines and improved information transparency) rather being subject to any new compliance obligations. No new direct administrative obligation falls on SMEs as a result of the action.

Lighter regimes, exemptions or longer transitional periods specific to SMEs are not required. SMEs are net beneficiaries of the reform rather than subjects of new regulatory obligations, no SME-specific derogation is necessary or appropriate. The preferred option is designed to deliver SME benefits without imposing SME compliance obligations. The measures most directly supporting full SME realisation of those benefits are:

- **A3** — standardised, accessible and timely information on recognition procedures available at national level, reducing SME dependence on external advisers;
- **A11** — a public EU register of approved third-country learning programmes, providing ex-ante predictability for employers;
- **A12** — verifiable digital credentials for the sectoral sub-group, eliminating the need for ad-hoc authentication arrangements that smaller firms find disproportionately costly;
- **A8** — an EU-level service for authenticity checks, reducing SME reliance on direct interaction with third-country issuing institutions;
- **A4** — binding procedural deadlines, eliminating the open-ended vacancy periods most damaging to SMEs operating under tight workforce-planning constraints.

CONTRIBUTION TO THE 35% BURDEN REDUCTION TARGET FOR SMEs

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

CONTRIBUTION TO THE 35% BURDEN REDUCTION TARGET FOR SMEs

Yes.

On the recognition-procedure dimension, the system-level burden reduction under Policy Option 3 is in the order of 33–47 per cent of the per-procedure baseline, with a central estimate of approximately 40 per cent, as documented in Section 7.2 and Annex 4.5. This central estimate exceeds the 35 per cent reference point used for SME-relevant burden reduction. On the complementary employer-borne administrative cost dimension, SME-specific anticipated savings documented in the SME Panel Survey (2026, section 10.1) range from approximately 26 per cent (recognition body fees) to approximately 36 per cent (internal administrative time), with a mean of approximately 31 per cent across all cost categories. The cost components recording 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) — correspond precisely to the categories where the asymmetric SME burden is most pronounced. SME-specific realisation is expected to be at or above the system average.

ANNEX 7: DISCARDED OPTIONS

The following policy options were not retained for further in-depth assessment:

(1) Developing an EU-wide digital platform for recognition and validation processes

Two routes towards a dedicated EU-level digital solution were examined and discarded, namely the creation of a new EU-wide digital platform for recognition and validation procedures, and the extension to TCN of the fully unified digital workflow envisaged under Action 2 of the SPI. Both were discarded for the same underlying reason, in that digitalisation alone, without prior convergence or simplification of the underlying procedures, would not address the drivers of the problem and would entail a disproportionate implementation effort.

The first route envisaged the creation of a dedicated EU-level digital platform to serve as a central interface for recognition of qualifications and validation of skills procedures, integrating workflows, information and cooperation tools across MS. While such a platform could in principle improve user experience and facilitate information exchange, it was discarded as it would not effectively address the underlying drivers of the problem.

Such a platform would primarily digitalise existing processes without simplifying or rationalising them. Without prior convergence or simplification of procedures, a common platform would need to accommodate multiple parallel pathways, thereby maintaining or even entrenching complexity for users and limiting efficiency gains for employers and authorities. Further, while such a digital platform could improve access to information on recognition and validation procedures, the platform would not in itself reduce administrative burden at source or strengthen trust in TCQ. It was also considered that an EU-wide digital platform could complement or enable implementation of the options described above, however, given the diversity of recognition procedures across different national contexts, which are often embedded within administrative systems, and migration pathways, accommodating these within a single portal would represent a disproportionate implementation effort.

The second route considered whether the fully unified EU recognition workflow envisaged under Action 2 of the SPI could be extended to this action. Action 2 builds on a highly harmonised acquis and on aligned national administrative processes, whereas the recognition of qualifications of TCN is embedded in heterogeneous national systems that differ considerably as regards the legal effects of recognition, the authorities involved, the procedural steps and the integration with migration timelines. A single EU workflow would require substantial alignment of national procedural rules and back-office organisation in an area closely intertwined with national migration policy, going beyond what is necessary to achieve the objectives of the action and raising major feasibility, proportionality and subsidiarity concerns. Nor does the digital infrastructure underpinning Action 2 provide a ready-made solution, since IMI and the SDG and OOTS framework were developed for trusted exchange among authorities operating within the EU legal framework and do not enable participation by third-country authorities, qualification issuers or verification bodies, while the EUDI wallet does not of itself resolve questions of issuer trust, authenticity or the legal recognition of third-country qualifications.

A dedicated EU-level digital solution was therefore discarded in both variants, not because digital convergence is undesirable but because a modular approach is more feasible and proportionate. Important synergies with Action 2 are nevertheless retained under all options, in particular the reuse of digital building blocks such as common interfaces for the submission of

applications, standardised data fields and data models, and optional AI-enabled tools supporting document verification and the assessment of substantial differences. These synergies are taken up in the assessment of coherence in Section 7.3.

(2) Extension of Directive 2005/36/EC (the PQD) on the recognition of professional qualifications to cover third-country nationals

While considering the possibility of extending existing relevant legislation on the same topic is a logical starting point, in fact extending Directive 2005/36/EC (the PQD) on the recognition of professional qualifications to cover TCN is not legally feasible due to its legal basis, material and personal scope. The Directive is founded on internal market provisions of the Treaty, in particular those related to the free movement of persons and services, and is designed to facilitate mobility of EU citizens within the Union. Its provisions are therefore intrinsically linked to rights deriving from EU citizenship. Moreover, its material scope is limited to recognition of professional qualifications for the purpose of accessing or pursuing a regulated profession. By contrast, the envisaged action focuses on TCN and targets a broader concept of recognition, i.e. not only recognition of professional qualifications to access a regulated profession but also any recognition (or assessment) of qualifications that is part of a legal migration procedure. Such policy measures require a different legal basis, namely Article 79 TFEU, which governs conditions of entry, residence and rights of TCN. Extending the Directive to TCN and to recognition in the context of legal migration procedures would therefore go beyond its legal bases, requiring a different legal framework grounded in migration competences rather than internal market freedom.

(3) Common procedural rules for validation of skills

This option considered the potential of establishing procedural rules for the validation of skills of TCN, following the logic of the simplifying rules envisaged under Option 2 (establishing requirements applied to application processes for recognition of qualifications, such as fees, deadlines, and right of appeal).

The option was firstly discarded because any EU intervention establishing procedural rules specifically for TCN 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 TCN would therefore raise equal treatment concerns and could not be justified as a proportionate use of EU competence.

A second basis for discarding the option is that validation does not lend itself to the same kind of procedural rules. While recognition follows a comparable logic across MS 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 validation²¹¹ are designed to capture individual skills and experiences in a tailored way and is 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

²¹¹ The 2012 Recommendation identifies four distinct phases: Identification of an individual's learning outcomes acquired through non-formal and informal learning; Documentation of an individual's learning outcomes acquired through non-formal and informal learning; Assessment of an individual's learning outcomes acquired through non-formal and informal learning; Certification of the results of the assessment of an individual's learning outcomes acquired through non-formal and informal learning in the form of a qualification, or credits leading to a qualification, or in another form, as appropriate.

validation, applying a structured logic onto processes that are often deliberately informal and adaptable.

ANNEX 8: LEGAL AND POLICY CONTEXT

The primary focus of this action are TCN who seek employment in the EU and require recognition of their qualifications.

While there are EU legal migration instruments targeted at specific categories of TCN that establish rules for entry and residence, improve matching between employers and potential recruits, define the rights of legally resident TCNs and provide for equal treatment with nationals in certain areas — including in relation to qualifications — their impact on recognition of qualifications and validation of skills of TCN is limited at most. None of these instruments addresses the organisation, design or functioning of recognition of qualifications and validation of skills systems. They neither create obligations on MS to simplify or coordinate recognition procedures, leaving national divergence of procedures fully intact, nor do they contribute to resolving the structural misalignment between migration systems and recognition frameworks. Moreover, their coverage is limited to the specific categories of TCN falling inside their scope.

The EU single market instrument that does lay down a binding legal framework for recognition of qualifications, i.e. the PQD, is – due to its single market legal basis - necessarily limited in scope to EU nationals. Furthermore, since migration procedures do not apply to EU citizens, its scope is confined to recognition for access to a regulated profession and it does not address the structural misalignment between migration systems and recognition frameworks.

The only EU level instrument directly and comprehensively targeting recognition of qualifications of TCN is the non-binding Commission Recommendation (EU) 2023/2611.

Other EU instruments like Mutual Recognition Agreements (MRAs) and transparency tools (e.g. EQF) have only piecemeal impacts or do not affect the divergence and complexity of national recognition procedures. International law instruments like the Lisbon Recognition Convention and related ENIC-NARIC network, as well as the UNESCO Global Recognition Convention are limited in scope to higher education qualifications and lack enforceability.

16. TREATY LEGAL BASIS

The Treaty on the Functioning of the European Union establishes two distinct legal frameworks that impact on the recognition of qualifications of TCN in the EU.

The **Single Market framework** governs the free movement of persons, workers and the self-employed within the Union. The relevant Treaty articles are Articles 45–48 TFEU (free movement of workers), Articles 49–55 TFEU (freedom of establishment) and Articles 56–62 TFEU (freedom to provide services). Secondary legislation adopted on these bases, notably Directive 2005/36/EC on the recognition of professional qualifications **is built around EU citizenship and the exercise of free movement rights**. The PQD's personal scope is defined accordingly: **it applies to EU nationals who wish to practise a regulated profession in a Member State other than the one where they obtained their qualification**. The Single Market legal bases empower the EU to regulate conditions of professional mobility *between* MS for persons who are already citizens of those MS. They do not extend to the conditions under which TCN are admitted, nor to the definition of their rights once admitted.

The **migration framework** is set out in Title V of the TFEU (Area of Freedom, Security and Justice). Article 79(2) TFEU specifically empowers the European Parliament and the Council to adopt measures on the conditions of entry and residence of TCN, and on the definition of their rights in MS, including conditions governing freedom of movement and of residence

within the Union. Article 79(2)(a) covers conditions of entry and residence, and Article 79(2)(b) covers the definition of the rights of TCN legally residing in a Member State, including the conditions governing freedom of movement and of residence in other MS. These **are people-centred provisions** as they are concerned with who may come, on what terms, and what rights they hold once present. Secondary legislation built on Article 79(2) TFEU (see ‘Legal Migration’ below) is structured accordingly, **organised around the conditions of entry and residence of the applicant and his/her rights** rather than around a substantive policy domain such as qualification recognition.

The three scenarios and their legal framework

The scenario that lies at the core of the current action and impact assessment is that **of a TCN who holds qualifications obtained in a third country** and seeks recognition in an EU Member State. As explained above, this situation is covered by the migration framework and more specifically Article 79(2) TFEU that allows for measures to be taken on conditions of entry and residence of TCN, and on the definition of their rights in MS.

A legally complete analysis must however consider two further scenarios.

The first concerns **TCN who hold qualifications obtained in another Member State**. A TCN who was trained in France (while legally residing there) and now seeks to practise a regulated profession in Germany is a TCN covered by Article 79 TFEU (migration framework). Although an EU qualification is involved, the personal scope of the Single Market legal bases means that this scenario falls outside the scope of the Professional Qualifications Directive (PQD) framework. There is however a narrow exception to this: where such a TCN falls within the personal scope of an EU migration directive — for example, the Blue Card Directive or the Long-Term Residents Directive — they are entitled to equal treatment with Member State nationals with regard to recognition of qualifications obtained in the EU, which in principle means they can access PQD recognition procedures. However, this coverage is indirect and applies only to the defined (limited) categories covered by those directives and – if recognition is sought in a second MS - enjoying intra-EU mobility rights. There is no horizontal EU framework ensuring that all TCN with EU qualifications can access structured recognition procedures on equal terms with EU citizens.

The second concerns **EU nationals who hold qualifications obtained in a third country**. A French citizen who studied medicine in the United States and wishes to practise in Italy is an EU citizen exercising free movement rights. Their situation is governed by EU citizenship and the Single Market framework, not by Article 79 TFEU. The PQD applies to them as an EU national but only in relation to qualifications obtained in another Member State. Recognition of a qualification obtained in a third country falls largely outside the PQD's scope²¹², leaving EU nationals with TCQ in a gap that the Single Market framework does not yet fully address.

Should a new legal framework be introduced for TCNs with TCQs seeking recognition to access regulated professions, equivalent provisions would be provided for EU citizens with TCQs through amendments to the PQD.

²¹² Except for the specific scenario described in Art. 3(3) PQD where an EU citizen whose third-country qualification was recognized in a MS, and who has exercised the profession there for 3 years, moves to a second MS and seeks recognition there. In that case the second MS will have to treat the third-country qualification as evidence of formal qualifications and apply the PQD rules when conducting the recognition procedure.

The table below maps these three scenarios to their personal scope, the typical qualification type involved, and the legal instrument through which each is addressed.

Group	Typical qualification	Legal basis	IA/Instrument
TCN (primary scope)	Obtained in a third country	Art. 79(2)(a) and (b) TFEU	Action 3
TCN with EU qualifications	Obtained in another MS	Art. 79(2)(a) and (b) TFEU	Action 3
EU nationals with TCQ	Obtained outside the EU	Arts. 46, 53 TFEU (Single Market)	Targeted amendments — PQD

17. THE EU TALENT ECOSYSTEM — ATTRACT, MATCH, RECRUIT

The EU has established an ecosystem of policy instruments to address its labour market needs through legal migration. These instruments span three functions: attracting skilled workers to consider the EU as a destination; matching available talent with employer demand; and enabling the legal and administrative steps through which a TCN can take up work in the EU. Across all three functions, the EU's ecosystem is well-developed and continues to evolve. The analysis below highlights that while these instruments refer to recognition of qualifications none of the instruments governs how recognition procedures are managed despite the fact that recognition is a distinctive procedural requirement within this ecosystem.

17.1.1. Attract

The instruments in this section primarily serve the function of making the EU a more attractive destination for skilled TCN, building its profile as a viable option in the global competition for talent, and creating structured pathways through which prospective migrants can learn about and access EU labour markets.

i. EU Talent Pool

EU Talent Pool. The Regulation establishing an EU Talent Pool was adopted on 29 April 2026. Once operational, the EU Talent Pool will be the first EU-wide matching tool connecting jobseekers from third countries residing outside the EU with employers in MS experiencing EU-wide shortages. It will also facilitate recruitment of non-EU talent also by providing online information on national recruitment and migration rules, as well as recognition procedures.

The EU Talent Pool is a platform connecting TCN jobseekers with EU employers. Participating employers can post vacancies and TCN from third countries and those already residing in EU Member States can register their profiles for matching.

On recognition: the Talent Pool can flag information about recognition procedures applicable in the relevant Member State and profession, and the accompanying measures under all three policy options include strengthening this information function. However, the Talent Pool has no capacity to influence the nature, duration, cost or outcome of recognition procedures themselves. A TCN successfully matched through the Talent Pool with an employer in a regulated profession must still undergo the full national recognition procedure in the receiving Member State, under the same conditions and with the same uncertainties that apply without

the Talent Pool. The platform improves the upstream information environment but does not alter the nature of procedures.

Under the baseline, it will not structurally address the organisation, design or functioning of recognition systems.

ii. Talent Partnerships

The Commission has launched Talent Partnerships with key partner countries to facilitate legal labour mobility to the EU, 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. Officially launched in 2023, they are currently operational with Morocco, Tunisia, Egypt, Pakistan and Bangladesh.

On recognition: Talent Partnerships engage with recognition by supporting skills development aligned to EU standards and by facilitating pre-departure preparation but they do not bind Member State competent authorities, do not harmonise procedures, and do not create enforceable rights for TCN once they have arrived. The pre-departure work they support improves the quality and readiness of applications but cannot eliminate the procedural divergences or documentation burdens that applicants face on arrival.

iii. European Legal Gateway Office pilot (India)

The Commission launched in February 2026 a first European Legal Gateway Office pilot in India to facilitate mobility of Indian ICT talent to the EU, functioning as a one-stop hub providing information on legal mobility pathways and advertising work and study opportunities. It will also support European employers in accessing the Indian ICT talent pool. Following lessons from this pilot, the Commission will broaden its scope to more sectors and partner countries.

The European Legal Gateway Office (ELGO) cannot alter the procedures themselves once a TCN enters a Member State system. Recognition procedures remain governed by national law, and the ELGO's guidance is necessarily general and cannot substitute for the MS-level and profession-specific procedural clarity that applicants require.

iv. EU Immigration Portal

The EU Immigration Portal provides prospective migrants with general information on legal pathways to the EU, entry requirements, visa categories and living conditions across Member States. It is a public-facing information resource designed to increase the accessibility of information about EU migration options.

On recognition: the Portal provides general information about recognition procedures and can link to national sources. It does not provide procedure-specific, profession-specific or Member State-specific recognition guidance of the depth needed by applicants preparing a recognition application. The fragmentation of national systems that constitutes Driver 1 means that accurate and comprehensive recognition guidance cannot be presented in a single generic platform without MS-level and profession-level detail that the Portal does not offer. The Portal addresses information access at a general level; it does not address the procedural realities that applicants face.

17.1.2. Match

The instruments in this section primarily serve the function of connecting the supply of talent with labour market demand through transparency tools, qualification frameworks, skills classifications and employment services that make it easier for employers and workers to identify mutual fit across different national contexts.

i. European Qualifications Framework (EQF)

The European Qualifications Framework (EQF), in place since 2008 (and reviewed in 2017), aims to increase the transparency, comparability and portability of people's qualifications. The EQF as a framework consists of 8 levels from basic (level 1) to advanced (level 8), based on learning outcomes (know, skills, autonomy and responsibility). It operates as a translation tool between national qualifications as part of national qualifications frameworks (NQFs) that have been referenced to the EQF, through which connections are established between the national and European qualification levels. EQF comparisons with third-country qualifications frameworks are a stated accompanying measure under all three policy options and are a meaningful contribution to improving the long-term comparability of qualifications.

On recognition: the EQF improves comparability at the framework level but does not bind MS in individual recognition decisions. The EQF does not resolve the divergences between national assessment criteria, documentation requirements or compensation measure thresholds. The EQF improves the comparability of qualifications but does not eliminate the procedural and institutional sources of divergence. Where third-country qualifications frameworks are not yet comparably developed or formally compared with the EQF, trust issues also remains fully operative.

ii. ESCO (European Skills, Competences, Qualifications and Occupations)

ESCO is the EU's multilingual classification of skills, competences, qualifications and occupations, designed to improve transparency and matching across EU labour markets. It enables employers and employment services to describe vacancies and worker profiles in a common language that crosses national boundaries.

On recognition: ESCO is a classification system, not a recognition instrument. It has no procedural role in MS decisions and does not generate binding comparability assessments. Its contribution to the recognition problem is as a shared vocabulary for skills and competences which can reduce the interpretive burden on MS assessing unfamiliar qualifications, but this does not address the structural sources of divergence, procedural burden or trust deficit described in the problem drivers.

iii. Europass

The Europass Decision of 2018 (replacing the Decision of 2004) offers a common framework for the provision of better services for skills and qualifications and serves as a comprehensive platform for career management and lifelong learning in Europe. Through the Europass platform it operates as a one-stop shop for different skills, qualifications and labour mobility tools, including an E-portfolio with a smart CV, information on qualifications (from NQF registers) and learning opportunities (from national registers/databases) and an infrastructure for digital credentials (the European Digital Credentials for Learning). The Europass Platform

also includes dedicated webpages for TCN²¹³. The Europass Platform is also the platform for the EQF. The Europass framework includes three supplements: the Diploma Supplement, the Certificate Supplement, and Europass Mobility.

On recognition: Europass enables self-presentation; it does not generate recognition decisions and is not binding on MS. A Europass document containing a TCN's qualifications does not substitute for a formal recognition procedure, nor does it reduce the documentation burden imposed by MS.

iv. EURES

EURES is the EU job mobility portal and network, designed to facilitate intra-EU labour mobility by connecting jobseekers and employers across Member States. It provides information on working conditions, job opportunities and living conditions, and is supported by a network of EURES advisers in Member States and cross-border partnerships.

On recognition: EURES is primarily designed for intra-EU mobility and its TCN-specific functionality is limited. It does not address recognition procedures for TCN and has no role in the procedural framework within which recognition decisions are made.

v. Public Employment Services (PES)

National Public Employment Services, coordinated at EU level through the European Network of Public Employment Services, can provide skills assessment, employment counselling and integration support for TCN. In some Member States, PES play an active role in supporting TCN in navigating recognition and validation procedures. Several Talent Partnerships involve PES in pre-departure skills development.

On recognition: PES operate under national frameworks, and their role in recognition for TCN is highly variable across Member States. In some MS, PES provide navigation and support; in others, their mandate does not extend to recognition procedures for TCN. There is no harmonised EU-level role for PES in recognition, and their capacity to address the structural divergences is limited. PES can support individuals through the system but cannot change the system itself.

17.1.3. Recruit

Over the past two decades, the EU has developed a substantial legal framework for the entry and residence of TCN. 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 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. Several of these directives include equal treatment provisions extending certain recognition-related rights to TCN admitted under their scope. While their requirements for the migration procedure as a whole – such as deadlines – might in some cases also indirectly create boundaries for recognition processes - none of those instruments create comprehensive and binding procedural standards for the organisation or functioning of recognition procedures.

²¹³ [Third-country nationals and Europass](#)

i. EU Blue Card Directive

The EU Blue Card Directive (2009/50/EC), as amended by Directive (EU) 2021/1883²¹⁴, establishes a harmonised scheme for highly qualified workers from outside the EU, enabling them to live and work in participating MS. To qualify, applicants must hold advanced qualifications—typically a university degree or equivalent professional experience—and secure a job offer meeting a specific salary threshold, with lower salary thresholds and qualification requirements for specific profiles such as IT specialists. The Blue Card Directive grants holders a minimum 24-month residence (except if the work contract is for a shorter term), equal treatment with nationals in key areas such as employment conditions and recognition of qualifications as well as facilitated family reunification, and intra-EU mobility rights after 12 months. MS are under the obligation to process complete applications in 90 days, reduced to 30 days in case of pre-registered employers. In case of intra- EU mobility, EU Blue Card holders shall enjoy equal treatment with Union citizens as regards recognition of professional qualifications for regulated professions, in accordance with applicable Union and national law.

On recognition: the Blue Card includes a qualification threshold as an admission condition — applicants must demonstrate that they hold the qualifications required for the relevant job. This creates a qualification check within the migration procedure. This check is an eligibility check for admission conducted by migration authorities. Equal treatment provisions in the Directive confer rights on Blue Card holders once admitted, but do not govern the nature of national recognition procedures.

ii. Single Permit Directive

The Single Permit Directive (2011/98/EU), as amended by Directive 2024/1233²¹⁵, simplifies and harmonises the procedures for non-EU nationals seeking to work and reside in an EU Member State by introducing a single application process for a combined work and residence permit. Under this Directive, TCN—regardless of skill level—can apply for a unified permit that grants both the right to work and the right to reside, reducing administrative burdens for applicants and employers alike. The Directive ensures equal treatment with national workers in key areas such as working conditions and recognition of qualifications. MS retain discretion over admission criteria but must adopt a decision on a complete application for a single permit within 90 days (possibly extended by 30 days in very complex cases) and provide transparent reasoning for any rejections.

On recognition: the Single Permit Directive does not address qualification recognition. Equal treatment provisions apply to working conditions once the TCN is admitted and working, but do not create procedural rights in the context of recognition applications to competent authorities. The Directive facilitates admission and residence; it does not govern the assessment of qualifications.

iii. Seasonal Workers Directive

Directive 2014/36/EU sets the conditions of entry and residence for TCN to the EU for the purpose of seasonal work, establishing a common legal framework across MS and ensuring transparent and streamlined application procedures, adequate accommodation during the stay, equal treatment rights with nationals related to, among others, working conditions, certain

²¹⁴ Directive (EU) 2021/1883. Available at: <http://data.europa.eu/eli/dir/2021/1883/oj>

²¹⁵ Directive (EU) 2024/1233. Available at: <https://eur-lex.europa.eu/eli/dir/2024/1233/oj/eng>

branches of social security, recognition procedures. The directive allows for stays of up to 5–9 months (depending on national rules), facilitates re-entry for recurring seasonal work for compliant workers, and aims to prevent abuse and exploitation while addressing labour market needs in sectors such as agriculture and tourism²¹⁶. MS are under the obligation to notify the adoption of a decision on a complete application in 90 days.

On recognition: this Directive address specific categories of TCN (seasonal workers employed in sectors with temporary demand peaks), and establish harmonised entry, residence and rights conditions for those categories. The Directive does not address qualification recognition.

iv. ICT Directive

The Intra-Corporate Transfer Directive (2014/66/EU) establishes a scheme for non-EU managers, specialists, and trainee employees temporarily transferred within multinational companies to the EU within the same undertaking or group of undertakings. To be granted an EU intra-corporate transferees permit, applicants have to meet certain conditions such as present a valid work contract and provide evidence of the necessary professional qualifications. The Directive ensures equal treatment with nationals regarding certain aspects, such as recognition of qualifications. It facilitates intra-EU mobility, if conditions are met, allowing transferees to move to another Member State for short-term assignments (up to 90 days) or longer stays.

On recognition: this Directive address specific categories of TCN (employees transferred within multinational companies), and establish harmonised entry, residence and rights conditions for those categories. The Directive does not address qualification recognition.

v. Students and Researchers Directive

Directive 2016/801/EU, sets out the conditions for entry and residence of TCN coming to the EU for studies and research purposes as well as, training, voluntary service, pupil exchange, educational projects, and *au pairing*²¹⁷. It aims to promote mobility and legal migration for education and research purposes by determining the conditions for admission procedures across MS and allowing for mobility within the EU during their stay. It lays down certain (i) general conditions, such as sufficient financial resources and health insurance, as well as (ii) specific admission criteria, such as proof of acceptance by a higher education institution or of a hosting agreement with a research organisation. The Directive ensures equal treatment with nationals in key areas such as working conditions and recognition of qualifications. Under the Directive, MS must process complete applications within 90 days (or 60 days if it relates to an approved host entity)

On recognition: this Directive address specific categories of TCN (students, learners and researchers), and may require qualification recognition for the purposes of access to learning (which is not in scope of this action).

Residence and family directives

vi. Long-term Residents Directive.

²¹⁶ Directive 2014/36/EU. Available at: <https://eur-lex.europa.eu/eli/dir/2014/36/oj/eng>

²¹⁷ Directive (EU) 2016/801. Available at: <http://data.europa.eu/eli/dir/2016/801/oj/eng>

The LTR Directive (2003/109/EC) establishes a harmonised legal framework for non-EU nationals to acquire and maintain long-term resident (LTR) status in an EU Member State after five years of continuous and lawful residence, promoting their integration and equal treatment while balancing national discretion²¹⁸. Applicants need to meet certain integration and financial requirements. Residence permits are valid for at least 5 years and automatically renewable. The directive aims to promote the integration of TCN and strengthen their rights across the EU, while allowing MS to retain control over immigration volumes. MS must give a decision on complete applications within 6 months of receiving them.

On recognition: Once granted, long-term resident status offers equal treatment with EU citizens in key areas such as employment, education, and social security and qualification recognition. The directive also allows long-term residents and their family members to move and reside in other MS for work, study, or other purposes. The right to equal treatment regarding recognition of qualifications also applies upon reception of a residence permit in a second Member State.

vii. Family Reunification Directive (2003/86/EC)

The **Family Reunification Directive** establishes a common legal framework for non-EU nationals legally residing in an EU Member State to be joined by their family²¹⁹. To be eligible for family reunification, non-EU nationals asking for a family member to join them in the EU must hold a residence permit valid for at least one year issued by a MS and have the legal option of long-term residence. Family members of the foreign national are entitled to a residence permit of the same duration as that of the person they have joined. MS must examine an application within 9 months after submission.

On recognition: TCN should also have access to education, employment and vocational training on the same terms as the person they joined although MS may require a labour market test before granting access to employment in the first 12 months.

viii. Qualification Regulation.

The Qualification Regulation (due to enter into force on 1 July 2026) sets out common standards across the EU for granting international protection to TCN or stateless persons who qualify as refugees or as beneficiaries of subsidiary protection.²²⁰ It defines the criteria for protection status and associated rights (including access to employment, education, and recognition) and ensures consistent application across MS. It mandates that MS shall assist TCN with the recognition of their qualifications.²²¹ 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.²²²

ix. Reception Conditions Directive.

Directive (EU) 2024/1346 establishes harmonised minimum reception standards for applicants for international protection across EU MS (excluding IE and DK), ensuring that asylum seekers

²¹⁸ Council Directive 2003/109/EC. Available at: <https://eur-lex.europa.eu/eli/dir/2003/109/oj/eng>

²¹⁹ Council Directive 2003/86/EC. Available at: <https://eur-lex.europa.eu/eli/dir/2003/86/oj/eng>

²²⁰ Regulation (EU) 2024/1347. Available at: <http://data.europa.eu/eli/reg/2024/1347/oj>

²²¹ Art. 28, Directive 2011/95/EU. Available at: <https://eur-lex.europa.eu/eli/dir/2011/95/oj/eng>

²²² See Art. 28, Directive 2011/95/EU [2011] OJ L 377/9; Art. 30, Regulation (EU) 2024/1347 [2024] OJ L 1/34.

and their family members receive adequate material conditions.²²³ 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”²²⁴ and mandates that “MS 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.”²²⁵ 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.²²⁶ Nevertheless, under the Reception Condition Directive MS may restrict the right to equal treatment for the first three months after registration of the application for international protection.²²⁷

Both instruments therefore provide similar equal treatment rights and oblige MS 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.²²⁸ At present 12 EU MS (AT, DE, EL, FR, HR, IE, IT, LV, NL, PL, PT, RO) participate in the initiative.

17.2. Recognition-specific instruments

The instruments in this section include both EU law and non-legislative frameworks linked to recognition of qualifications. The analysis examines their scope, and how they relate to recognition of qualifications of TCN.

i. Professional Qualifications Directive (Directive 2005/36/EC)

In terms of binding rules for recognition of qualifications, Directive 2005/36/EC (the PQD) lays down a legal framework for recognition of qualifications where access to regulated professions is sought, but its scope is limited to EU nationals (Art. 2(1)). Recital 10 clarifies that MS can recognise, in accordance with their national law, the qualifications of TCN obtained outside the EU, as long as they respect the minimum training conditions set out in the Directive for specific professions. TCN therefore only benefit indirectly from the PQD framework, when falling under the equal treatment provisions in EU migration instruments, and only in two specific scenarios:

- **First recognition inside the EU:** national rules and procedures of the host Member State apply in full, since the PQD does not affect the initial recognition of TCQ (Art. 2(2)). However, for those TCN holding qualifications obtained in another Member State, the equal treatment obligation means the PQD rules apply.
- **Subsequent recognition in a second Member State:** where a TCN enjoys intra-EU mobility rights and has practised the regulated profession for at least three years in the

²²³ Directive (EU) 2024/1346. The Directive is due to be transposed by 12 June 2026. Available at: <https://eur-lex.europa.eu/eli/dir/2024/1346/oj/eng>

²²⁴ Art. 17(3)(d) Directive (EU) 2024/1346, [2024] OJ L 1/35

²²⁵ Art. 17(8) Directive (EU) 2024/1346

²²⁶ Art. 17(3)(e) Directive (EU) 2024/1346

²²⁷ Art. 17(4)(c) Directive (EU) 2024/1346.

²²⁸ Council of Europe. European Qualification Passport for Refugees. Available at: <https://www.coe.int/en/web/education/recognition-of-refugees-qualifications>

first Member State, recognition in a second Member State may proceed under the general system rules of the PQD (Art. 3(3)), subject to equal treatment requirements.

The PQD has also taken on board CJEU case law requiring CA to take due account of qualifications and experience gained outside the EU when assessing equivalence and contemplating compensation measures (Articles 14(5) and 55(a)). Given that the PQD only applies to EU nationals and primarily targets qualifications obtained in another EU Member State, **its contribution to facilitating recognition for TCN is limited**. Moreover, since its scope is confined to recognition for access to a regulated profession, it does not address the structural misalignment between migration systems and recognition frameworks.

ii. **Commission Recommendation (EU) 2023/2611 on the recognition of qualifications of TCN**

The 2023 Recommendation is the main EU-level instrument specifically addressed to the recognition of TCN qualifications. It recommends that Member States simplify recognition procedures, reduce documentation burdens, improve the predictability of timelines, ensure better coordination between recognition and migration procedures, and enhance information provision for applicants and employers. It is addressed to Member States and relies on voluntary uptake and peer learning for its implementation.

On recognition: the Recommendation correctly identifies the problem drivers and recommends appropriate responses. Its limitation is structural: as a non-binding instrument, it cannot create enforceable procedural rights, impose deadlines, harmonise documentation requirements, or mandate coordination between competent authorities and migration authorities. Member States may choose to implement its recommendations, partially implement them, or not implement them at all, without legal consequence. Implementation in the period since November 2023 has been uneven, and the core barriers — divergent national systems, burdensome procedures, lack of trust — continue to operate at full force across most Member States. The Recommendation has catalysed useful discussions and has provided a political signal of EU-level concern; it has not materially altered the procedural reality for TCN applicants. Policy Option 1, the soft-law option assessed in this IA, represents an extension and operationalisation of the Recommendation's logic; the gap between the Recommendation and a binding legislative framework is precisely what Policy Options 2 and 3 are designed to close..

iii. **Commission Recommendation (EU) 2022/554 on the recognition of qualifications of people fleeing Russia's invasion of Ukraine**

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 MS to adopt specific measures to facilitate the recognition of qualifications obtained in Ukraine. Various MS (AT, BE, EE, ES, IT, LT, LV, PL, PT, RO) introduced temporary waivers to qualification recognition requirements for displaced Ukrainian professionals in target occupations, allowing early access to professional practice under the supervision of locally qualified professionals. These approaches demonstrated the flexibility of contemporary regulatory systems in emergencies. However, only in a small number of countries (AT, HU, PL) do favourable conditions exist for the recognition of Ukrainian professionals who have practised under a waiver. In most cases, the absence of a clear pathway allowing these professionals to obtain full recognition after a period of supervised practice is a missed opportunity — for the professionals themselves and for EU and Member State economies. The prolonged ad hoc treatment for Ukrainian qualifications has also raised equity concerns vis-à-vis the many TCN who have been struggling for years to obtain recognition of their foreign-acquired qualifications.

iv. **Mutual Recognition Agreements (MRAs)**

EU trade policy provides an additional framework for recognition of qualifications with third countries. Through MRAs, whether standalone or embedded in free trade agreements, the EU and third countries can set out dedicated recognition processes for specific sectors. MRAs are reciprocal by nature. While interest in concluding MRAs on professional qualifications has recently increased, so far the EU has concluded only one such agreement — the Mutual Recognition Agreement on the professional qualifications of architects with Canada. Their piecemeal approach, focusing on a specific third country and profession, limits their overall impact on addressing large-scale labour market needs.

On recognition: MRAs provide binding, profession-specific recognition arrangements for the covered qualifications and countries. MRAs are a complement to, not a substitute for, a generalised procedural framework. They will continue to develop under the baseline but will not structurally address the scale or systemic nature of the problem.

v. **ENIC-NARIC Network**

The ENIC-NARIC²²⁹ network established as centres for academic recognition of qualifications under the principles of the Convention on the Recognition of Qualifications concerning Higher Education in the European Region, also referred to as [Lisbon Recognition Convention](#). ENIC-NARIC centres provide advice (and depending on the national situation may take decisions) on how foreign qualifications compare to national ones, typically resulting in statements of comparability. Originally established as centres for academic recognition of qualifications under the principles of the Lisbon Recognition Convention, their activities mostly focused on the official recognition procedures of Higher Education qualifications obtained in another EU Member State when these were required to access regulated professions, and statements of equivalence for Higher Education qualifications to access non-regulated professions. While mainly focusing on higher education, over time, ENIC-NARIC centres have expanded their role with several projects within the network focusing on VET²³⁰. The standards and guidelines for aspects of recognition by the ENIC-NARICs are described in the [European Area of Recognition eManual](#).

On recognition: ENIC-NARIC centres are among the most important existing institutional actors in the TCN recognition system, and their expertise in third-country qualifications systems is a central resource that this action builds on. The institutional separation between ENIC-NARIC centres, which typically deal only with recognition for the purposes of access to higher education, and professional competent authorities contributes directly to the parallel procedures problem. In Member States where an ENIC-NARIC statement is a mandatory precondition for CA recognition, a TCN undergoes two sequential procedures before a recognition decision is reached, adding one to three months to the overall timeline.

²²⁹ ENIC is the European Network of Information Centres and NARIC are National Academic Recognition Information Centres in the European Union

²³⁰ The BRAVO project - Bridging a European Network for Recognition of Vocational Qualifications - <https://hkdir.no/en/bravo>

18. VALIDATION OF SKILLS OF TCN

18.1. The 2012 Council Recommendation on validation

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 MS and its use in the context of TCN remains uneven.

Building on the 2012 Council Recommendation, validation systems across MS have evolved towards more structured, transparent and effective procedures. This is particularly important because focusing only on the recognition of formal qualifications limits the potential to address labour market shortages that could otherwise be mitigated through validation of skills acquired outside

ANNEX 9: MAPPING OF RECOGNITION PROCEDURES TO ACCESS REGULATED PROFESSIONS AND AS PART OF MIGRATION PROCEDURES IN EU MS

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 encompass 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 A9.1 - Member States and professional coverage from the survey targeted at CAs²³¹

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)

²³¹ 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

Type of professions	Number of responses	Member States covered
Education and teaching (e.g. school teachers, 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: CA survey

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 organisations (IOs), providing their perspectives on both recognition procedures and migration-related qualification checks.

Table A9.2 – 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	

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.

a) Recognition of qualifications for access to regulated professions

a) 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**.²³² 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**.²³³ 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.²³⁴

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).²³⁵

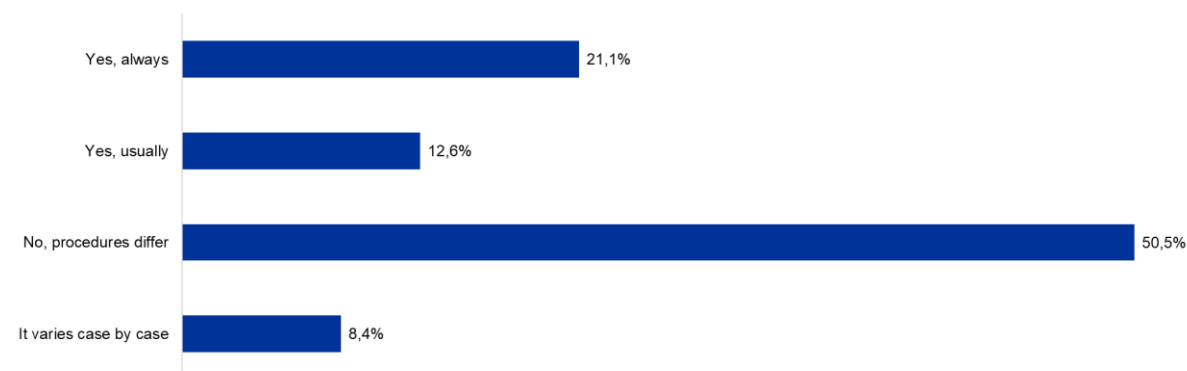
²³² CA Survey, Q.5 (n=190); CA Survey, Q5.a (n=96), open question.

²³³ 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.

²³⁴ CA Survey, Q5.a (n=13), open question.

²³⁵ CA Survey, Q.5 (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 1 - 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: CA survey

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).²³⁶

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 A9.3 -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)

²³⁶ CA Survey, Q.5 (n=190)

Profession	It varies case by case	No, procedures differ	Not sure	Yes, always	Yes, usually
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)
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: CA survey

As shown in Table A9.3, **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.²³⁷ 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);

²³⁷ CA Survey, Q.5 (n=190)

- **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).

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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 pronounced, as evidenced by the EMN ad hoc query on the recognition of third-country qualifications.²³⁹ 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.**²⁴⁰

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.²⁴¹ 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.²⁴² 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).²⁴³ 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.²⁴⁴ 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).²⁴⁵ By

²³⁸ CA Survey, Q5.a (n=96)

²³⁹ EMN, 2024. Ad-Hoc Query 2024.16 on Recognition of third-country qualifications for the profession of doctor with basic medical training.

²⁴⁰ EMN, 2024. Ad-Hoc Query 2024.16 on Recognition of third-country qualifications for the profession of doctor with basic medical training; CA Survey, Q.5 (n=190)

²⁴¹ EMN (2024)

²⁴² EMN (2024); CA Survey, Q5.a (n=96)

²⁴³ EMN (2024); CA Survey, Q5.a (n=96)

²⁴⁴ EMN (2024); CA Survey, Q5.a (n=96)

²⁴⁵ EMN (2024); CA Survey, Q5.a (n=96)

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 practice, temporary or restricted licences and final authorisation.²⁴⁶ 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 the PQD are recognised automatically.²⁴⁷

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.²⁴⁸

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.

b) Cooperation — within Member States, between Member States, and with third countries

The level of **cooperation 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**.²⁴⁹

This suggests that, in most cases, cooperation structures are well established at national level and embedded within existing administrative ecosystems.

²⁴⁶ EMN (2024)

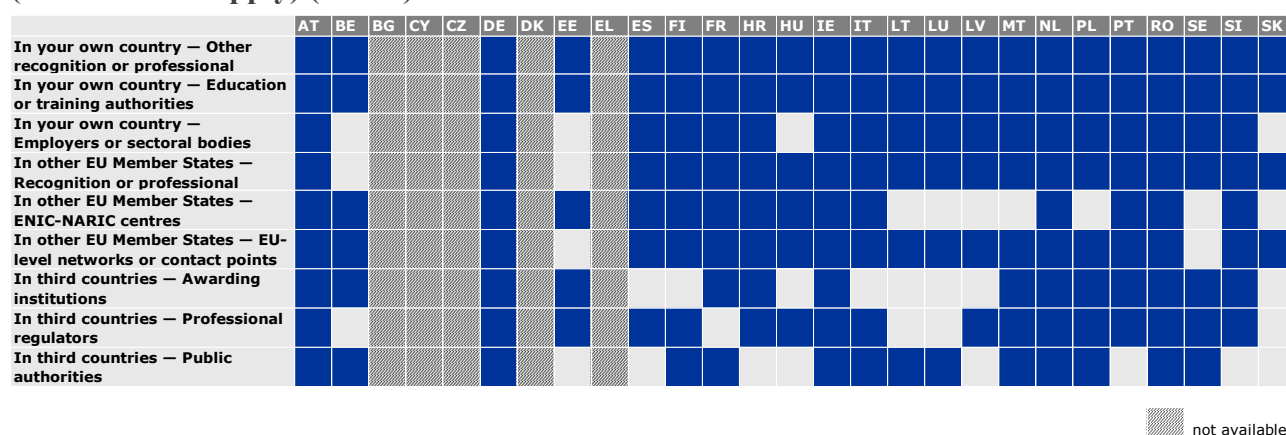
²⁴⁷ EMN (2024)

²⁴⁸ EMN (2024)

²⁴⁹ CA Survey, Q31 (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.²⁵⁰ 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.²⁵¹ A more detailed breakdown of these cooperation patterns across Member States is presented in the figure below.

Figure 2 - Do you cooperate with any of the below organisations on cases involving TCQs? (Select all that apply) (n=190)



Source: CA survey

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).²⁵²

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 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.

²⁵⁰ CA Survey, Q31 (n=190)

²⁵¹ CA Survey, Q31 (n=190)

²⁵² CA Survey, Q31 (n=190)

Such agreements are exceptional in the EU context. **The France–Québec Accord**²⁵³ 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.**

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;²⁵⁴
- **Latvia’s simplified procedures for medical doctors and dentists** trained in a predefined list of trusted third countries;²⁵⁵
- **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.²⁵⁶

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 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;²⁵⁷

²⁵³ Agreement Between Québec and France on the Mutual Recognition of Professional Qualifications, 2008. Available at: [Québec-France agreement on the recognition of professional qualifications \(This document does not have official value\)](#)

²⁵⁴ 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.

²⁵⁵ World Directory of Medical Schools. Available at: [World Directory of Medical Schools](#)

²⁵⁶ 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.

²⁵⁷ Global Skill Partnerships. Available at: [Home - Global Skill Partnerships](#)

- **VET-focused cooperation** between Member States such as Austria and Western Balkan countries, aimed at capacity building and labour-market integration;²⁵⁸
- **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.²⁵⁹

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.

c) 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).

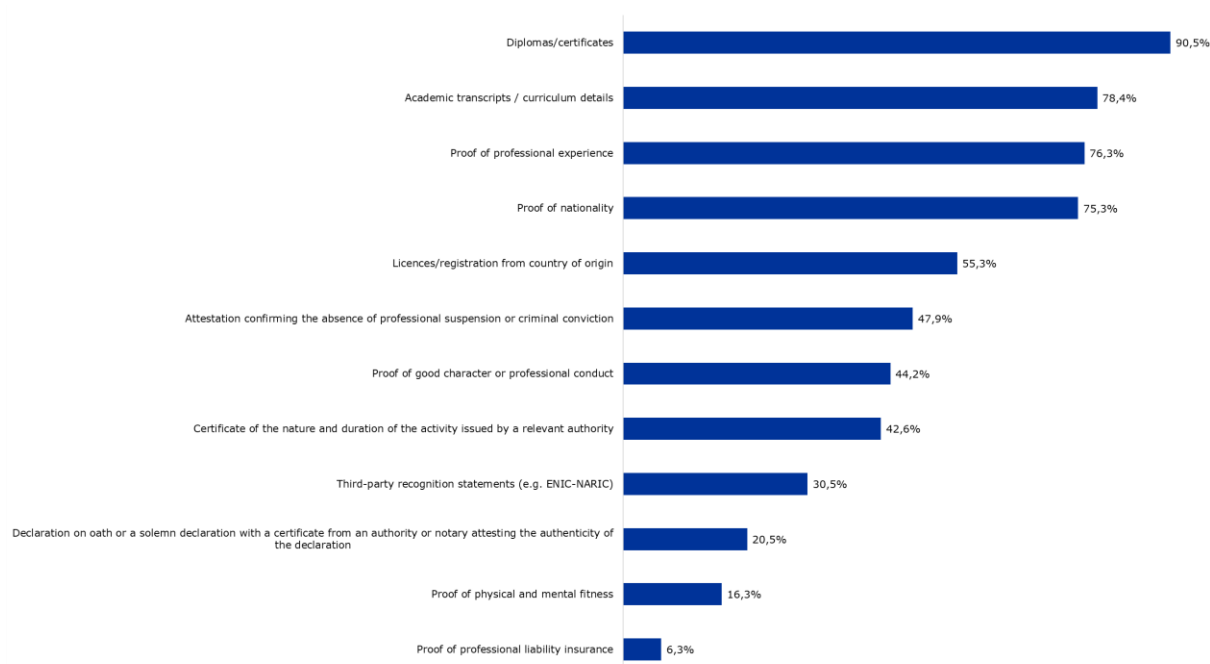
Documentation requirements constitute a central component of application procedures for TCNs seeking access to regulated professions. As shown in figure below, the documents that are most commonly required by CAs are: **diplomas/certificates** (90,5%), **academic transcript and curriculum details** (78,4%), **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.²⁶⁰

²⁵⁸ 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](#)

²⁵⁹ Focus Group on information and support to TCNs with ENIC NARIC centres, PES and CSOs (n=28);

²⁶⁰ CA Survey, Q10 (n=190)

Figure 3 - Which documents are typically required from third-country applicants? (Select all that apply) (n=190)²⁶¹



Source: CA survey

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 profession²⁶² 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).²⁶³

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

²⁶¹ CA Survey, Q10 (n=190)

²⁶² CA Survey, Q10 (n=190)

²⁶³ 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.

appear to be more sector-specific or linked to professions involving health, safety, or risk-related responsibilities.²⁶⁴

The table below shows how documents requirements vary across Member States.

Figure 4 – Documents requirements across Member States²⁶⁵

	AT	BE	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IE	IT	LT	LU	LV	MT	NL	PL	PT	RO	SE	SI	SK
Diplomas/certificates																											
Academic transcripts / curriculum details																											
Proof of professional experience																											
Proof of nationality																											
Licences/registration from country of origin																											
Attestation confirming the absence of professional suspension / criminal conviction																											
Proof of good character or professional conduct																											
Certificate of the nature and duration of the activity issued by a relevant authority																											
Third-party recognition statements																											
Declaration on oath/ solemn declaration attesting the authenticity of the declaration																											
Proof of physical and mental fitness																											
Proof of professional liability insurance																											

not available

Source: CA survey

Documentation requirements vary depending on the type of profession concerned. For instance, taking into account relevant professions, i.e. doctors, nurses and midwives) the type of document requirements vary across Member States.

Overall, to access the professions of nurses (Figure 10) and midwives (Figure) 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).

Figure 5 – Overview of documents required for nurses across Member States

	AT	BE	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IE	IT	LT	LU	LV	MT	NL	PL	PT	RO	SE	SI	SK
Diplomas/certificates																											
Academic transcripts / curriculum details																											
Proof of professional experience																											
Proof of nationality																											
Licences/registration from country of origin																											
Attestation confirming the absence of professional suspension / criminal conviction																											
Proof of good character or professional conduct																											
Certificate of the nature and duration of the activity issued by a relevant authority																											
Third-party recognition statements																											
Declaration on oath/ solemn declaration attesting the authenticity of the declaration																											
Proof of physical and mental fitness																											
Proof of professional liability insurance																											

Source: Websites of national CAs and CA survey

Figure 6 - Overview of documents required for midwives across Member States

²⁶⁴ CA Survey, Q10 (n=190)

²⁶⁵ 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.

	AT	BE	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IE	IT	LT	LU	LV	MT	NL	PL	PT	RO	SE	SI	SK
Diplomas/certificates																											
Academic transcripts / curriculum details																											
Proof of professional experience																											
Proof of nationality																											
Licences/registration from country of origin																											
Attestation confirming the absence of professional suspension /criminal conviction																											
Proof of good character or professional conduct																											
Certificate of the nature and duration of the activity issued by a relevant authority																											
Third-party recognition statements																											
Declaration on oath/ solemn declaration attesting the authenticity of the declaration																											
Proof of physical and mental fitness																											
Proof of professional liability insurance																											

Source: 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).²⁶⁶ As concerns doctors, evidence provides a slightly different picture, as showcased by the figure below.

Figure 7 - Overview of documents required for doctors across Member States

	AT	BE	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IE	IT	LT	LU	LV	MT	NL	PL	PT	RO	SE	SI	SK
Diplomas/certificates																											
Academic transcripts / curriculum details																											
Proof of professional experience																											
Proof of nationality																											
Licences/registration from country of origin																											
Attestation confirming the absence of professional suspension /criminal conviction																											
Proof of good character or professional conduct																											
Certificate of the nature and duration of the activity issued by a relevant authority																											
Third-party recognition statements																											
Declaration on oath/ solemn declaration attesting the authenticity of the declaration																											
Proof of physical and mental fitness																											
Proof of professional liability insurance																											

Source: CA survey, EMN AHQ²⁶⁷ 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 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.

²⁶⁶ Retrieved from websites of national CAs across Member States and CA survey.

²⁶⁷ EMN (2024)

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).²⁶⁸

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 1 - 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.²⁶⁹ 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: Evidence gathered from Focus Groups²⁷⁰

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**.²⁷¹ 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.²⁷²

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.²⁷³

²⁶⁸ CAs Survey; EMN (2024)

²⁶⁹ Focus Group with CAs from the regulated professions of electricians and crane operators (n=20)

²⁷⁰ Focus Group with CAs from the regulated professions of electricians and crane operators (n=20).

²⁷¹ CA Survey, Q11 (n=190)

²⁷² CA Survey, Q12 (n=190)

²⁷³ CA Survey, Q11 (n=190)

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.²⁷⁴ 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.²⁷⁵ The table below shows how documents requirements vary across Member States.

Figure 8 – Formal requirements across Member States²⁷⁶

	AT	BE	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IE	IT	LT	LU	LV	MT	NL	PL	PT	RO	SE	SI	SK
Certified translations are required																											
Paper/original documents are accepted																											
Digital or verifiable credentials are accepted																											
Legalisation or apostille is required																											

not available

Source: CA survey

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).²⁷⁷ 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).²⁷⁸ As concerns doctors, **traditional, document-heavy procedures remain the norm in most Member States**, as shown by the figure below.

Figure 9 – Overview of formal requirements for doctors across Member States

	AT	BE	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IE	IT	LT	LU	LV	MT	NL	PL	PT	RO	SE	SI	SK
Certified translations are required																											
Paper/original documents are accepted																											
Digital or verifiable credentials are accepted																											
Legalisation or apostille is required																											

Source: CA survey, EMN AHQ²⁷⁹ 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**

²⁷⁴ CA Survey, Q11 (n=190)

²⁷⁵ CA Survey, Q13 (n=190)

²⁷⁶ 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.

²⁷⁷ EMN (2024)

²⁷⁸ EMN (2024)

²⁷⁹ EMN (2024)

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 10 - Overview of formal requirements for midwives across Member States

	AT	BE	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IE	IT	LT	LU	LV	MT	NL	PL	PT	RO	SE	SI	SK
Certified translations are required																											
Paper/original documents are accepted																											
Digital or verifiable credentials are accepted																											
Legalisation or apostille is required																											

Source: CA survey, and national websites of CAs

Figure 11 - Overview of formal requirements for nurses across Member States

	AT	BE	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IE	IT	LT	LU	LV	MT	NL	PL	PT	RO	SE	SI	SK
Certified translations are required																											
Paper/original documents are accepted																											
Digital or verifiable credentials are accepted																											
Legalisation or apostille is required																											

Source: CA survey, and national websites of CAs

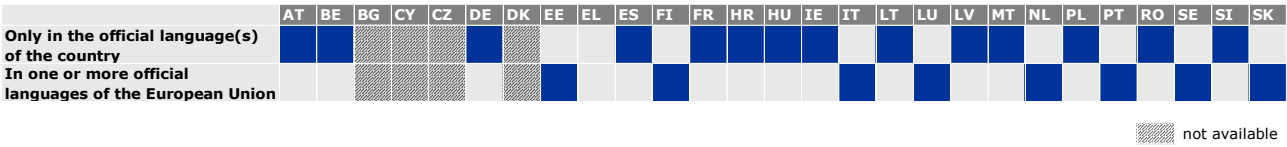
For midwives and nurses, **certified translations are required by all Member States** except PT, indicating that language validation remains a standard safeguard in cross-border recognition processes for regulated healthcare. Similarly, **paper or original documents are accepted almost universally** (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). 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) 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.²⁸⁰

²⁸⁰ CA Survey, Q19 (n=190). The language regime for the recognition application submission derives from the answer to the CA survey, “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.

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).²⁸¹ 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.²⁸²

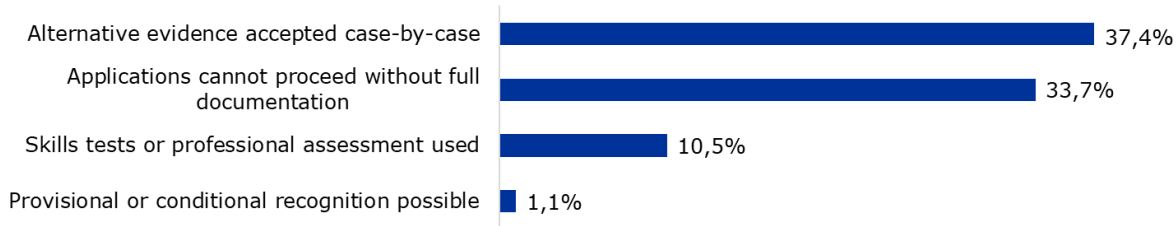
Figure 12 - In which language(s) can TCNs submit their application and required documents? (n=190)²⁸³



Source: CA survey

These findings point to significant variation in linguistic flexibility across Member States, with potential implications for accessibility and administrative burden for TCN applicants.²⁸⁴ 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%).²⁸⁵

Figure 13 - How are cases handled when third-country national applicants lack complete documentation (e.g. refugees/displaced persons)? (n=190)



Source: CA survey

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.

²⁸¹ EMN (2024)
²⁸² EMN (2024)
²⁸³ CA Survey, Q12 (n=190)
²⁸⁴ CA Survey, Q19 (n=190)
²⁸⁵ CA Survey, Q27 (n=190)

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.

d) 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).²⁸⁶ The table shows how compensation measures vary across MS.

Figure 14 - Type of compensation measures across EU Member States (n=190)²⁸⁷

	AT	BE	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IE	IT	LT	LU	LV	MT	NL	PL	PT	RO	SE	SI	SK
Tests or examinations																											
Bridging courses																											
Adaptation periods																											

not available

Source: CA survey

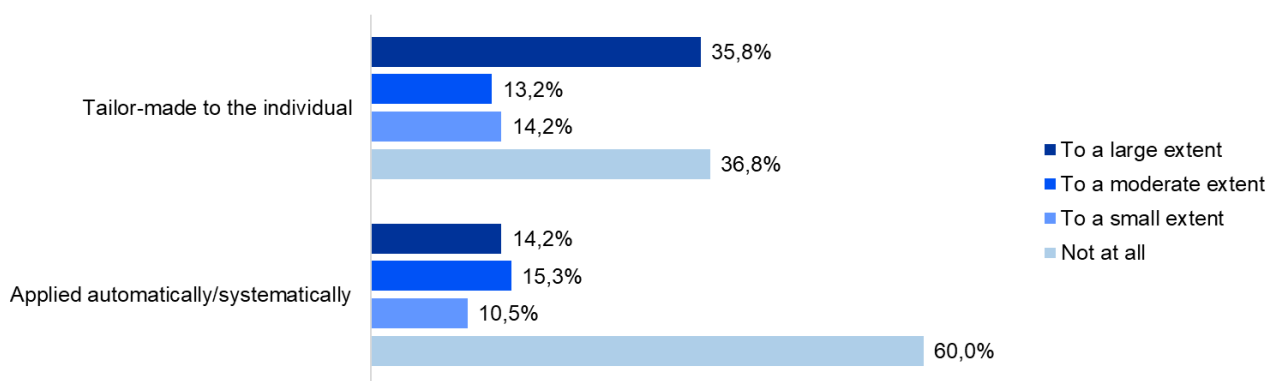
Overall, the evidence shows that the **application of compensation measures** in the recognition of TCN qualifications is **not systematic across Member States**. The majority of CAs (60%) confirm that compensation measures are not applied in a systematic manner. Within this group, approaches diverge significantly: while 35,8% of CAs state that **compensation measures are applied to a large extent in a case-by-case, tailor-made manner**, a similarly large share (36,8%) report that compensation measures are **not tailored at all to the individual TCN applicant**.²⁸⁸

Figure 15 - To what extent are compensation measures for third-country nationals:

²⁸⁶ CA Survey, Q6.b (n=69)

²⁸⁷ 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.

²⁸⁸ CA Survey, Q7 (n=190)



Source: CA survey

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).²⁸⁹ 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.²⁹⁰

The figure below provides an overview of the compensation measures for doctors with basic medical training applied across Member States.

Figure 16 – Overview of compensation measures for doctors with basic medical training across Member States

	AT	BE	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IE	IT	LT	LU	LV	MT	NL	PL	PT	RO	SE	SI	SK
Tests or examinations																											
Bridging courses																											
Adaptation periods																											

Source: CA survey, EMN AHQ²⁹¹ 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, 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.

²⁸⁹ EMN (2024)

²⁹⁰ 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).

²⁹¹ EMN (2024)

Figure 17 - Overview of compensation measures for midwives across Member States

	AT	BE	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IE	IT	LT	LU	LV	MT	NL	PL	PT	RO	SE	SI	SK
Tests or examinations																											
Bridging courses																											
Adaptation periods																											

Source: CA survey, EMN AHQ²⁹² 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 18 - Overview of compensation measures for nurses across Member States

	AT	BE	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IE	IT	LT	LU	LV	MT	NL	PL	PT	RO	SE	SI	SK
Tests or examinations																											
Bridging courses																											
Adaptation periods																											

Source: CA survey, EMN AHQ²⁹³ 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.

e) Processing timelines and costs for TCNs

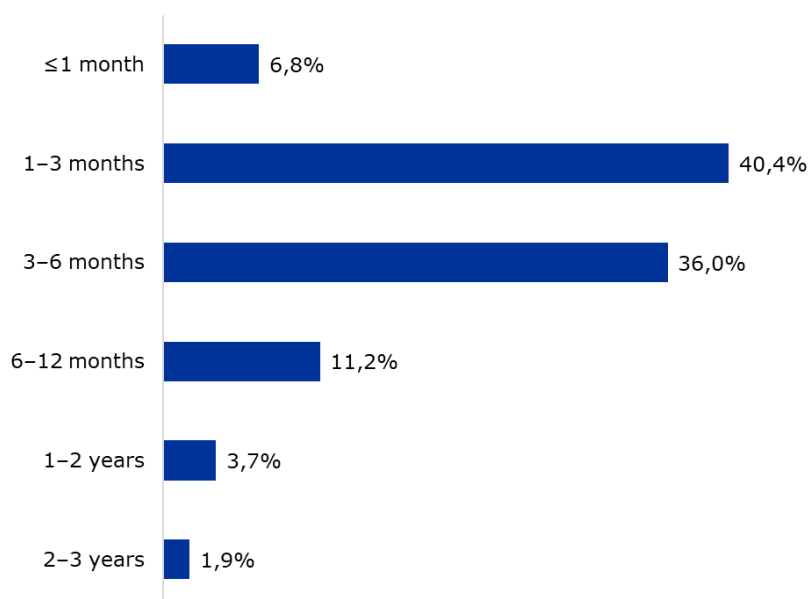
With regard to processing **timelines**, survey results indicate that, across most regulated professions, CAs report relatively moderate average durations between the submission of a complete application and the adoption of a decision, as presented in this section.

Figure 19 - In your experience, what is the average timeline from complete application to decision for third-country nationals? (n=161)²⁹⁴

²⁹² EMN (2024)

²⁹³ EMN (2024)

²⁹⁴ CA Survey, Q16 (n=161). 15 CAs have replied “Do not know” which have therefore been excluded from this count.

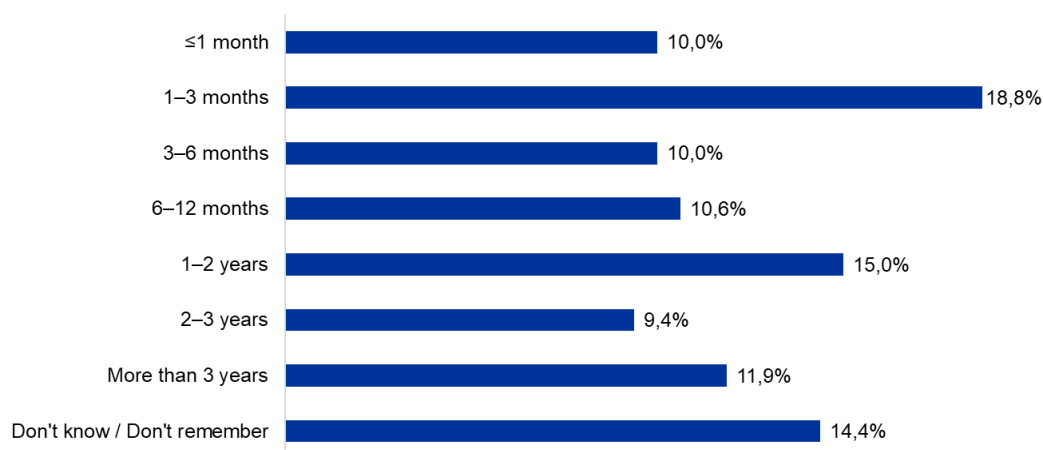


Source: CA survey

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).²⁹⁵

However, when considering answers from TCNs surveyed with a targeted survey and the PC analysis, results differ slightly as showcased in the figure below.

Table 3 - How long did the recognition process take? (n=160)²⁹⁶



Source: TCN survey 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

²⁹⁵ CA Survey, Q16 (n=190)

²⁹⁶ TCN Survey, Q13 (n=160)

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 . 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**.²⁹⁷

Figure 1 - 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)



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 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%).²⁹⁸ Overall, as shown in Annex 4.3, 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 22 -Costs borne by TCNs across EU Member States

	AT	BE	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IE	IT	LT	LU	LV	MT	NL	PL	PT	RO	SE	SI	SK
Certified translations of documents																											
Application or administrative fees																											
Authentication/ legalisation of documents																											
Additional training, examinations, tests																											
Declaration of value																											

not available

Source: CA survey

Overall, as shown in Annex 4.3, 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).

²⁹⁷ TCN Survey, Q18 (n=152)

²⁹⁸ CA Survey, Q17 (n=190)

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 8.11 for more details regarding fees incurred by TCNs by professions across EU member States).²⁹⁹ 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).³⁰⁰

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).³⁰¹ **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).³⁰²

f) 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.³⁰³

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.³⁰⁴

The figure below provides an overview of the overall degree of digitalisation across EU Member States (see Appendix for further details)

Figure 2 -Degree of digitalisation of recognition procedures across EU member States ³⁰⁵

²⁹⁹ CA Survey, Q17 (n=190)

³⁰⁰ CA Survey, Q17 (n=190); EMN (2024)

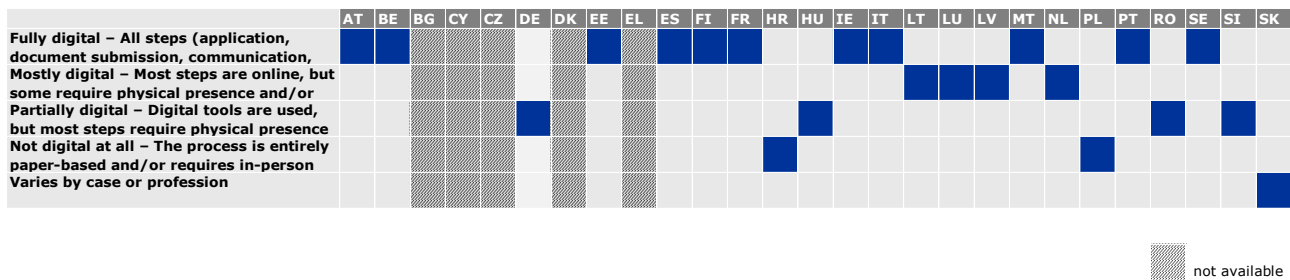
³⁰¹ CA Survey, Q17 (n=190); EMN (2024)

³⁰² CA Survey, Q17 (n=190); EMN (2024)

³⁰³ CA Survey, Q18 (n=190)

³⁰⁴ CA Survey, Q18 (n=190)

³⁰⁵ The degree of digitalisation derives from the answer to the CA survey, “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.



Source: CA survey

Procedures for **verifying the authenticity of submitted documents** emerge as a major operational concern for CAs, a point consistently highlighted across focus groups and interviews³⁰⁶ Survey results confirm that authenticity checks rely heavily on resource-intensive and often manual verification methods, including:

- **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;³⁰⁷
- 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).

g) 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.

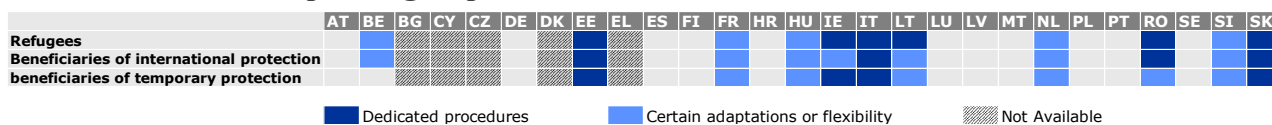
A similar pattern applies to **beneficiaries of international protection**. Dedicated procedures exist in four Member States (EE, IT, RO, SK), while seven others provide targeted adaptations or flexibilities within the general framework (BE, FR, HU, IE, LT, NL, SI). **For beneficiaries of temporary protection**, 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).³⁰⁸

³⁰⁶ 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.

³⁰⁷ Focus Group with CAs from the regulated professions of electricians and crane operators

³⁰⁸ NARIC Survey, Q16 (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).

Figure 3 - Specific procedures or arrangements for the recognition of qualifications and/or validation of skills of specific groups of TCNs across EU MS



Source: NARIC centres survey

h) 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).³⁰⁹ More precisely, information is provided by relevant CAs and Ministries, and in some cases even **ENIC NARIC centres** (as indicated by 18,9% of CAs),³¹⁰ 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%);³¹¹
- **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%);³¹²
- **written guidance or FAQs** in 12 Member States (BE, BG, EE, EL, ES, FI, FR, HU, IE, IT, RO, SI);³¹³
- **targeted webpages for TCNs** in 10 Member States (BE, BG, FI, FR, HU, IT, NL, RO, SE, SK).³¹⁴

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.

³⁰⁹ NARIC Survey, Q19 (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); CA Survey, Q20 (n=190)

³¹⁰ CA Survey, Q20 (n=190)

³¹¹ TCN Survey, Q10 (n=253); NARIC Survey, Q20 (n=18); Answers: dedicated website (to a large extent: 1, to a moderate extent: 3, to a small extent: 8, not at all: 8).

³¹² NARIC Survey, Q20 (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). TCN Survey, Q10 (n=253)

³¹³ NARIC Survey, Q20 (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).

³¹⁴ NARIC Survey, Q20 (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)

Figure 4 - Channels of information provision on recognition procedures to TCNs³¹⁵

	AT	BE	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IE	IT	LT	LU	LV	MT	NL	PL	PT	RO	SE	SI	SK
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																											

not available

Source: NARIC centres and CA survey

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).³¹⁶

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.³¹⁷

b) Qualifications and skills checks within migration pathways

a) 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.

³¹⁵ NARIC Survey, Q20 (n=18); CA Survey, Q20 (n=190)

³¹⁶ NARIC Survey, Q21 (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).

³¹⁷ TCN Survey, Q11 (n=253)

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.

b) 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) , **indirect 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, HU³¹⁸, 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:³¹⁹

- 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.

³¹⁸ 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.

³¹⁹ MA Survey, Q6 (n=48)

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 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 A9.4- 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)³²⁰	• 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) • Eligibility conditions 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)

³²⁰ 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
Skilled technical/VET level routes	8 (BE, CZ, FR, IT, LT, MT, PL, PT)	• Eligibility/documentary requirements within the migration route and employer led suitability screening (i.e. no formal assessment): (BE, CZ, FR, IT, LT, MT, PL, PT) • Skills validation for certain sector-specific labour migration routes (e.g. healthcare sector, tourism): 1 (MT) • Qualification recognition handled outside migration procedures by education/recognition bodies, while permits are processed through migration/labour authorisation chains: 2 (BE, FR)	• In parallel: (BE, CZ, FR, IT, LT, MT, PL, PT)
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)

Migration pathway	Member States in which qualification checks occur	Extent of qualification checks	Timing of qualification checks
Researchers and academia	5 (BE, IE, PL, PT, SK)	• Eligibility/documentary verification (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)	• Role and eligibility based checks (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.³²¹ 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. 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.

³²¹ Migration Partnership Facility. Mapping Labour Migration Pathways in the EU: Austria. Available at: Resources - Migration Partnership Facility; targeted interview with one HR department

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);

c) The regulated/unregulated profession divide

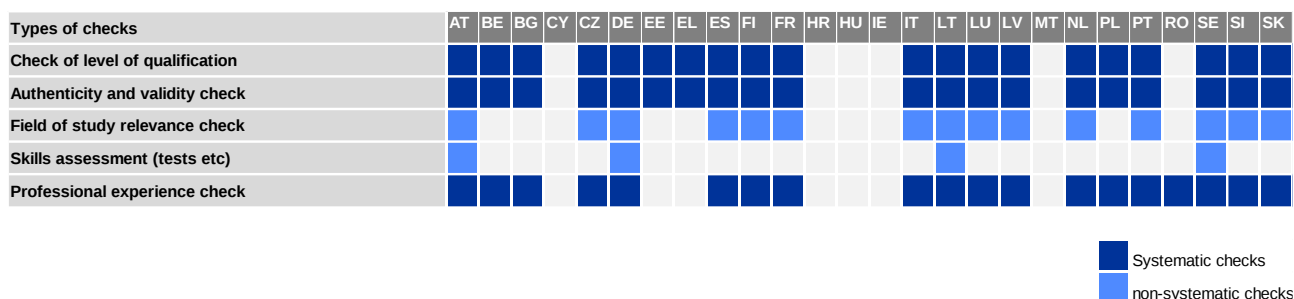
In addition, the **type of profession** also determines the **extent** of qualifications and skills checks of TCNs. Many Member States require more extensive assessments for **regulated professions**, particularly in sectors such as **healthcare**. Indeed, most Member States mandate a **full assessment or equivalence procedure** for regulated professions (AT, CZ, DE, EE, EL, ES, FI, HU, IT, LT, LV, NL, PL, PT, SE, SI, SK).³²² 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).³²³

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 evaluated. Where such assessments do take place, they are generally limited to specific high-skilled migration pathways (see Table A9.4) conducted indirectly through job–qualification alignment, or delegated to employers.

Figure 26 - Criteria assessed for unregulated professions

³²² 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](#); MA Survey, Q8 (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).

³²³ See Table A9.4 for further details on the timing of qualification checks across migration pathways



Source: MS survey

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).³²⁴ 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).

d) Methods, documentation and evidence

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).³²⁵

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).³²⁶ 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).

³²⁴ EMN (2024a); EMN (2024)

³²⁵ MA Survey, Q10 (n=48); EMN (2024); [Migration Partnership Facility. Mapping Labour Migration Pathways in the EU](#).

³²⁶ MA Survey, Q10 (n=48); EMN (2024); [Migration Partnership Facility. Mapping Labour Migration Pathways in the EU](#); targeted interview with one Public Employment Service

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 27 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).³²⁷ 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.³²⁸

Figure 27 - Documentation or evidence typically requested for skills or qualification checks

Documents required for qualification and skills 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
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																										

Source: MA survey

e) 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.

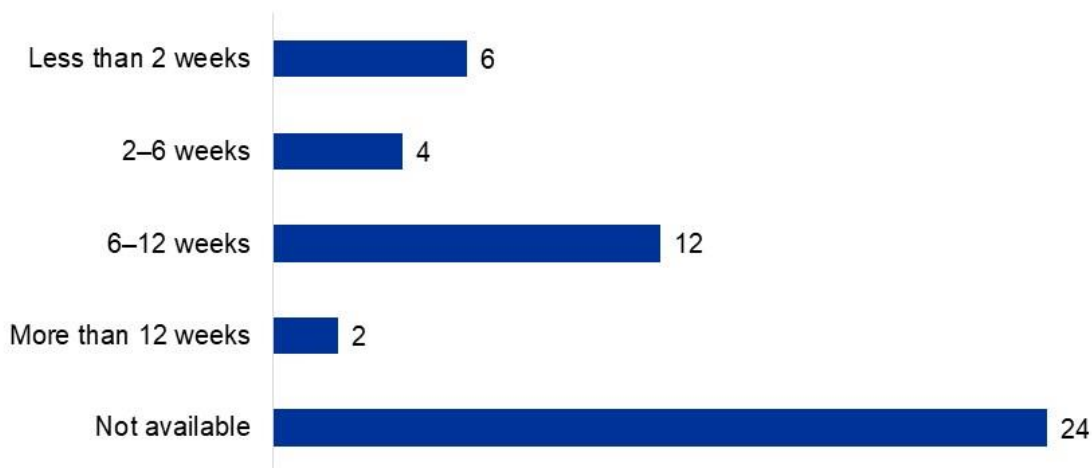
This is further evidenced by the fact that 50% of the migration authorities consulted indicated that the **additional time attributable to such checks is unknown** (AT, CZ, FR, IE, IT, LT, MT, PL, PT, SK, SE).³²⁹

Figure 28 - What is the typical additional processing time attributable to skills or qualification checks?

³²⁷ MA Survey, Q11 (n=48); EMN (2024a); [Migration Partnership Facility. Mapping Labour Migration Pathways in the EU](#)

³²⁸ MA Survey, Q11 (n=48); EMN (2024a); [Migration Partnership Facility. Mapping Labour Migration Pathways in the EU](#)

³²⁹ MA Survey, Q16 (n=48)



Source: MA survey

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).³³⁰ 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).³³¹

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, 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.³³²

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 examples of ICT permits mirror the Blue Card in terms of statutory deadlines (CZ, DE, LU, SK).³³³

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).³³⁴

³³⁰ MA Survey, Q16 (n=48); EMN (2024a); [Migration Partnership Facility. Mapping Labour Migration Pathways in the EU](#)

³³¹ EMN (2024a); [Migration Partnership Facility. Mapping Labour Migration Pathways in the EU](#)

³³² EMN (2024a); [Migration Partnership Facility. Mapping Labour Migration Pathways in the EU](#)

³³³ EMN (2024a); [Migration Partnership Facility. Mapping Labour Migration Pathways in the EU](#); MA Survey, Q16 (n=48)

³³⁴ MA Survey, Q15 (n=48)

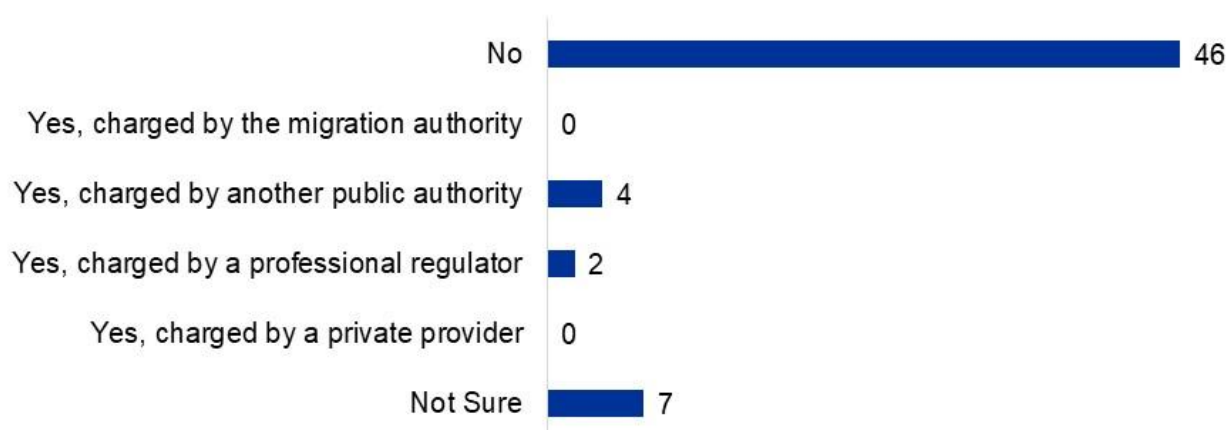
f) Costs and fees

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.³³⁵

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).³³⁶

Figure 29 - Are there specific fees related to skills or qualification checks?



Source: MA survey

³³⁵ MA Survey, Q.17 (n=48)

³³⁶ MA Survey, Q.17 (n=48)

g) 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.³³⁷ 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).³³⁸

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.

c) 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.

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 4.2.

Table A9.5- Estimated financial burden borne by TCNs

³³⁷ Targeted interviews with four CSOs, two IOs and one Focus Group with Individual TCNs

³³⁸ MA Survey, Q12 (n=48)

Burden	Estimated cost
Fees borne by TCNs	1400 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: CAs and TCN survey

On average, a TCN with TCQ coming to the EU will bear costs of around 1400 EUR, calculated as a weighted average across the recognition pathways- (see Annex 4.2), 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 4.2):

- $C = \frac{1400-0}{2500-0} = \frac{1400}{2500} = 0.56$
- $T = \frac{14.2-0}{36-0} = \frac{14.2}{36} = 0.39$
- $RBI = 100 * (0.5 * 0.6 + 0.5 * 0.4)$

The **index yields a value of 47,5** (on a 0–100 scale), indicating a non-negligible burden for applicants, **with financial costs representing a slightly stronger driver of overall burden than duration**.

Table A9.6 – Outcome of the recognition procedures and impact on TCNs ³³⁹

Outcomes	Rate
Recognition outcomes	

³⁰³ TCN survey, Q12 (n=183) for recognition outcomes; TCN survey, Q19 (n=253) for labour market outcome

Outcomes	Rate
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%
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

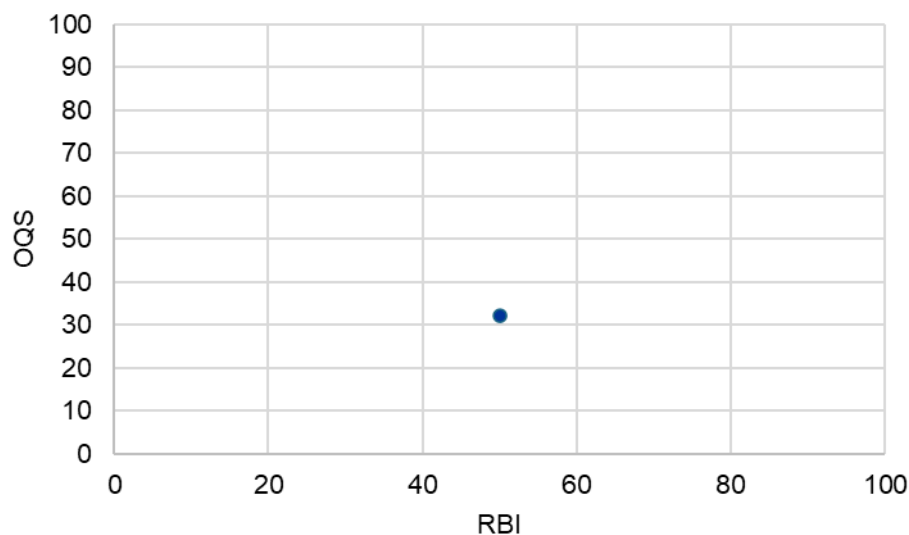
Consequently, each sub-score (i.e the recognition decision score (RDS) and the labour market score (LMS)) is calculated as a weighted average of outcome rates (i.e. $\text{Score} = 100 \times \sum (p_i \cdot w_i)$), considering the share of respondents (p_i) and the assigned weights (w_i). As a result, the **RDS yields to 42,0**, while **the LMS yields to 22,35**.

These subscores 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 weights simply as a 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 a overall **BOEI equal to 0,67**.

Values below 1 suggest that outcomes of recognition processes are weak relatively to the burden faced by TCNs.

Figure 5 - Burden-Outcome efficiency indicator



Source: Supporting study

In the Burden–Outcome plane, the **EU-average point is located in the lower half of the chart, close to the centre and slightly to the left**. This positioning indicates that, while the burden faced by applicants in terms of costs and processing times is not excessive, it remains non-negligible. However, the quality of outcomes, particularly with regard to effective labour market integration, remains limited. Taken together, this pattern suggests that the **level of effort and resources required from applicants is not matched by commensurate benefits**. In other words, non-negligible levels of burden are associated with relatively 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.

d) 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, **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 ranging between 5.8 and

6.1 (approximately six documents per application), and average costs estimated at approximately EUR 1,400. 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.

Appendix A9.1 - Application fees per professional categories across EU Member States³⁴⁰

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 €
HR	Pharmacists	212.36 €

³⁴⁰ CA Survey, Q17 (n=190); EMN (2024)

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		
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		
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 €
SE	Veterinary, construction, education	1,890 SEK

ANNEX 10: VALIDATION OF SKILLS

This annex provides the analytical evidence base for the treatment of validation of skills in this IA. It explains why validation presents a categorically different challenge from the recognition of qualifications, maps the problem through the Driver 1 and Driver 2 framework used in Chapter 2, and sets out why EU-level procedural intervention for validation was considered and discarded (see Annex 7). The EU-level policy and legislative context, including the 2012 Council Recommendation and national legislative frameworks, is set out in Annex 8.

What is validation of skills, and why does it present different challenges from recognition?

Validation of skills concerns the assessment of an individual's ability to apply knowledge and use know-how to complete tasks and solve problems. It is distinct from the recognition of formal qualifications in both its purpose and its form. The 2012 Council Recommendation (see Annex 8.2.3) established a four-stage process — identification, documentation, assessment and certification — applicable across education, training and employment settings. However, unlike recognition, which follows structured, requirements-based procedures leading to a formal decision governed by defined legal frameworks, validation is by nature flexible, local and context-dependent. There is no single methodology, no uniform process, and no comparable formal decision at the end.

Validation is not a direct gateway to employment in the way that recognition of qualifications is. Elements of validation are used by employers for unregulated professions, but these vary widely. Within migration procedures, there is no evidence that validation as defined by the Council Recommendation's four-stage process is systematically undertaken by migration authorities; what occurs is typically a check of evidence of professional experience and a review of CVs and portfolios.

The following table sets out the key structural differences between the two processes and their implications for EU-level policy action.

Table 10.1 — Recognition of qualifications and validation of skills: structural differences

Dimension	Recognition of qualifications	Validation of skills
Governing framework	EU harmonised framework (Directive 2005/36/EC for sectoral and general system professions); national law for TCN	Council Recommendation (2012) — non-binding; no EU-level procedural framework
Process logic	Structured, requirements-based, leading to a formal decision against defined standards	Flexible, locally delivered, purpose-driven; process varies by setting and provider

Dimension	Recognition of qualifications	Validation of skills
Output	Formal recognition decision; may confer access to regulated profession	May lead to a certificate, competence statement or portfolio; not systematically linked to NQFs or formal credentials
Availability	Available in principle to all applicants in all MS for regulated professions	Not systematically available — for EU citizens or TCN; depends on national/local provision
Institutional responsibility	ENIC-NARIC centres and CA for regulated professions	Mix of PES, education providers, third-sector bodies, employers; no designated authority
Link to migration procedures	Recognition outcomes may directly determine visa/permit eligibility	Skills checks in migration procedures are informal and not equivalent to the four-stage validation process
Scope for EU procedural rules	EU competence established; precedent in PQD	Binding procedural rules would risk creating entitlements not available to EU citizens; see Annex 7

These structural differences have direct implications for how validation can be addressed by EU-level policy action. While recognition procedures share a comparable logic across MS — assessing qualifications against defined standards and arriving at a formal decision — validation does not. Any attempt to impose common procedural rules on validation would either require a degree of harmonisation that fundamentally conflicts with the nature of validation, or would produce rules too general to have practical effect. The full analysis of why common procedural rules for validation were discarded as a policy option is set out in Annex 7.

1.1. Problem Driver 1: Diverging recognition systems within and between MS

The institutional framework for validation across MS is highly fragmented, involving a mix of public and private bodies with diverse roles, methodologies and legal mandates. Most countries lack robust coordination mechanisms between the different actors involved in validation, and Cedefop inventory reports consistently emphasise the need for better sector-wide collaboration.

This section maps fragmentation across the three sub-dimensions that parallel Driver 1 in the problem analysis in Chapter 2.

(a) Divergence of validation systems across MS

While some form of validation arrangement exists in almost all EU MS (see the national legislative overview in Table 8.1 of Annex 8), these systems differ significantly in scope, coverage, governance and accessibility when assessed specifically in relation to migrants and refugees. The Cedefop European Inventory on Validation (2023 update) identifies three tiers of provision.

Cedefop 2023 Inventory: three-tier typology for migrants and refugees Tier 1 — Systematic arrangements: AT, BE-FL, DK, DE, FI, NL, SE — dedicated validation measures for migrants and refugees embedded in national systems or legislation. Tier 2 — Project-based initiatives: GR, IT — targeted projects supported by EU or national funding, not embedded in statutory frameworks. Tier 3 — General access only: all remaining MS — general validation systems open in principle to TCN but without dedicated outreach, adapted tools or specific measures.

Even among MS with systematic arrangements, the character varies substantially. In **Sweden**, the validation system has a strong labour market orientation: since 2017, more than 35,000 qualification certificates have been issued for non-formal qualifications (over 8,000 in the most recent year), with the system used explicitly for newly arrived migrants through PES mapping of skills and competences. In **Denmark**, the Realkompetencevurdering (RKV) system is legally embedded; the Integration Act creates a statutory duty to conduct competence assessment as part of individual integration plans. In **Germany**, validation attention was comparatively high during the large refugee influx of the previous decade, but policy progress since 2018 has largely remained at the project level — for example, the prolongation of the Valikom project to 2024 and the launch of NetQA as its successor. In **Austria**, three AMIF-funded project-based initiatives have supported displaced Ukrainians, including the Femme! Empower, Employ, Emulate Me programme operated by Diakonie de La Tour.

Table 10.2 — National validation arrangements for migrants and refugees: Member State overview³⁴¹

³⁴¹ Cedefop (2023)

Member State	Key validation arrangements and initiatives for migrants / refugees
Austria	AMS competence checks for asylum seekers (piloted 2015, expanded to regular offer). KomIn (Kompetenzorientierte Intensivberatung) via PES. KomIn Modul Ukraine for displaced persons. AMIF-funded Femme! programme. Featured in Basna (2024).
Belgium (Flanders)	EVC (Erkenning van Verworven Competenties) system open to all including migrants. VDAB includes newly arrived migrants in competence assessment trajectories. 52% of Ukrainian refugees registered at PES recorded as tertiary educated. Migrants explicitly included as target group (Cedefop 2023).
Denmark	RKV legally embedded; Integration Act creates statutory duty for skills and competence assessment as part of individual integration plans. Legislation strengthened for Ukrainian refugees. Cedefop 2023: systematic arrangements confirmed.
Finland	TE Services uses systematic competence identification for migrants. Dedicated Working Group on Identification of Competences (since 2021). Cooperation with Philippines via ILO facilitation for employer-led skills assessment. Featured in Basna (2024).
Germany	Valikom project (prolonged to 2024) and NetQA successor. Check.work in Bavaria. Progress since 2018 primarily project-level. 72% of Ukrainian refugees have university degree. Featured in Basna (2024).
Ireland	VISKA ERASMUS+ project (2017–2020): field trial of EU Skills Profile Tool with 32 learners including migrants and refugees. QQI RPL framework open to all. 62% of Ukrainian refugees at PES events with EQF 6+ qualifications. Featured in Basna (2024).
Italy	EU Skills Profile Tool widely used (most reported country). ESPoR project: trial of Bilancio di competenze skills audit model for migrants. Piedmont Region provincial pilot on skills validation.

Member State	Key validation arrangements and initiatives for migrants / refugees
	NARIC centre proactive on skills validation. Key national partner in Cedefop Greece–Portugal pilot.
Netherlands	Skills-recognition system for jobseekers linking skills transparently to labour market occupations. Refugees, unskilled and low-skilled can access skills recognition through local or national initiatives. NARIC centre launched pilot on skills validation. Cedefop 2023: systematic arrangements confirmed.
Portugal	RVCC (Recognition, Validation and Certification of Competences) system open to all. Language barriers (PLA pathway used). Receiving country in Cedefop–Greece intra-EU skills-based mobility pilot.
Romania	Featured in Basna (2024) on Ukrainian refugees. National Training Strategy under development (2023). General validation system with specific documented measures for Ukrainian refugees.
Spain	Royal Decree 1224/2009: skills audits open to unemployed individuals, migrants and refugees who have regularised their situation. Conducted by national or regional authorities against National Catalogue of Competences. Six-month limit to request a skills audit.
Sweden	Strong labour market orientation. Since 2017: 35,000+ qualification certificates for non-formal qualifications (8,000+ in most recent year). Explicit use for newly arrived migrants through PES mapping. Cedefop 2023: systematic arrangements confirmed.
Greece	Cedefop pilot project (2021): intra-EU skills-based mobility of adult refugees (sending country). Skills profiles of 70+ refugees shared with Portuguese employers; 90+ enterprises contacted. Primarily project-based.

Member State	Key validation arrangements and initiatives for migrants / refugees
France	VAE system recently reformed (Law 2022-1598): simplification, individualised support, national digital platform. EU Skills Profile Tool reported as not widely used. Featured in Basna (2024).
BG, HR, CY, CZ, EE, HU, LV, LT, LU, MT, PL, SK, SI	General open-access systems in principle available to all citizens including TCN. No dedicated measures for migrants or refugees identified in the 2023 Cedefop Inventory. Language barriers particularly acute (CZ: statutory national-language requirement). Bulgaria: documented VET integration response to Ukrainian refugees. Poland: large host country (1.6M+ Ukrainian refugees) but validation measures remain general.

(b) Inconsistencies and duplications within MS

Fragmentation is compounded by inconsistency within MS, where responsibilities are divided across regions, sectors and individual employers with limited coordination. Competences are scattered across migration authorities, PES, education providers and CA for regulated professions, without a unified framework.

The interaction between validation and migration procedures is a particularly acute source of within-country inconsistency. Among migration authorities surveyed: **60.4% reported systematically conducting skills and qualification checks** as part of labour migration procedures (AT, BE, CZ, FR, HU, IE, LT, NL, PL, PT); a further 18.8% conduct such checks only occasionally (BG, LT, PL, PT); and 20.8% conduct no checks at all (HU, IT, LT, MT, PL, SK, SE). However, these migration authority checks are rarely carried over into recognition procedures: only **11% of CA** surveyed take them into account in all cases; 5.5% do so occasionally; and 24.9% do not do so at all. In several MS (AT, FR, LT, NL, PL, PT, RO), some CA consistently rely on prior skills checks while others do so only sporadically — a divergence within the same national system.

Processing times for migration authority skills checks range from less than two weeks (BE, PT) to more than twelve weeks (HU, PL). Methods also differ widely, with most authorities relying on employers to conduct or verify checks (BE, HU, IE, LT, PL, PT). The result is a **self-reinforcing cycle of low visibility and limited uptake**: awareness of validation mechanisms remains low; the process is perceived as yielding few tangible benefits; demand is weak; and the administrative and operational costs of maintaining validation systems lead smaller providers to withdraw, further reducing access.

(c) Lack of accessible information on validation for TCN and employers

The institutional separation between bodies responsible for recognition (ENIC-NARIC centres, CAs) and those responsible for validation (PES, education providers, third-sector bodies) creates an information landscape that is difficult to navigate. **None of the 18 ENIC-NARIC centres** responding to the study survey (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, and ENIC-NARIC centres do not consider themselves responsible for validation. CA similarly do not engage in formal validation: skills tests or professional assessment are used for TCN applications in only **10.5% of CA surveyed** (AT, DE, LV, MT, PL, SE), and only where documentation is incomplete.

For employers, the absence of a trusted, standardised validation outcome reduces the utility of any validation that does occur. Large companies have developed employer-driven assessment models — deploying HR staff in third countries or engaging certified recruitment partners — but SMEs generally lack the capacity to do so, increasing dependence on intermediaries and raising recruitment costs. Where validation outcomes are not systematically visible or trusted, the process does not function as an effective signal of skills for employment purposes.

1.2. Driver 2: The distinct character of administrative complexity in validation

The administrative complexity experienced by TCN in connection with validation differs fundamentally in character from the complexity documented for recognition procedures. For recognition, complexity arises from the bureaucratic, documentary and temporal dimensions of a formal procedure that exists, is legally required, and determines formal access to a profession. For validation, the primary challenge is not the complexity of a burdensome procedure but the **absence of any consistent procedure at all**: validation mechanisms are either unavailable, unknown, or perceived as lacking practical value.

(a) The absence of standard procedures, timelines and costs

Unlike recognition, where procedural steps are at least nationally foreseeable, validation has no comparable procedural architecture. The 2023 Cedefop Inventory confirms that while validation initiatives have grown in the labour market between 2018 and 2023, these remain fragmented, often temporary and frequently employer-led rather than authority-based. Even the narrowest form of procedural validation — a skills check within a migration admission procedure — shows no common logic: processing times range from less than two weeks to more than twelve weeks, and methods include employer verification, document review and portfolio assessment.

In approximately **45% of existing validation arrangements** across MS, validation can provide access to the labour market by resulting in a qualification that is compulsory for a specific job. This means that in the majority of arrangements, the output has no direct labour market access function — reinforcing that validation is used primarily as a route to a formal qualification rather than as a mechanism to give independent visibility to skills.

(b) Employer-led validation as the de facto system — and its limitations

In practice, the validation of skills for TCN currently relies almost entirely on individual employers. Large companies assess and validate skills directly in third countries through dedicated HR staff or certified recruitment partners: Finland has developed cooperation arrangements with the Philippines, with the ILO acting as a facilitator. However, SMEs generally lack the capacity for direct overseas assessment and must rely on intermediaries, increasing both recruitment costs and the risk of irregular recruitment practices. Outcomes of employer-led assessment are also not portable: an assessment conducted for one employer carries no weight with another, creating duplication and further discouraging investment in validation.

The self-reinforcing cycle — limited demand, high operational costs, reduced provision, further reduced visibility — operates most acutely here, where SMEs face the sharpest asymmetry between the cost of assessment and the perceived benefit. This is structurally distinct from the cost asymmetry in recognition: in recognition, the cost is real and borne by the applicant with a predictable outcome; in validation, the cost is real but the outcome is not reliably usable, making the investment calculus unfavourable for both employers and TCN.

1.3. Driver 3 — not applicable to validation

Driver 3 (lack of trust in and understanding of qualifications and skills obtained in third countries) is not applied to the analysis of validation challenges. The trust and knowledge deficit documented for recognition arises in the context of a formal assessment process where an authority must make a consequential legal decision on the basis of foreign documentary evidence. The institutional framing and decisional logic make trust in the underlying qualification system directly material.

For validation, this trust dimension does not arise in the same way. Validation is precisely the mechanism designed to make skills visible without reliance on formal documentary evidence of qualifications. The challenge for TCN validation is not that authorities distrust the skills claimed, but that no systematic framework exists to assess and certify those skills in a way that is trusted by labour market actors. The trust problem for validation is one of outcome credibility, not of qualification authenticity and it is not amenable to the same policy responses (EU-level authenticity check services, interoperable qualification databases) proposed under Driver 3 of the main IA.

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ANNEX 11: DIVERGING TERRITORIAL IMPACT OF POLICY OPTIONS

While the action aims to facilitate the recognition of qualifications for TCN to address EU labour and skills shortages across the Single Market, implementation costs and socio-economic benefits will not be distributed equally across Member States. The territorial variation in impact is driven by the interplay of five main determinants:

- **Volume of inbound migration applications involving an element of qualification recognition and the type of qualification assessment involved:** The total number of TCN applications determine the baseline workload that will be affected by the introduction of common rules at EU level. The choice between the pathways (e.g. EU Blue Cards, Single Permits, etc.) also has an impact on the administrative workload, as the type and extent of qualification checks vary across these migration tracks.
- **Scale, density and fragmentation of the professional regulation landscape:** the proportion of the labour force working within regulated professions, the complexity of the regulations governing those professions and the number of authorities involved determine the volume of recognition applications for access to regulated professions, the complexity of the assessment of the qualifications submitted and of their administrative processing.
- **Existing coordination and between systems:** the existing structural alignment—or lack thereof—between national migration authorities (managing residence and work permits), competent authorities (recognising qualifications to access regulated professions) and other recognition bodies determines the effort required to move to integrated processing of qualification recognition requests.
- **Procedural distance to the common EU minimum rules:** The operational "distance" between current national practices and the proposed EU framework determines the “per procedure” compliance cost.

Volume and type of inbound migration applications involving an element of qualification recognition

The volume of migration applications to the Member States involving an element of qualification recognition is distributed unequally across the EU. This is evidenced by the highly skewed distribution of European Bluecard applications which show that DE alone consistently processes the vast majority of all EU Blue Cards (over 56,000 out of a total of approximately 78,000 in 2024). Other major users of the system trail significantly behind (PL: +/-5,800; HU: +/- 2,900; FR: +/- 2,700) while still others (EE, EL, CY, PT, SK, SE) only process less than 100 applications per year. Other proxy indicators confirm the highly unequal distribution. For example, out of the 1.1 million first-residence permit applications for employment reasons submitted in the EU in 2024, PL processed over 330,000, ES more than 95,000, HR over 85,000 and DE over 77,000. Together, these four Member States alone absorb nearly 55% of the total employment-related permit inflow across the entire European Union, highlighting the strong territorial concentration of this type of legal migration pathways.

The type of legal migration pathways offered also matters as the extent of qualification checks vary across migration tracks. As the EU Blue Card targets highly qualified workers and mandates a pre-entry verification of higher education degrees or equivalent professional experience, Member States

that heavily use this track face a front-loaded administrative workload where migration offices are highly dependent on rapid, specialized verification support to avoid severe bottlenecks before a permit can even be issued. In the Single Permit track, by contrast, qualification checks are highly variable and often decentralised. For non-regulated professions, some Member States bypass qualification checks entirely, leaving vetting to the employer. However, for regulated professions within the Single Permit track, a complex, multi-step workflow is often triggered whereby the application cannot progress until a separate, external professional body or ministry formally recognizes the qualification, leading to a fragmented, sequential process with multiple administrative touchpoints. Several Member States (such as the Netherlands with its Kennismigrant scheme) use fast-track national pathways whereby recognized or trusted employers assume the legal responsibility for vetting the applicant's qualifications.

Depending on the policy option considered, cost impacts, compliance costs and economic and social benefits would vary between these different types of MS.

For the high-volume Blue Card hubs, PO 1's non-binding measures would entail low compliance costs but would fail to remedy the processing bottlenecks currently delaying talent entry. Similarly, for Member States heavily reliant on national pathways or the Single Permit, non-binding guidelines would offer maximum procedural flexibility, requiring minimal adaptation costs; however, they would generate virtually no economic or social benefits, as the fundamental structural fragmentation and sequential delays hindering labour market integration would remain unaddressed.

Under PO 2, for the high-volume Blue Card hubs, the introduction of strict deadlines and centralized verification standards will require operational adjustments and investment in staff training. However, these compliance costs will be outweighed by significant economic benefits, as resolving systemic bottlenecks will accelerate the integration of highly qualified talent into their labour markets. For the high-inflow single permit and mass-employment destinations, PO 2 will generate significant compliance and adaptation costs to align their currently fragmented, sequential workflows. Nevertheless, these jurisdictions will accrue significant benefits through reduced administrative duplication and faster processing times. Conversely, for low-volume and specialized jurisdictions, the operational adaptation costs will remain structurally minor due to their low baseline application numbers, though the relative economic upside will also be far more localized. The operational and compliance costs under PO 2 will also depend on the maturity of each Member State's national digital infrastructure and the specific integration effort required to connect with the interoperable database on the comparability of third-country qualifications. For the high-inflow MS, the technical integration costs will be minor relative to their existing scale, while the economic benefits will be considerable, maximizing returns by accelerating the vetting of the large influx of highly qualified talent they attract. Conversely, for low-inflow MS the adaptation costs will be relatively higher compared to the expected benefits.

Under PO 3, which builds directly upon the binding minimum procedural requirements of PO 2, the incremental adaptation costs are expected to remain limited, as Member States will continue applying standard procedures to the vast majority of recognition applications. However, jurisdictions will be required to establish technical links to a public register of approved third-country learning

programmes and its supporting digital infrastructure. The additional costs this would entail will also depend on the digital maturity of the national administrative systems, but they should be comparably small once the link with the interoperable database on the comparability of third-country qualifications is established.

Scale and density of the professional regulation landscape

The scale and density of the professional regulation landscape across Member States acts as a direct multiplier of administrative complexity and application volume. The proportion of the total domestic labour force working within legally regulated professions varies across the EU, ranging from under 15% in some jurisdictions to over 33% in others.¹

Beyond the absolute share of the regulated workforce, the complexity of the applicable regulations and the number and type of competent authorities involved determines how qualification assessments are executed. In more centralized governance models, qualification recognition and credential evaluations are concentrated within a limited number of national entities or a unified ENIC-NARIC centre. In contrast, decentralized systems distribute this competence across different actors (e.g. regional actors, sector-specific competent authorities, such as regional medical chambers, professional orders, or distinct line ministries).

Depending on the policy option considered, cost impacts, compliance costs, and economic and social benefits vary between these different types of MS:

Under PO 1, non-binding measures and guidelines regarding professional regulation leave existing national architectures and procedures intact, entailing low compliance and adaptation costs. However, this lack of binding force also entails that structural change depends on national take-up. This limits extent to which it can be expected to fully eliminate the structural bottlenecks, lack of internal uniform standards, and complexity that TCN applicants face when navigating disparate regional competent authorities remain unchanged. As a result, the socio-economic benefits it would yield are also expected to remain more limited.

Under PO 2 and PO3, the introduction of binding minimum procedural requirements, strict deadlines, and mandatory processing standards triggers divergent adaptation costs. For highly regulated or decentralized systems, both PO 2 and PO3 generates substantial front-loaded compliance costs. These Member States will need to undertake horizontal coordination between migration and other authorities, legal adjustments, and staff training to align the competent authorities' practices with common EU deadlines. However, the long-term economic and social benefits for these jurisdictions are also considerable as harmonized procedures across a considerable share of the labour force improves labour market efficiencies and accelerates the integration of professionals into acute shortage sectors. For more centralized frameworks or less regulated systems, compliance costs are low because changes can be implemented from the top down through a few central entities, allowing them to capture the economic benefits of faster talent integration with minimal upfront friction.

Under PO 2 and PO3 impacts also depend on how data-ready each regulatory system is. For more centralized systems technical integration costs are expected to be lower, as they will have to build less connections to the EU database, quickly maximizing the economic benefits of automated comparability checks. For decentralized systems the adaptation cost is determined by whether they choose to route the digital infrastructure through a centralized national gateway or connect separate regional competent authorities. If effectively integrated, however, the economic benefits for these dense regulatory landscapes are clear, as automated verification tools reduce the "per procedure" compliance cost and alleviate the manual vetting burden currently handled by regional boards.

Existing coordination and between systems

The structural alignment—or lack thereof—between national migration authorities, competent authorities for professional recognition and other recognition bodies (such as ENIC-NARIC, universities etc.) determines the operational friction involved in processing third-country qualification recognition requests. Across the Union, the degree of institutional interconnectedness between these types of entities varies considerably. Depending on the level of coordination between the entities involved the cost impacts, compliance costs, and economic and social benefits of the various options can vary significantly.

Depending on the policy option considered, cost impacts, compliance costs, and economic and social benefits vary between these different types of MS:

Under PO 1, non-binding recommendations and exchange of best practices regarding inter-agency cooperation will lead to minimal adaptation costs in most cases. However, this option can not be expected to generate considerable economic or social benefits as siloed administrations and sequential recognition tracks are unlikely to undergo voluntary structural overhauls, leaving the resulting delays and administrative friction largely unaddressed.

Under PO 2 and PO 3, the introduction of binding minimum procedural requirements and synchronized timelines will impose operational realignment. For siloed administrations, compliance costs will be higher, as they must build new administrative interfaces, protocols, or single-entry points to ensure migration and recognition procedures can run in parallel. Technical onboarding costs will depend on whether the EU interoperable database can be plugged into a single shared gateway or if separate connections must be established for both the migration offices and the individual competent authorities. Nevertheless, the benefits for these jurisdictions will be substantial as automated database checks can bridge the institutional gaps, minimizing manual verification requests between detached entities. Importantly, minimising the impact of sequential processing by imposing the “once-only”-principle will also facilitate the entry of qualified TCNs into the labour market.

Procedural distance to the common EU-rules

The operational "distance" between current national practices and the proposed EU framework is an important driver of the "per procedure" compliance cost for Member States. Across the EU, all the

data available point towards considerable divergence regarding baseline performance metrics, processing timelines, standard fees, and documentation requirements.

Depending on the policy option considered, cost impacts, compliance costs, and economic and social benefits vary between these different types of MS:

- Under PO 1, non-binding guidelines and procedural benchmarks would have only a limited impact on existing national practices, resulting in low adaptation costs but also more limited socio-economic benefits. Those MS that currently have lengthy, mostly paper-heavy recognition procedures, often accompanied by substantial procedural fees would face minimal immediate adaptation costs, but they would also miss out on the long-term cost savings and efficiency gains that come with digital modernization. For agile administrations, PO 1 represents the baseline status quo and brings no noticeable change.
- Under PO 2 and PO 3, the introduction of binding procedural rules, maximum fee caps, and strict processing deadlines triggers a substantial compliance shock for high-barrier and rigid jurisdictions. These Member States will face high adaptation costs to legally compress their multi-year timelines down to the mandated EU caps, adjust their fee structures, and re-engineer workflows to handle incomplete applications flexibly. Nevertheless, the long-term socio-economic benefits will be highly concentrated in these jurisdictions, as removing these steep procedural hurdles will significantly unlock untapped talent pools. For agile administrations, adaptation costs will be negligible, as their current processing times and fee structures are already near or below the proposed EU thresholds. Nevertheless, even the best performing MS in terms of administrative efficiency stand to gain indirectly from a transparent and agile common EU framework as it helps to improve the attractiveness of the Single Market as a destination for talent in the global economy and enhances collective resilience against shared labour shortages.

ANNEX 12: POLICY OPTIONS: DESCRIPTION OF MEASURES

Driver / Objective	POLICY OPTION 1	POLICY OPTION 2	POLICY OPTION 3
	Soft measures to enhance recognition procedures for TCN qualifications (voluntary — B measures)	Common measures to streamline procedures (binding — A measures)	Includes PO2 + automatic recognition for selected professions (binding)
SO1 — Streamline recognition systems within and between MS			
1.1 Different recognition procedures for the same qualifications across MS			

Driver / Objective	POLICY OPTION 1	POLICY OPTION 2	POLICY OPTION 3
	B1. Guidelines on minimum training requirements for sectoral professions The Commission develops common guidance for MS on recognising TCN qualifications in the seven sectoral professions covered by the PQD, drawing on the minimum training requirements established therein. + B2. Common guidelines, templates and checklists for recognition procedures The Commission develops voluntary templates and checklists to support consistency in administrative practice across MS, covering how CA structure and communicate procedural requirements, documents, timelines, and appeal rights. Compliance is promoted through transparency and benchmarking via the Group of Coordinators (GoC).	A1. Common rules for recognition procedures A binding framework establishes common rules that national CA must follow when assessing TCN qualifications, including a defined minimum set of document types that may be required, acceptance of digital copies alongside originals, and reduction or elimination of mandatory certified translation requirements.	A1. Common rules for recognition procedures Includes PO2. + A12. EU framework for automatic recognition of selected TCN qualifications An EU framework for automatic recognition of TCN qualifications in the seven sectoral professions covered by the PQD (doctors, nurses, dental practitioners, veterinary surgeons, midwives, pharmacists and architects), based on prior verification of third-country learning programmes against EU minimum training requirements. Programmes meeting the standards are listed in the public EU register established under A11; where a qualification is obtained from a listed programme, CA grant recognition without a full case-by-case assessment.
1.2 Duplication and inconsistencies of procedures within MS			

Driver / Objective	POLICY OPTION 1	POLICY OPTION 2	POLICY OPTION 3
	Soft measures to enhance recognition procedures for TCN qualifications (voluntary — B measures) B3. Best practices on streamlined and consistent recognition procedures <i>The Commission identifies and disseminates national best practices on streamlined, consistent recognition procedures across and within national systems, including through GoC meetings and structured mutual learning activities.</i>	Common measures to streamline procedures (binding — A measures) A2. Rules to coordinate national recognition systems and prevent duplication <i>MS are required to coordinate national recognition systems and prevent overlap between procedures for access to regulated professions and those embedded in labour migration processes. Where a Member State has previously conducted a favourable qualification assessment during a migration procedure, further in-depth reassessment is not required.</i>	Includes PO2 + automatic recognition for selected professions (binding) A2. Rules to coordinate national recognition systems and prevent duplication <i>Includes PO2.</i>
1.3 Lack of clear and accessible information for TCN and employers			

Driver / Objective	POLICY OPTION 1	POLICY OPTION 2	POLICY OPTION 3
	Soft measures to enhance recognition procedures for TCN qualifications (voluntary — B measures) B4. Improved EU-level information provision for TCN and employers <i>The Commission issues guidance on how national authorities should present recognition information in a user-friendly format. Harmonised layout and navigation standards are promoted through Commission expert groups. Comparative studies and peer learning further support evidence-based alignment of information practices.</i>	Common measures to streamline procedures (binding — A measures) A3. Minimum mandatory information requirements <i>MS are required to provide TCN with comprehensive, up-to-date and user-friendly information on the applicable recognition systems, required documentation, timelines, fees, compensation measures, appeal rights, and tailored information, assistance and support services for refugees.</i>	Includes PO2 + automatic recognition for selected professions (binding) A3. Minimum mandatory information requirements <i>Includes PO2.</i> + A11. Public EU register of third-country learning programmes eligible for automatic recognition <i>The Commission creates and maintains a publicly accessible EU register of third-country learning programmes that have been verified against EU minimum training requirements, including information on how they compare to EU standards. The register provides ex-ante predictability for applicants and employers and serves as the foundational reference for the automatic recognition channel under A12.</i>
SO2 — Reduce legal and administrative complexity for recognition procedures			
2.1 Lengthy and untransparent processes with unclear deadlines			

Driver / Objective	POLICY OPTION 1 Soft measures to enhance recognition procedures for TCN qualifications (voluntary — B measures)	POLICY OPTION 2 Common measures to streamline procedures (binding — A measures)	POLICY OPTION 3 Includes PO2 + automatic recognition for selected professions (binding)
	B5. EU-level common guidance on procedural steps and indicative timelines <i>The Commission develops voluntary guidance defining the key steps in recognition procedures and indicative maximum processing timelines, providing a common reference point that MS are encouraged to adopt and that increases predictability for applicants and employers.</i>	A4. Binding procedural guarantees including deadlines and right of appeal <i>CA must acknowledge receipt of applications within one month and inform applicants of any missing documents. A substantiated decision must be issued within three to four months of receipt of the complete file. Applicants have an enforceable right of appeal against decisions.</i>	A4. Binding procedural guarantees including deadlines and right of appeal <i>Includes PO2.</i> + A12. EU framework for automatic recognition (see SO1.1) <i>Automatic recognition eliminates the case-by-case assessment stage for applicants from programmes listed in the A11 register, reducing the recognition waiting period from approximately 14 months at baseline to approximately 3 months.</i>
2.2 Burdensome documentation and translation requirements			

Driver / Objective	POLICY OPTION 1	POLICY OPTION 2	POLICY OPTION 3
	B6. Recommendations on proportionate documentation and translation requirements <i>The Commission issues a recommendation — modelled on the Code of Conduct available for the PQD — setting out clear principles and examples for proportionate documentation, translation and certification requirements, distinguishing essential from non-essential documents.</i>	A5. Common set and maximum number of documents that may be required <i>MS may only require a defined maximum set of documents (diplomas and certificates, academic transcripts, CVs and proof of professional experience, and licences or registration from the country of origin). Requirements beyond this set are prohibited.</i> + A6. Obligation to accept documents in more than one language <i>MS must accept documents provided by TCN applicants in any EU official language, including at least one language frequently used by migrants, reducing certified translation requirements.</i>	A5. Common set and maximum number of documents <i>Includes PO2.</i> + A6. Obligation to accept documents in multiple languages <i>Includes PO2.</i>
2.3 High and unclear costs			

Driver / Objective	POLICY OPTION 1	POLICY OPTION 2	POLICY OPTION 3
	Soft measures to enhance recognition procedures for TCN qualifications (voluntary — B measures) B7. Guidelines to determine reasonable fees for recognition procedures <i>The Commission provides an EU methodology and calculation formula for determining proportionate fees for recognition procedures, setting out permissible cost components and examples of compliant fee structures. MS use the guidelines to review or adjust national fee-setting methods.</i>	Common measures to streamline procedures (binding — A measures) A7. Common rules on maximum fees for recognition applications <i>MS may only charge fees that do not exceed the actual cost of the recognition service provided. Application fees and fees for compensation measures must be transparent and fully justified; where fees can be eliminated, MS are required to do so.</i>	Includes PO2 + automatic recognition for selected professions (binding) A7. Common rules on maximum fees <i>Includes PO2.</i>
SO3 — Increase trust and understanding of qualifications obtained in third countries			
3.1 Concerns over authenticity of documents issued in third countries			

Driver / Objective	POLICY OPTION 1	POLICY OPTION 2	POLICY OPTION 3
	Soft measures to enhance recognition procedures for TCN qualifications (voluntary — B measures) B8. Support for fraud and authenticity verification tools <i>The Commission develops and pilots an EU-supported AI-assisted tool that guides CA through reference sources for the verification of issuing institutions and documents. The pilot is implemented with volunteering MS and professions, generating a common model that MS may adopt or adapt. Fraud and authenticity checklists complement the AI tool.</i>	Common measures to streamline procedures (binding — A measures) A8. EU-level service for authenticity checks on TCQ documents <i>An EU-level service is established to carry out authenticity checks on evidence of formal qualifications issued in third countries, supporting Member State authorities in their assessment procedures. Where doubts arise over the authenticity of documents, the service provides a rapid and reliable check, drawing on digital tools and reference sources such as the FRAUDOC guidelines on diploma mills and document fraud.</i>	Includes PO2 + automatic recognition for selected professions (binding) A9. Interoperable national databases on comparability of TCN qualifications <i>Includes PO2.</i> + A13. Verifiable digital credentials required for automatic recognition <i>A legal obligation requires third-country education and training institutions listed in the A11 register to issue qualifications as verifiable digital credentials. Credentials must be verifiable, trusted and interoperable across MS, in compliance with common EU technical specifications and trust framework, ensuring compatibility with EU digital identity and data exchange infrastructures.</i> + A8. EU-level service for authenticity checks on TCQ documents <i>Includes PO2</i>
3.2 Insufficient knowledge about third-country educational systems, curricula and standards			

Driver / Objective	POLICY OPTION 1	POLICY OPTION 2	POLICY OPTION 3
	B9. Comparisons of TCN qualification frameworks with the EQF and peer learning via GoC <i>The Commission develops and updates the methodology for comparing TCQ frameworks with the EQF, with the EQF Advisory Group supporting peer reviews. Structured information exchanges are fostered via the GoC, including dedicated sessions to present and discuss recognition outcomes for the same qualifications across MS.</i>	A9. Interoperable national databases on comparability of TCN qualifications <i>MS are required to develop interoperable national databases on the comparability of TCQ, with the possibility to issue comparability statements. These databases facilitate sharing of recognition decisions and expertise on TCQ across MS, feeding into an EU-level database maintained by the Commission (in line with initiatives such as the Erasmus+ Q-entry project).</i>	A11. Public EU register of third-country learning programmes (see SO1.3) <i>The EU register of verified third-country learning programmes serves as the primary reference tool for understanding whether third-country programmes meet EU minimum training requirements, reducing informational barriers for CA assessing TCN qualifications.</i>
3.3 Doubts about the efficacy of quality assurance within third-country systems			

Driver / Objective	POLICY OPTION 1	POLICY OPTION 2	POLICY OPTION 3
	B10. Support for transparency and comparability of quality assurance in third-country qualification systems <i>The Commission supports and steers further analytical work, building on existing mapping of TCQ frameworks, analysis of learning outcomes, and assessment of quality assurance arrangements, to improve the transparency, comparability and usability of TCQ for recognition purposes. Complementary comparative studies support evidence-based alignment.</i>	A10. Compensation measures where justified doubts exist on quality assurance <i>MS may apply compensation measures — such as an aptitude test or adaptation period — where there are justified doubts about the quality of the education and qualification system under which a formal qualification was awarded. The decision to impose compensation measures must be taken as quickly as possible and no later than one month after the applicant requests recognition, with full procedural guarantees applying throughout.</i>	A10. Compensation measures where justified doubts exist on quality assurance <i>Includes PO2.</i> + A12. EU framework for automatic recognition (see SO1.1) <i>Prior verification of third-country learning programmes against EU quality and training standards — conducted by designated EU-based quality assurance agencies using multidisciplinary expert teams and on-site visits — provides the structural quality assurance foundation for the automatic recognition channel, replacing repeated case-by-case doubt assessments with a systematic, time-limited programme approval process.</i>

ANNEX 13: COMBINED COSTS AND BENEFITS OF SPI PREFERRED OPTIONS UNDER ACTION 1, 2, AND 3

When combined, the preferred options under Actions 1, 2 and 3 are expected to generate substantial administrative cost savings and broader economic and social benefits by improving the transparency, comparability, portability and recognition of qualifications and skills across the EU labour market.

As explained in more detail in the dedicated impact assessments, the three Actions address different aspects of the same underlying problem: difficulties in presenting, verifying and recognising qualifications and skills across borders. Action 1 focuses on ensuring that labour market actors in the EU have access to simplified, effective, digital and cost-efficient ways to carry, prove, read, understand and compare qualifications and skills obtained in another MS, Action 2 on the cross-border recognition of qualifications required to access regulated professions, and Action 3 on the recognition of qualifications of third-country nationals.

The combined effect of the SPI is to reduce information asymmetries, administrative burden and recognition delays across borders supporting the creation of a genuine Single Market for talent. Together, the measures included in the preferred policy options for each of the actions contribute to improved labour mobility and skills matching. This is particularly relevant given the significantly higher overqualification rates observed among EU mobile workers (31.3%) and third-country nationals (39.4%) compared to domestic workers (20.2%).

The anticipated outcomes of the preferred policy options are intrinsically interrelated and mutually reinforcing in various ways.

Action 1 acts as a critical enabler for Action 2 as the availability of interoperable, secure and verifiable digital qualifications is crucial to allow for faster and less burdensome cross-border recognition processes under the PQD.

Conversely, the preferred policy option under Action 2 is expected to provide a concrete and reliable pathway for the benefits of digital credentials to materialise. Qualifications benefiting from automatic recognition account for almost half of all establishment recognition cases under the PQD. By ensuring that these qualifications are systematically issued and accepted in digital credential format, the preferred option would create a sizeable and predictable volume of use from the outset, thereby supporting the deployment and practical benefits of digital credentials across recognition procedures.

The preferred options under Action 1 and 2 also support the implementation of Action 3 as the creation of a unified digital workflow for the recognition of qualifications of EU citizens, linking the various competent authorities in the MS, facilitates the interoperability between national databases on third-country qualifications and recognition.

In turn, Action 3 ensures that third-country nationals benefit from a similarly robust, albeit specific, legal framework as EU citizens for the recognition of their qualifications, thereby establishing a more equitable level playing field in the EU labour market.

By working together to establish common approaches for the assessment and recognition of qualifications obtained outside the EU in the context of Action 3, MS may further strengthen mutual trust and cooperation between their competent authorities. This is expected to reinforce the practical application of the principle of mutual recognition, which is a cornerstone of the system for the recognition of professional qualifications within the EU, and may contribute to a more efficient, consistent and less burdensome treatment of qualifications obtained in other MS.

With respect to implementation costs, the preferred options yield significant synergies through two main channels:

By establishing common information standards, standards for digital credentials, verification mechanisms, and qualification databases, the initiative reduces the cost of presenting, verifying, and recognizing qualifications. As adoption grows, the value of these systems for workers, employers, and public authorities increases—creating network effects and economies of scale and maximizing the return on digital infrastructure investments.

Using the EQF as a universal reference framework across all three actions makes qualifications easier to compare, understand, and verify, minimizing information asymmetries and fostering greater trust within the EU. Furthermore, widespread adoption of the EQF within the Single Market incentivizes non-EU partners to relate to it, simplifying the integration and recognition of third-country qualifications.

The combined actions are expected to generate substantial economic benefits.

Action 1 is estimated to generate quantified direct benefits of approximately EUR 164–336 million over the period 2026–2040, primarily through reduced administrative costs associated with the presentation, assessment and verification of qualifications across borders. Employers are expected to benefit from lower costs for verifying and understanding qualifications from other MS, while workers will benefit from fewer and cheaper comparability procedures. Issuers of qualifications will also benefit from reduced administrative burdens as digital attestations enable automatic verification, reducing the need to respond to third-party requests. With its focus on digitalising NQF qualifications (which are most labour market relevant), the action directs the investment to the segment with the highest return, with positive spillovers on national labour markets and the area of further learning. Indirect benefits can also be expected: as the action contributes positively to the functioning of the internal market and EU competitiveness: it is expected to facilitate cross-border hiring with some effect on skills mismatches and improved labour market allocation.

Within the specific context of regulated professions, **Action 2** is expected to generate annual administrative cost savings of approximately EUR 28.7 million for applicants, competent authorities and, where they support recognition procedures on behalf of applicants, employers. In addition, they are projected to deliver an additional EUR 136.6 million per year in monetised time savings resulting from faster access to the labour market for professionals seeking recognition in another Member State. Taken together, these savings are estimated to amount to

approximately EUR 1.6 billion in present value terms over the period 2029–2040. Swifter, cheaper and less burdensome recognition procedures are also expected to generate considerable indirect economic and social impacts, supporting firm-level competitiveness, allocative efficiency of skills in the Single Market, improved employment opportunities, and increased resilience of essential social services such as healthcare.

Targeted specifically at third-country nationals, **Action 3** is expected to reduce administrative costs for applicants and CAs by over EUR 22 million/year, resulting in cumulative administrative savings of approximately EUR 231 million between 2029 and 2040. In addition, employers would benefit from a reduction of around 25% in administrative costs for applications under the general system and of approximately 42.5% for automatically recognised qualifications. At constant recruitment levels, the reduction of employer-borne recruitment costs is estimated at over EUR 20 million/year, resulting in a cumulative cost reduction of EUR 207 million between 2029 and 2040. PO3 would also reduce the processing time of recognition applications considerably, allowing qualified TCNs to exercise a regulated profession of their choice more quickly (by between 9 to 10 months depending on the recognition regime). This generates monetised time savings for the applicants, which in the aggregate are estimated at approximately EUR 300 million/year or slightly over EUR 3 billion from 2029 to 2040.

Better integration of third-country nationals in the Single Market is also expected to generate indirect but sizeable positive effects on firm-level competitiveness by facilitating access to a wider, geographically diverse pool of qualified applicants and alleviating critical shortages. At macro-economic level, the resulting increase in the overall labour supply and improved skills matching contributes to economic growth. From a social perspective, facilitating recognition of qualifications of third country nationals contributes to upward career mobility, improved long-term income security and, at macro-level, increased resilience of social services by addressing critical labour shortages in various sectors.

These estimated direct cost savings and anticipated economic and social benefits are not designed for aggregation, as some beneficiaries and impact channels overlap. Nevertheless, they point consistently towards substantial reductions in transaction costs and significant gains from earlier labour-market entry and improved skills utilisation.

The preferred options presented build on an independently existing IT infrastructure (the EUDI Wallet) that is considered in the baseline of Action 1 and Action 2. Common digital tools, interoperable systems and common information standards reduce duplication of effort and increase the benefits generated by implementation expenditure. As a result, the overall initiative is expected to be more cost-effective than separate interventions addressing each area individually.

The distribution of costs and benefits is uneven by design. Public administrations bear a significant share of implementation costs (which however are more effectively invested in the proposed coordinated manner compared to uncoordinated actions by MS), while a large share of the benefits accrues to workers and employers through reduced administrative burdens, lower

recruitment costs and faster access to employment opportunities. This reflects the objective of removing market frictions and improving labour-market functioning.

The main implementation challenge relates to ensuring interoperability and coordination across the different digital systems and governance arrangements established under the Initiative. Failure to achieve sufficient interoperability could reduce some of the expected efficiency gains and increase administrative complexity. These challenges are addressed by the use of common standards, shared digital infrastructure and phased implementation.

In general, the Skills Portability Initiative generates substantial synergies and economies of scale. By simultaneously addressing the presentation, verification and recognition of qualifications across different labour-market contexts, the three Actions deliver greater economic, administrative and social benefits than would be achieved through their separate implementation.

ANNEX 14: MONITORING

As outlined in Chapter 9, the following table sets out the proposed indicators to monitor implementation of the action and assess progress towards its objectives. The framework distinguishes impact indicators, capturing broader labour market outcomes, from output and process indicators, which track implementation of the measures. Baseline values marked 'Year 0' are to be established at the point of entry into force using the data sources indicated.

Table 14A.1 Monitoring Framework

Objective	Indicator	Data source	Responsible	Baseline	Frequency
General objective — Facilitate recognition of qualifications of TCN to address EU labour and skills shortages	Share of TCN in qualification-matched employment within 12 months of arrival	Eurostat LFS; national labour market data	Commission / MS	Year 0	Annual
	Number of recognition procedures initiated and completed per year by TCN	MS annual reporting	MS	Year 0	Annual
SO1 — Streamlined recognition systems within and between MS	Share of cases requiring parallel submissions (duplicate qualification checks across recognition and migration procedures)	MS annual reporting; migration authority data	MS	Year 0	Annual
	Number of cases requiring re-submission or additional information, as a share of total applications	MS annual reporting	MS	Year 0	Annual
	Share of recognition applications submitted digitally	MS annual reporting	MS	Year 0	Annual
SO2 — Reduced legal and administrative complexity	Average end-to-end processing time per recognition procedure, by MS and procedure type	MS annual reporting; CA surveys	MS / Commission	14.2 months	Annual
	Average number of documents requested per application, including certified translations	MS annual reporting; CA surveys	MS / Commission	Year 0	Annual
	Estimated applicant-side cost per recognition procedure	Periodic CA surveys	Commission	EUR 1,500	Every 3 years
	Share of complete applications at first submission	MS annual reporting	MS	Year 0	Annual
SO3 — Increased trust and understanding	Number of authenticity checks processed via the EU-level service per year	EU authenticity check service data	Commission	0 (new service)	Annual

of qualifications obtained in third countries					
	Share of CA reporting sufficient information on third-country qualification systems to make timely decisions without requesting additional documentation or compensation measures	CA surveys	Commission	Year 0 (survey)	Every 2 years
	Processing time for sectoral professions under automatic recognition channel	MS annual reporting; sectoral data	MS / Commission	14.2 months	Annual

ANNEX 15: RESOURCES

19. Annex 15: Resources

Shortened reference	Full reference
Anger et al. (2022)	Anger, S., Bassetto, J. and Sandner, M., Making Integration Work? Facilitating Access to Occupational Recognition and Immigrants' Labor Market Performance, IAB Discussion Paper No. 2022-03, Institute for Employment Research, Nuremberg, 2022.
Bernini et al. (2024)	Bernini, A., Icardi, R., Natale, F. and Nedee, A., Healthcare workforce demand and supply in the EU27, Publications Office of the European Union, Ispra, 2024, doi:10.2760/1683259, JRC139503.
Business Europe (2026)	BusinessEurope, [position paper / survey input on TCN qualification recognition — title to be confirmed], 2026.
CDR-1105-2025	European Committee of the Regions, Opinion CDR-1105-2025: Union of Skills. Available at: https://www.cor.europa.eu/en/our-work/opinions/cdr-1105-2025 .
Cedefop (2020)	Cedefop, Skills forecast 2020: Greece — Skills supply and demand up to 2030, European Centre for the Development of Vocational Training, 2020.
Cedefop (2021)	Cedefop, Skills forecast 2021 — Insights: EU labour market transitions and skills mismatches, European Centre for the Development of Vocational Training, 2021.
Cedefop (2023)	Cedefop, Skills forecast 2023: Trends and challenges to 2035, European Centre for the Development of Vocational Training, 2023. Available at: https://www.cedefop.europa.eu/en/publications-and-resources/publications/5581 .
COM (2016) 820 final	Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on reform recommendations for regulation in professional services, COM(2016) 820 final. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52016DC0820 .
COM (2023) 715	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, COM(2023) 715. Available at: https://commission.europa.eu/document/download/b8c2d90f-17b1-4a10-b91c-4aa536cd2103_en .

COM (2025) 90 final	Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions: The Union of Skills, COM(2025) 90 final. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52025DC0090 .
COM (2025) 500 final	Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: The Single Market: our European home market in an uncertain world, COM(2025) 500 final. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52025DC0500 .
Commission Recommendation (EU) 2023/2611	Commission Recommendation (EU) 2022/554 of 23 November 2023 on recognition of qualifications of people fleeing Russia's invasion of Ukraine, OJ L, 2023/2611. Available at: https://eur-lex.europa.eu/eli/reco/2023/2611/oj .
Commission Recommendation (EU) 2026/311	Commission Recommendation (EU) 2026/311 of 29 January 2026 on attracting talent for innovation. Available at: https://eur-lex.europa.eu/eli/reco/2026/311/oj .
Council Recommendation (2012)	Council Recommendation of 20 December 2012 on the validation of non-formal and informal learning, OJ C 398, 22.12.2012. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32012H1222(01) .
Czaika & Parsons (2016)	Czaika, M. and Parsons, C., The Gravity of High-Skilled Migration Policies, KNOMAD Working Paper No. 13, World Bank, Washington DC, March 2016.
DG EMPL/ECORYS (2017)	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 of the European Union, Luxembourg, 2017. Available at: https://op.europa.eu/en/publication-detail/-/publication/da2e75de-efce-11e6-8a35-01aa75ed71a1 .
DG HOME/K	European Commission, Directorate-General for Migration and Home Affairs and Kantar, Study on the factors influencing the recognition of third-country qualifications — Final report, 2023.

antar (2023)	
EIB (2024/2025)	European Investment Bank, Investment Report 2024/2025 [full title to be confirmed], European Investment Bank, Luxembourg, 2024. Available at: https://www.eib.org/en/publications/20240076-investment-report-2024-2025 .
ELA (2024)	European Labour Authority, EURES Report on labour shortages and surpluses 2024, European Labour Authority, Bratislava, 2024. Available at: https://www.ela.europa.eu/sites/default/files/2025-06/EURES_Report_on_labour_shortages_and_surpluses_2024.pdf .
EMN (2024a)	European Migration Network, Ad-Hoc Query 2024.16: Recognition of third-country qualifications for the profession of doctor with basic medical training, European Migration Network, 2024. Available at: https://home-affairs.ec.europa.eu/networks/european-migration-network-emn/emn-asylum-and-migration-database/ad-hoc-queries/recognition-third-country-qualifications-profession-doctor-basic-medical-training_en .
EMN (2024b)	European Migration Network, [second 2024 EMN source — title to be confirmed. Cited alongside MPF (2024) in fn 98 re timing of qualification checks in migration procedures].
EMN Study (2025)	European Migration Network, Study on Illegal Employment of Third-Country Nationals in the EU, European Migration Network, 2025.
EMN– OECD (2025)	European Migration Network and OECD, Inform on innovative strategies to attract foreign talent in EU Member Countries, EMN–OECD Inform, February 2025.
EPRS (2023)	European Parliamentary Research Service, Recognition of the qualifications of third-country nationals, Briefing, Pre-legislative synthesis, November 2023. Available at: https://www.europarl.europa.eu/RegData/etudes/BRIE/2023/754594/EPRS_BRI(2023)754594_EN.pdf .
ESDE (2023)	European Commission, Employment and Social Developments in Europe 2023: Addressing labour shortages and skills gaps in the EU, Publications Office of the European Union, Luxembourg, 2023. Available at: https://op.europa.eu/webpub/empl/esde-2023/esde-review.html .

ETF (2024)	European Training Foundation, [report title to be confirmed — cited in fns 130–131 on third-country institutional capacity and qualification recognition cooperation], European Training Foundation, Turin, 2024.
ETF (2025)	European Training Foundation, [report title to be confirmed — cited in fns 130–131], European Training Foundation, Turin, 2025.
EUCO 12/24	European Council Conclusions of 17 and 18 April 2024, EUCO 12/24. Available at: https://www.consilium.europa.eu/media/m5jlwe0p/euco-conclusions-20240417-18-en.pdf .
EURES (2024)	EURES, Report on labour shortages and surpluses 2024, European Labour Authority, Bratislava, 2024. Available at: https://www.ela.europa.eu/sites/default/files/2025-06/EURES_Report_on_labour_shortages_and_surpluses_2024.pdf .
Eurochambres (2024)	Eurochambres, 2024 Single Market Survey: Overcoming Obstacles, Developing Solutions. Available at: https://online.fliphtml5.com/hliel/ynjh/ .
Eurofound (2021)	Eurofound, Tackling labour shortages in EU Member States, Publications Office of the European Union, Luxembourg, 2021. Available at: https://www.eurofound.europa.eu/en/publications/2021/tackling-labour-shortages-eu-member-states .
Eurofound (2023)	Eurofound, Measures to tackle labour shortages: Lessons for future policy, Publications Office of the European Union, Luxembourg, 2023. Available at: https://www.eurofound.europa.eu/en/publications/2023/measures-tackle-labour-shortages-lessons-future-policy .
Eurofound (2024)	Eurofound, SMEs that recruited non-EU workers, EU and Member States (% of SMEs), Eurofound data catalogue, published September 2024. Available at: https://www.eurofound.europa.eu/en/surveys-and-data/data-catalogue/smes-recruited-non-eu-workers-eu-and-member-states-smes .
Eurofound (2025)	Eurofound, Undeclared Work in the European Union, Publications Office of the European Union, Luxembourg, 2025.
European Commission (2011)	European Commission, [study or report on certified translations / documentation requirements in qualification recognition — title and URL to be confirmed], 2011.

European Commission (2021)	European Commission and Social Protection Committee, Long-Term Care Report: Trends, Challenges and Opportunities in an Ageing Society, 2021, Publications Office of the European Union. Available at: https://op.europa.eu/en/publication-detail/-/publication/484b0ceb-cd83-11eb-ac72-01aa75ed71a1/language-en .
European Commission (2022)	European Commission, Eurobarometer: Intra-EU mobility after the pandemic, December 2022. Available at: https://europa.eu/eurobarometer/surveys/detail/2671 .
European Commission (2023a)	European Commission, Employment and Social Developments in Europe 2023. Available at: https://op.europa.eu/webpub/empl/esde-2023/ .
European Commission (2023b)	European Commission, FIT FOR FUTURE Platform Opinion 2023/5: Fostering Professional Mobility in the Single Market, 28 November 2023. Available at: https://commission.europa.eu/system/files/2023-11/final_opinion_2023_5_professional_mobility.pdf .
European Commission (2023c)	European Commission, Flash Eurobarometer 529 — SMEs, skills shortages and public support, 2023.
European Commission (2024)	European Commission, Eurostat: Almost 40% of non-EU citizens over-qualified in 2023, Eurostat News, 26 July 2024. Available at: https://ec.europa.eu/eurostat/en/web/products-eurostat-news/w/ddn-20240726-1 .
European Commission (2025a)	European Commission, Eurostat Statistics Explained: Migrant integration statistics — labour market indicators, data extracted in May 2025. Available at: https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Migrant_integration_statistics_%E2%80%93_labour_market_indicators .
European Commission (2025b)	European Commission, Eurostat Statistics Explained: Residence permits — statistics on authorisations to reside and work, data extracted in December 2025. Available at: https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Residence_permits_%E2%80%93_statistics_on_authorisations_to_reside_and_work .
European Commission (2025c)	European Commission, Migration, mobility and the EU labour market, 17 November 2025. Available at: https://economy-finance.ec.europa.eu/migration-mobility-and-eu-labour-market_en .

European Commission (2025d)	European Commission, Strategic Foresight Report 2025 — Resilience 2.0, Publications Office of the European Union, Luxembourg, September 2025.
European Commission (2026a)	European Commission, Eurostat Statistics Explained: EU population diversity by citizenship and country of birth, data extracted in February 2026. Available at: https://ec.europa.eu/eurostat/statistics-explained/index.php?title=EU_population_diversity_by_citizenship_and_country_of_birth .
European Commission (2026b)	European Commission, Eurostat Statistics Explained: Population projections in the EU, data extracted in April 2026. Available at: https://ec.europa.eu/eurostat/statistics-explained/SEPDF/cache/44711.pdf .
European Parliament (2019)	European Parliament, The cost of non-Europe in the area of legal migration, European Parliamentary Research Service, March 2019. Available at: https://www.europarl.europa.eu/RegData/etudes/STUD/2019/631736/EPRS_STU(2019)631736_EN.pdf .
Federal Ministry of Austria (2024)	Federal Ministry of the Republic of Austria, Regional Strategy of the Austrian Development Cooperation with the Western Balkans 2025–2027, Vienna, 2024. Available at: https://www.entwicklung.at/fileadmin/user_upload/Dokumente/Publikationen/Laenderprogramme/RS_Western_Balkans_2025-2027.pdf .
Flash Eurobarometer 571 (2025)	European Commission, Flash Eurobarometer 571 — SMEs and skills, December 2025.
Letta (2024)	Letta, E., Much more than a market: Speed, Security, Solidarity. Empowering the Single Market to deliver a sustainable future and prosperity for all EU Citizens, report to the European Council, April 2024. Available at: https://www.consilium.europa.eu/media/ny3j24sm/much-more-than-a-market-report-by-enrico-letta.pdf .
MPF (2024)	Migration Partnership Facility, Mapping Labour Migration Pathways in the EU [series — Austria and others], 2024. Available at: https://www.migrationpartnershipfacility.eu/resources .
OECD (2019)	OECD, Recent Trends in International Migration of Doctors, Nurses and Medical Students, OECD Health Policy Studies, OECD Publishing, Paris, 2019. Available at: https://doi.org/10.1787/5571ef48-en .

OECD (2020)	OECD, COVID-19 and key workers: What role do migrants play in your region?, OECD Policy Responses to Coronavirus (COVID-19), 26 November 2020. Available at: https://www.oecd.org/en/publications/covid-19-and-key-workers_4571c655-en.html .
OECD (2023)	OECD, International Migration Outlook 2023, OECD Publishing, Paris, 2023. Available at: https://doi.org/10.1787/b0f40584-en .
OECD (2024)	OECD, Health at a Glance: Europe 2024 — State of Health in the EU Cycle, OECD Publishing, Paris, 18 November 2024. Available at: https://doi.org/10.1787/b3704e14-en .
OECD (2025)	OECD, International Migration Outlook 2025, OECD Publishing, Paris, 2025. Available at: https://www.oecd.org/en/publications/international-migration-outlook-2025_ae26c893-en.html .
OECD/European Commission (2023)	OECD and European Commission, Indicators of Immigrant Integration 2023: Settling In, OECD Publishing, Paris, 2023. Available at: https://doi.org/10.1787/59be6a5b-en .
SME Panel Survey (2026)	European Commission, SME Panel Survey on TCN qualification recognition and recruitment practices (n=159), conducted as part of the SPI Action 3 Impact Assessment stakeholder consultation, 2026.
SMEunited (2026)	SMEunited, <i>Skills Portability Initiative — SMEunited input</i> , 2026. Available at: https://www.smeunited.eu/publications/skills-portability-initiative-smeunited-input
SOC/837-EESC-2025	European Economic and Social Committee, Opinion SOC/837-EESC-2025: Union of Skills. Available at: https://www.eesc.europa.eu/en/our-work/opinions-information-reports/opinions/union-skills .
Van Enk & Bilgili (2026)	Van Enk, B., Bilgili, Ö. and Solano, G. (2022), Higher educated ethnic minority members not immune to discrimination: Exploring the 'discrimination paradox' across the European Union, Migration Policy Group
Von der Leyen (2024)	Von der Leyen, U., Europe's Choice: Political Guidelines for the next European Commission 2024–2029. Available at: https://commission.europa.eu/document/download/e6cd4328-673c-4e7a-8683-f63ffb2cf648_en .

