

BRIEFING

Competitiveness and the recognition of professional qualifications

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This briefing takes **competitiveness** as its main focus. What is it? And what is the role of higher education?

The sector has experience of grappling with European Commission clarion calls. Think of the 'Europe of knowledge', the seductive watchword which galvanised institutions in 1997. Or Michel Barnier's attempt to relaunch the internal market in 2011. Twin drives – to boost research and market integration – which met with some success. But the Commission now argues that both need re-igniting, with more urgency than ever before.

So where do the institutions – the high-skilled training providers – stand? In June 2025, the published programme of the Danish Presidency of the Council of EU suggested the way forward. Higher education's role is to be collaborative, not directly competitive, for it is the outcomes of its collaborations that will fuel the competitiveness of all other economic sectors. Higher education is the essential pre-condition, the bedrock.

EUA welcomed the challenge. In support, this briefing offers a digest of recent policy initiatives. They exist in profusion; some would say confusion. Therefore, the chapters below are ordered by the portfolios of relevant European Commissioners, many of which overlap.

The briefing also includes a section on trade agreements, which often contain provisions relating to the mutual recognition of professional qualifications – and always cover the mobility of qualified professionals. International labour market considerations, in other words, of which the higher education sector at large is not well informed.

The Commission's work programme for 2026 hails the year as 'Europe's independence moment'. Will it be momentous or will the effect be merely momentary? Will policy proliferation mean policy paralysis or a great leap forward?

Time will tell. This briefing is not a foresight study. The economic and political landscape is fraught with known challenges and unknown contingencies.

One development promises much: the Commission's Unit charged with cross-border management of professional qualifications has moved from the Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs (DG GROW) to the Directorate-General for Employment, Social Affairs and Inclusion (DG EMPL). Closer, in other words, to where the labour market significance of academic recognition is already given high priority.

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INTRODUCTION

1.1 The [programme of the Danish presidency](#) (July-December 2025) echoed the lamentations of earlier Polish and Hungarian presidencies. EU competitiveness, it said, is in decline. The remedy? Strategic continuity, with a stronger boost for the green transition. Keep calm and carry on. The current [Cypriot presidency](#) holds the line, but with a rising sense of urgency.

Despite the promptings of Mario Draghi and Enrico Letta¹ (see EUA's [October 2024 briefing](#)), the Commission's drive to simplify regulatory frameworks within the Single Market has made little progress. The [Draghi Observatory and Competitiveness Index](#) noted that after one year only 10% of measures had been implemented.

A [report by the European Round Table for Industry](#) paints European business leaders as increasingly sceptical – and under pressure from the Trump administration's "reciprocal" tariff regime to move their investments away from the EU.

How is the higher education sector to react to calls to become more competitive at a time when business confidence is leaching and the political context (Ukraine, China, EU budget) challenging?

The Danish Presidency had set broad agendas across Council configurations. The word *competitiveness* recurred insistently, so its absence from the Education, Youth, Culture and Sport chapter was particularly striking. Here, the watchword was *cooperation* – in "quality, equity, inclusion, mobility, lifelong learning, as well as digital and green education" [p.45].

The message was clear. Higher education must reinforce competitiveness by furthering labour market integration and by working collaboratively on the compatibility of educational structures, policies and outcomes. High-level skills must be transferable across borders and across employments.

The higher education community will feel comfortable with this approach, as long as its autonomy suffers no encroachment. Its collaborations will be one of the pre-conditions of European competitiveness, but within the sector there will be no outright compulsion to compete.

1.2 A quick look back at Letta and Draghi:

- ◆ **Letta** addressed market integration in financial services, energy, telecoms and, to a lesser extent, healthcare.
- ◆ He called for the recognition of qualifications (professional and academic) to be expedited, member states' regulatory structures and practices to be rationalised, labour market needs to be better mapped, and the European Degree to be rapidly introduced (pp.102-3).
- ◆ **Draghi** called for clean tech professions (solar panel, heat pump, wind turbine engineering) to be given automatic recognition, while pondering "whether it is actually necessary to regulate entry into specific professions, and how to effectively and fairly recognise the validity of country-specific qualifications" [Part B, p.265].
- ◆ On higher education he fell back on already long-pursued policies: university-industry cooperation, employer involvement in curriculum design, recognition, inclusion, employability, lifelong learning, individual learning accounts, micro-credentials, data collection.
- ◆ He made only a passing reference to Erasmus+ and ignored the Bologna Process – nevertheless declaring that "competitiveness today is less about relative labour costs and more about knowledge and skills embodied in the labour force" (Part A, p.9).

¹ The Letta report [Much More than a Market](#) (published in April of last year) and the two-volume [Draghi Report on the Future of European Competitiveness](#), which appeared in September. We discussed the Reports in our [October 2024 Briefing](#).

1.3 Letta and Draghi left their imprint on the European Commission's [work programme for 2025](#). Competitiveness loomed large. Indicatively scheduled in its Annexes were 12² new initiatives, including:

- ◆ Competitiveness Compass (non-legislative, Q1 2025)
- ◆ Single Market Strategy (non-legislative, Q2 2025)
- ◆ Union of Skills (non-legislative, Q1 2025)

These came into being and duly inform the [2026 work programme](#), incautiously entitled *Europe's independence moment*, which aims to progress other measures, some in train, some on the drawing board: the Skills Portability Initiative, the Traineeships Directive, and of course Erasmus+ 2028-34. (The proposed [Directive on European cross-border associations](#), which might have facilitated trainee mobility and the work of the European Universities alliances, was shelved just before the work programme's publication.)

This bundle of legislative items will determine how the recognition of qualifications in higher education can enhance the competitiveness of the EU. Underpinning it is a putative Competitiveness Coordination Tool, intended to befit a policy package which is more than the sum of its parts – demanding a high level of inter-service cooperation between DGs, facilitated by Executive Vice-Presidents and Commissioners with overlapping remits and subject to management by President von der Leyen. The [Council's website](#) dated 25 July suggested that the Tool, “whose objective will be to better align common strategic interests at EU and national levels” was still in gestation. Its profile remains hazy.

1.4 The [Competitiveness Compass](#) emerged in January 2025, kick-starting the second von der Leyen Commission. A signal agenda-setting statement declaring security (geo-economic and geo-strategic) to be paramount. This was a useful pointer: competitiveness is essentially defensive.

The three pillars of the Compass generate flagship actions:

- ◆ Closing the innovation gap
- ◆ A joint roadmap for decarbonisation and competitiveness
- ◆ Reducing excessive dependencies and increasing security

And the pillars are nourished by horizontal enablers:

- ◆ Simplifying EU regulation
- ◆ Expanding and further integrating the Single Market
- ◆ Capital markets integration and a multiannual financial framework (MFF) which incorporates a Competitiveness Fund
- ◆ “Promoting skills and quality jobs while ensuring social fairness: legislative proposals on Single Market strategy, Union of Skills, Quality Jobs Roadmap, Skills Portability Initiative”

The Compass emanated from the Directorate-General for Migration and Home Affairs (DG HOME), the remit of Commissioner Magnus Brunner. For professional qualifications, it is necessary to look at the portfolios of two Executive Vice-Presidents and other Commissioners, all bound to regard higher education instrumentally as a ‘horizontal enabler’.

2 The remaining nine related to decarbonisation, financial services, pharmaceuticals, and maritime law.

2. EXECUTIVE VICE-PRESIDENT SÉJOURNÉ

2.1 Tasked by the President with the production of a [Single Market Strategy, Executive Vice-President Stéphane Séjourné](#), in charge of “Prosperity and Industrial Strategy”, delivered it on time in May. The Market had to be rendered “simple, seamless and strong”. Seamlessness, with its utopian resonance, is now firmly lodged in Commission rhetoric.

2.2 The Commissioner is also charged with developing the [European Competitiveness Fund](#) (ECF). The [proposed Regulation](#) published in July came on the back of a critical review by the Commission’s own independent [Regulatory Scrutiny Board](#). The ex-ante impact assessment, it said, “does not sufficiently elaborate the definition of competitiveness nor does it indicate how the ECF is to strengthen European competitiveness.”

Regarding a Fund, the administration of which may cost over €1,200 million in the period 2028-2034, this was not a trivial comment.

It is not clear how the published ECF text was subsequently amended. It advances no explicit definition of competitiveness. We can extrapolate from the action plans and budget proposed, but only provisionally. [Recital 61](#) speaks of a “targeted experimentation”, allowing “within a concretely defined frame, to specify on a case-by-case basis certain actions or categories of actions to benefit from certain additions, derogations and exceptions from other Union legislation and to test the impact in a real-world environment for the limited period of the duration of the ECF while ensuring that appropriate safeguards, in particular a common European interest, are in place.”

This baffling formulation invites the lay reader simply to wait and see. Public and private sector stakeholders will doubtless compete for the interpretation of competitiveness that best suits their interests.

An implementation evaluation of the ECF is foreseen for the end of 2031. Will it ever happen? Certainly the Cypriot presidency intends to keep its foot on the accelerator. The Fund is integral to the planning of the 2028-34 MFF, which makes it controversial. It is perceived by many as bound to impinge on the volume and the relatively free-standing character of the 12 significant funding instruments which it seeks to consolidate in support of greening and defence.

After many anxious moments, the research community has been partly reassured that the next framework programme for research and innovation (FP10) will remain stand-alone, albeit “tightly connected” [p.2] to the ECF “to ensure a seamless investment journey from research to start-up, scale up, deployment and global manufacturing, from idea to market.” [p.3].

With all of this in mind, it is difficult to see how the ECF will work. Recital 12 alludes to the Competitiveness Coordination Tool, but gives no reference.

2.3 The ECF proposal makes no direct reference to professional training and qualifications. However, we know from the Commission’s [2025 Annual Single Market and Competitiveness Report](#) (January 2025) that it “is working on possible solutions to speed up and simplify the system of recognition of professional qualifications” [p.7], particularly those of third country nationals.

Doubtless this is a reaction to a damning [report by the European Court of Auditors](#) (October 2024) which found professional recognition at European level to be an “essential mechanism, [...] used sparsely and inconsistently”. Many of the shortcomings were down to flawed implementation of

the Directive by member states – underuse of partial access provisions, casual regard for alert mechanisms and lack of action on Common Training Frameworks. These are areas in which the Court of Auditors considered the Commission to have insufficient grip: it identified issues in the transposition of the Directive, but failed to follow up on implementation.

2.4 One significant, but in light of the above unsurprising, development has now changed the picture. **The unit charged with managing the recognition of professional qualifications has been transferred from DG GROW to DG EMPL.** It has become Unit EMPL.B.5 Professional Qualifications and Skills for Competitiveness, headed by Steven Engels. Its transfer means that the Group of Coordinators of [Directive 2005/36/EC](#)³ is now chaired by DG EMPL. Its focus is bound to change. Time will tell. (For a tabulation of the topics addressed recently by the Group of Coordinators, please see Annex A.)

2.5 Séjourné's [Single Market Strategy](#) (May 2025) offered a succulent carrot – increased prosperity and security for all member states – while brandishing a stick. Infringement proceedings would be accelerated and “accompanied by transparent communication and clear explanations regarding the objectives pursued, the expected benefits of infringement decisions as well as the results achieved in cases where proceedings are closed.” [p.28]

This is good news; DG GROW's regular ‘infringement packages’ typically record all stages of the infringement proceedings except the final outcomes. It remains to be seen whether DG EMPL will handle infringements of the Directive. (For information on recent rounds, please see Annex B.)

3. EXECUTIVE VICE-PRESIDENT MÎNZATU

3.1 [Roxana Mînzatu is Executive Vice-President for Social Rights and Skills, Quality Jobs and Preparedness](#). She oversees the work of the Directorate-General for Education, Youth, Sport and Culture (DG EAC) and DG EMPL and yet, as the European Parliament and indeed the whole higher education sector have observed, education appears nowhere in her title. No matter, she still has the task of strengthening the European Education Area's contribution to the EU labour market, citizenship and inclusion.

Her in-tray is full: the green and digital transitions; European Universities alliances; the European Degree; support for teacher education; flexible lifelong learning provision, including cross-border learning, robust VET and Individual Learning Accounts; the [STEM Education Strategic Plan](#); and the Skills Portability Initiative to widen the scope of the recognition of qualifications. These are all live issues; Council's recent [draft Resolution on second cycle of the strategic framework for European cooperation in education and training towards the European Education Area \(2026-2030\)](#) confirms as much. Promised for the coming year is a Fair Labour Mobility Package.

The Skills Portability Initiative has still to be fleshed out. A recent [consultation](#) closed on 27 February. The outcomes will be interesting, given the larger footprint that DG EMPL now enjoys within the Single Market. Suddenly, there is space for marrying the two discourses on automatic recognition – that of the Directive (professional) and the EHEA (the academic). DG GROW was historically resistant to the Bologna Process. So the Unit transfer may lead to new ways of looking at the Directive, at the digitalisation of recognition, green skills, credit accumulation, quality assurance, qualification frameworks, and the European Degree. All that is for the future; first comes the (delayed) evaluation of the Directive, and only subsequently any proposals for revision.

³ Hereinafter referred to simply as ‘the Directive’.

3.2 The Commission's Communication on the [Union of Skills](#) (March 2025) makes over to Mînzatu issues relating to the qualifications of third country nationals and the new [EU Talent Pool](#), as well as the accession of the EU to the Lisbon Recognition Convention. The latter may prove problematic if the member states – all of which are parties – were to feel their national competence compromised.

3.3 Liaison with Executive Vice-President Séjourné remains paramount. Article 30 of the draft ECF Regulation states that the Fund “shall finance activities in support of skills development, in particular in the strategic sectors, building strong links between higher education, vocational education and training providers, applied research and businesses for an agile, innovative and competitive economy.” Recital 21 suggests that it “could also support activities of University Alliances, also in cooperation with employers, to improve their delivery on innovation and the development of skills and talent.”

Sparking this vision is a passage in the annexed [staff working paper](#):

The Commission recently launched a „Union of Skills“, which also foresees the review and the targeted implementation of EU Skills Academies [not to be confused with the European University Alliances], with the aim of targeting strategic sectors such as defence, automotive, the circular economy, wind, grids, food, digital. However, the current resource allocation leads to a fragmented approach. The absence of synergy and coordination impedes the creation of a skills agenda, affecting the potential for upskilling and reskilling in crucial areas, limiting Europe's ability to develop a competitive and resilient workforce for the future. [p.35]

Whatever the unification of training providers might mean in practice, the higher education sector has broadly welcomed the Union of Skills, with the caveat that institutions are not solely, or even primarily, suppliers to the labour market. The [European Students' Union](#) has a long list of asks, specifically that STEM become STE(A)M, incorporating the creative industries and ensuring that science, technology and mathematics programmes are not walled off from the humanities. It wants the Skills Portability Initiative to feature micro-credentials and to prioritise the recognition of prior learning.

[EUA](#) regards the Union of Skills initiative as timely, but insufficiently strategized and lacking in urgency. It calls for a flagship lifelong learning programme (readers may remember the Grundtvig chapter of the SOCRATES programme). It points to the endemic problems of financial sustainability and calls for a dedicated Skills Fund to attract investment from public and private sources.

3.4 Mînzatu is also responsible for Erasmus+. Its future budget is still in negotiation. She hopes to complement it through greater synergy with the [European Social Fund Plus](#), as well as with the ECF. The [Erasmus+ annual work programme](#) for 2026 acknowledges its underpinning by the Union of Skills. The programme has a strong focus on recognition in the accepted Bologna Process usage of the term (i.e. for academic purposes), but nothing touching on professional qualifications.

3.5 Back in 2010, [Mario Monti](#) called for green and digital professional qualifications to be eligible for the automatic recognition facility furnished by the Directive. In 2010... sixteen years ago! Surely now DG EMPL has the perfect opportunity to heed this call. If and when it does, the new [European Higher Education Sector Scoreboard](#) will prove a valuable resource. It boasts wide geographical coverage and focuses on mobility, transnational cooperation, digital and green skills, aggregating for the first time data from all the major European sources.

3.6 Meanwhile, much work is under way in the field of academic recognition. For a green example, check the EBU label - the 'EBU student journey Bioeconomy qualification supplement' – developed by the [European Bioeconomy University](#), a European Universities alliance. Here are other, not specifically green, examples:

- ◆ The [role of AI in recognition](#) is reflected in new terms of reference for the ENIC-NARIC centres and in deliberations of the Lisbon Recognition Convention Committee;
- ◆ The [AUREA project](#) addresses the automatic recognition of mobility;
- ◆ The [European Higher Education Interoperability](#) project brings together a gamut of policy strands (digital education, mobility, STEM, green skills) under one umbrella for a wide group of stakeholders;
- ◆ The [Futurium peer exchange group on the European Learning Model](#) has a similar role within the field of digital education;
- ◆ For an excellent introduction to European Digital Credentials, readers should check DG EMPL's October 2024 webinar on [YouTube](#) and visit the [European Digital Credentials](#) website;
- ◆ The [TPG-LRC Plus project](#), coordinated by the Italian NARIC CIMEA and linked to the Bologna Process' [Thematic Peer Group B](#) on the Lisbon Recognition Convention, explores the possibility of using the European Quality Assurance Register for Higher Education (EQAR)'s quality assurance database to support automatic recognition;
- ◆ A new and ambitious EQAR project, [DIGI-REQA](#), is working to integrate online quality assurance records and digital qualification banks, with practical application to the [Benelux and Baltic Recognition Agreement](#).

All of these open up perspectives in which, under DG EMPL, the recognition of professional qualifications might evolve.

4. COMMISSIONER VÁRHELYI

4.1 The greatest strain on the EU labour force is in the healthcare sector, its strength sapped by internal migrations, medical deserts, the ageing profile of practising professionals, and the uncoordinated provision of training places in medicine by member states.

The view of the Directorate-General for Health and Food Safety (DG SANTE) led by [Commissioner Olivér Várhelyi](#), laid out in its [annex to the 2025 work programme of the EU4Health programme](#), is that the impact of existing training and health education providers – even after “several decades of excellent output” – remains fragmented. Remedial action, such as the Health Union Fellowship Programme, a new in-service continuing professional development provision for mid-career health policy makers, is limited.

4.2 Planning is under way to repeal EU4Health and to consolidate its remit within the ECF. This is controversial; [high-profile professional bodies](#) (medical doctors, nurses, public servants) are opposed. The draft ECF Regulation puts significant emphasis on innovation in biotechnology, but beyond research, there is little on offer. It is hard to find reference to professional qualifications, despite the significance of scientific innovations for curriculum designers. Nothing in the Competitiveness Fund directly addresses the concerns expressed by Letta and by professional bodies regarding the lack of an EU healthcare workforce integration strategy.

4.3 Despite the low profile of health in the Union of Skills, there is no lack of evidence on the parlous condition of the labour force. Suffice it to look at reports by the [EU and OECD](#) in 2024; by

Eurostat, on the [ageing medical workforce](#), in January 2025; and two reports in May 2025 by the WHO's European Health Observatory – one on [digital competences](#), the other on [green skills](#).

4.4 AI skills are in desperately short supply, given the speed of innovation in the healthcare sector. A [study commissioned by DG SANTE](#) stresses the need for digital health literacy programmes at bachelor's and master's levels. AI is inadequately addressed in basic training programmes and continuing professional development; healthcare workers who lack the relevant competence risk undermining patient-centred care and patient safety.

Also worth consulting are the overview of the global state of medical education, [Foreign medical education: Widespread. Unknown. Unregulated](#), by Philip Altbach and Hans de Wit; and the pilot programme run by the Dutch NARIC [Nuffic](#) on the integration of holders of non-EU healthcare qualifications.

4.5 Professional bodies at EU level continue to lobby for more joined-up action. Here is a sample of recent developments in the major healthcare professions:

Medicine

- ◆ In July 2025 the Standing Committee of European Doctors (CPME) published a [dossier](#) on the medical workforce 'on the brink';
- ◆ The Erasmus+ [HEAL Project](#) calls for higher quality internships, facing the challenge to clinical placement opportunities caused by the growth of community-based patient care.

Dentistry

- ◆ In May 2025, the Council of European Dentists (CED) published a statement on the [Quality of cross-border dentistry](#) and passed a resolution concerning the [use of AI in dentistry](#);
- ◆ The Association for Dental Education in Europe (ADEE) has a special issue of its European Journal of Dental Education on the [deployment of AI](#);
- ◆ ADEE also has sounded out stakeholders on how best to evolve its [Graduate European Dentist \(GED\)](#) curriculum;
- ◆ The ADEE peer review programme [LEADER](#) has commended the quality of dental faculties in Iraq and Tunisia.

Nursing

Nurses are the healthcare workforce's largest component group. The profession is the least stable and subject to ageing, migration, high demand, low pay and competition from the private sector. The [European Federation of Nurses' Associations \(EFN\)](#) provides comprehensive overviews of recent developments.

One year into the Commission's [agreement with the WHO](#) to attract and retain nurses, a sample of news reports provides telling evidence that national systems are in crisis:

- ◆ [Ireland and Kenya](#) are in discussion about mutually beneficial arrangements for professional development and migration;
- ◆ [Italy](#) is seeking to recruit qualified nurses from India;
- ◆ [Germany](#) recruits from a wide range of countries; this effort will likely intensify, if – as the *Financial Times* reported on 4 January – Syrian refugee health-workers continue to leave the country in large numbers;

- ◆ [Portuguese nurses](#) are opting to work abroad – in Switzerland, Spain, France, UK, as well as in Saudi Arabia and in the United Arab Emirates;
- ◆ Outside the EU, the [UK](#) remains dependent on ‘non-ethical’ recruitment from countries red-listed by the WHO.

In preparation for the impending evaluation of the Directive, the Commission launched a consultation:

- ◆ In response, the European Federation of Educators in Nursing Science ([FINE](#)) is confident that the Directive can be made more effective – by recognising the role of simulation in clinical training (fully resourced and not as a cost-saving exercise), as well as rewriting the training requirements in terms of the European Credit Transfer and Accumulation System (ECTS), European Qualifications Framework (EQF) and learning outcomes.

Midwifery

- ◆ Stakeholder views on the Directive’s prescriptions are summarised [here](#).

Pharmacy

- ◆ European Community Pharmacists (PGEU), CPME and EFN issued a [joint statement](#) urging the European Parliament to pressure the Commission into urgent action to reverse the downward trends in the healthcare labour force.

Veterinary

- ◆ Here there has been movement. In April 2025, following [stakeholder consultation](#), the Commission adopted a [delegated act](#) amending the minimum training requirements for veterinary surgeons laid down in Article 38 of the Directive. The set of required knowledge and skills is increased by three: One Health, veterinary business management, and relevant digital competences. In Annex V, which lists the bodies of knowledge to be covered in the curriculum, pharmacology now includes “pharmacotherapy (including antimicrobial resistance)”. Food microbiology has been added to the food hygiene category. (Such changes will have been agreed by at least 16 member states.)

5. COMMISSIONER KOS AND COMMISSIONER ŠUICA

5.1 [Commissioner Marta Kos](#) is responsible for the new Directorate-General for Enlargement and Eastern Neighbourhood (DG ENEST). Enlargement can enhance EU competitiveness, for two reasons: it will expand the labour force and potentially its cross-border mobility; it will increase the size of the internal consumer market, contribute to the security of supply chains, and boost the EU’s leverage in trade negotiations with third countries.

The latest official overview of the state of play regarding (1) the recognition of professional qualifications and (2) alignment with EU higher education policy dates from November 2025. Relevant snippets from the [candidate country reports](#) are set out in Annex C. The Commission is committed to accelerating the enlargement process; member states have differing views.

5.2 Meanwhile, the other half of the old Directorate-General for Neighbourhood and Enlargement Negotiations (DG NEAR) became the Directorate-General for the Middle East, North Africa and the Gulf (DG MENA), [led by Commissioner Dubravka Šuica](#). It has produced a [Pact for the Mediterranean](#). Sparked by the politicisation of migration into the EU, it nonetheless claims a broader, developmental, focus with a higher education dimension. A Mediterranean University is mooted, with potential Euro-

Med institutional alliances. There is no mention of the mobility of highly qualified professionals, as recognition is now the responsibility of DG EMPL and mobility the responsibility of the Directorate-General for Trade (DG TRADE), led by [Commissioner Maroš Šefčovič](#). Still, in a sign that regulatory borders are becoming less rigid, both Algeria and Morocco have announced that they will give automatic recognition to French academic qualifications.

6. COMMISSIONER ŠEFČOVIČ

6.1 The official position of the EU is that competitiveness will thrive in the rule-based order embodied by the World Trade Organisation (WTO). Yet it has long been aware of the tensions within the WTO, deriving from the geo-strategic confrontation of the USA and China, the reluctance of India and South Africa to participate in consensual governance, and to some extent by the EU's own efforts to export its own regulatory practices – the 'Brussels effect' – in areas such as deforestation and carbon leakage.

Most of the competitiveness policy statements discussed earlier predate President Trump's imposition of allegedly reciprocal tariffs and the forging of the EU-US trade deal. The EU's [Framework on an Agreement on Reciprocal, Fair, and Balanced Trade \(,Framework Agreement', August 2025\)](#) is concerned only with trade in goods, has no legal basis and can only retrospectively be deemed WTO-compliant if and when it evolves into a formal free trade agreement. It is best viewed as a symptom of the very insecurity and volatility that the competitiveness imperative seeks to dispel.

6.2 On the plus side, Trump has impelled a sense of urgency in other bilateral negotiations. [The EU-Mercosur agreement](#) was, after repeated delays, signed in Paraguay in January 2026. Two of the four Latin American parties (Argentina and Uruguay) ratified it immediately. This gave the European Commission the option of triggering the agreement's "provisional application", which it has said it will do.

Chapter 10 allows, without prescribing, the recognition of professional qualifications (Art.10.11). It also addresses the mechanics of recognition: to the accepted concept of substantial difference it prefers the weaker form 'deficiency' (Art.10.17). Latin America historically has not been strong on recognition. Subsequent articles deal with application for recognition and the verification of qualifications.

6.3 The modernised (from 2020) [Global Agreement with Mexico](#) reached the adoption stage at the same time. On recognition, it is more specific. Chapter 10 and Annex XX follow the model used in the EU-Canada FTA (the CETA), encouraging "the relevant professional bodies or authorities, as appropriate" to draft mutual recognition agreements (MRAs). It provides a template indicating scope for compensatory measures in the event of substantial difference.

6.4 The EU and Indonesia concluded a [Comprehensive Economic Partnership Agreement \(CEPA\)](#) in September 2025. Article 8.27 sets out the same framework for MRAs. An Annex XX containing detailed guidelines has not been posted on the DG TRADE website, although agreement was reached in the 16th negotiation round in December 2023.

MRAs can take a long time. Ten years of gestation, if one is to judge by the [adoption in 2024](#) of the CETA MRA in architecture.

6.5 In the wake of EFTA's [trade and economic partnership agreement with India](#) (TEPA), the EU is striving, with great difficulty, to do the same. [Negotiation round 9](#) (September 2024) reported

progress on recognition, but the details of services provision had still to be agreed. The Commission subsequently published a new [strategic agenda](#) which aims to raise the level of “skills mobility”, to be supported by a new visa strategy. The intention is to draw India into much tighter cooperation on student and researcher mobility, VET, apprenticeships and recognition of academic qualifications. [Negotiation round 14](#) (October 2025) suggests that negotiations on services are near completion, but it has been left to the Cypriot presidency to bring them to fruition.

President von der Leyen met Prime Minister Modi in February 2025, [agreeing](#) inter alia to “strengthen people-to-people ties especially in the areas of higher education, research [...]”⁴. Similar intent is reported to feature in talks with the Gulf Cooperation Council (Bahrain, Kuwait, Oman, Qatar, Saudi Arabia and the UAE). Talks with the [UAE](#) on a future FTA are in their early stages; the Cypriot presidency has promised to push them hard.

6.6 Nearer to home, the EU sealed a deal on a package of [agreements with Switzerland](#) in June. These amend previous agreements in a spirit of gradual regulatory convergence. Annex 9 sets out the provisions covering the association of Switzerland to, among other programmes, Horizon Europe and Erasmus+. Annex 1, confusingly, contains an Annex III concerning the free movement of persons. It covers recognition of qualifications, inserting relevant Swiss data into Annex V of the Directive, as well as into [Directive 77/249/EEC](#) on the mobility of lawyers. It also deals with access to EURES and IMI (the internal market information system on the movement of professionals).

In October, the Council duly gave its [green light](#) to Switzerland joining a range of EU programmes: Horizon Europe, Euratom Research and Training, ITER/Fusion for Energy (F4E), Digital Europe, Erasmus+, as well as EU4Health.

On the Swiss side, the agreed measures may be subject to referendum.

6.7 The EU’s post-Brexit [Trade and Cooperation Agreement](#) with the UK remains in place. The formally agreed ‘adjustment period’, which ends on 30 June 2026, has provided a window for *rapprochement*. A welcome reset is under way, framed by a [Common Understanding](#) reached in May 2025. It promises a ‘dedicated dialogue’ on the recognition of professional qualifications. The risk for the UK is that this will be construed as ‘cherry-picking’.

In July the Commission published a [draft mandate](#) dealing specifically with a common sanitary and phytosanitary area (SPS) and the linkage of the EU and UK greenhouse emissions trading systems (CBAM). The fact that the mandate is predicated on dynamic regulatory alignment suggest that mutual recognition of veterinary qualifications is likely. These discussions continue.

Helpfully foreshadowing the EU-UK reset is a [UK-Spain bilateral agreement](#) signed in September. Article 16 promises closer cooperation on education.

In August the UK government published a [pre-tender notice](#), inviting expressions of interest in running a UK national Erasmus+ agency from mid-2026 to end of 2027. In October it said it aimed to associate from the 2027-28 funding round. Uncertain of the outcomes, the Welsh mobility scheme [Taith](#) was extended until 2028. Meanwhile, the EU granted UK institutions access to the Erasmus Charter for Higher Education (ECHE) application portal.

Negotiations on Erasmus+ have now concluded. In the week before Christmas the EU and UK put out a [joint statement](#) announcing “the UK’s association to Erasmus+ in 2027”. Note that this does not say “from 2027”. The agreement covers association for one year only, for which the UK will pay a fee of £570 million – a sum discounted by 30%, according to the UK press, to reflect the UK’s

4 A succinct overview can be viewed on the [Invest Punjab](#) website.

popularity as a student mobility destination. The UK government expects that 100,000 people will benefit, but it will review the situation ten months into implementation.

What happens from 2028 onwards, i.e. in the EU's next multiannual financial framework, will require further negotiation. How far this may be tied in to other deals (a Youth Experience Scheme, SPS, CBAM, UK access to the EU electricity grid), is unclear.

Still, no doubt that this is excellent news, to the benefit of students and citizens in many countries, warmly welcomed by [EUA and Universities UK](#).

7 **To conclude**, there is much hustle and bustle in the landscape of competitiveness.

It's clear that competitiveness is an abstraction, subject to pragmatic realisations which may not marry easily. Seamlessness may be an attractive rhetorical resource, but it guarantees no concrete outcomes.

Only time will tell whether the EU's package of actions can overcome all contingencies and usher in the hoped-for growth, economic security, strategic autonomy, and prosperity.

Higher education is blessed in that its role is to collaborate. This it can do very well.

Comments and corrections are welcome:

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ANNEX A: THE GROUP OF COORDINATORS

The table below displays the topics raised in recent meetings of the Group of Coordinators – member state nominees who liaise with the Commission on the implementation of the Directive. The various agendas and minutes are available [online](#).

| DATE OF MEETING | AGENDA / MINUTES | TOPICS |
|-----------------|--------------------|--|
| October 2024 | Agenda and minutes | <p>A mutual learning session on quality assurance, led by Sweden – QA being an MS competence.</p> <p>The migration of third country nationals is also an MS competence. The Commission committed to a series of bilateral discussions, to determine how labour market needs at EU level might best be coordinated.</p> <p>Doubtless in reaction to the ECA report (see p.6 above), the Group recommended that the practical application and legal interpretation of the Directive should be a standing item on every agenda. The ECA report itself met with divergent views: it was harsh and it was helpful.</p> |
| December 2024 | Agenda and minutes | <p>The Commission announced that the professional qualifications unit would move from DG GROW to DG EMPL on February 1st 2025.</p> <p>The GoC adopted its 2025 work plan which included follow up to the ECA report, the recommendations of which the Commission accepted; consistent application and enforcement of the legal framework in the area of professional qualifications; continuous updating of Directive 2005/36/EC via delegated acts; exploring ways to extend automatic recognition; exploring the potential of digitalisation to improve the efficiency of recognition procedures and recognition of qualifications of third country nationals.</p> <p>The Commission outlined the schedule, procedures and progress of the implementation report on the Directive, to be published in June.</p> <p>Work on a Common Training Framework (CTF) in physiotherapy was ongoing and appeared to be feasible.</p> <p>A report on the Proportionality Directive was adopted in November. Although due to ongoing infringement proceedings it was too early to assess its impact, its problematic elements had become clear.</p> |

| DATE OF MEETING | AGENDA / MINUTES | TOPICS |
|--|---------------------------|---|
| | | <p>In discussion of the Net-Zero Industry Act (NZIA), the Commission listed the four relevant Academies:</p> <p>“ - The Battery Academy was established in 2022, has had 200,000 learners already, has developed about 10 courses from scratch and many updated others.</p> <p>- The Solar Academy was launched in June 2024, training programmes should be available in spring 2025.</p> <p>- The Raw Materials Academy was announced late 2024, training programmes should be available in summer 2025.</p> <p>- Wind and Hydrogen Academies have been announced and could be launched at the end of 2025”</p> <p>The Commission pointed out that these were not educational institutions: they develop learning content to be offered to educational institutions, which may then be delivered as micro-credentials.</p> |
| <p>April 2025, the first meeting to be chaired by DG EMPL</p> | <p>Agenda and minutes</p> | <p>DG EMPL introduced the Union of Skills.</p> <p>On CTFs, the Commission announced that “a study will be launched this year to identify other professions that would be good candidates for a common training framework”. Take-up thus far has been very low, with only hospital pharmacists and physiotherapists showing real interest.</p> <p>The minutes contain a useful list of recent CJEU case law and pending cases.</p> |
| <p>June 2025</p> | <p>Agenda and minutes</p> | <p>The Commission reported that the Skills Portability Initiative (SPI) would address, inter alia, the use of digital tools to facilitate recognition. The Group discussed the AI Proof of Concept of such a tool and heard a presentation on European Digital Credentials.</p> <p>The SPI would also address possible rules for dealing with the qualifications of third country nationals.</p> <p>The meeting touched upon the physiotherapy CTF and the possibility of a recognition agreement with Switzerland.</p> |

| DATE OF MEETING | AGENDA / MINUTES | TOPICS |
|-----------------|--------------------|---|
| October 2025 | Agenda and minutes | <p>There was further discussion of digital tools and their relation to the existing IMI system.</p> <p>Member made suggestions for future CTFs, including healthcare assistants, medical electro-radiology technicians, and construction engineers.</p> <p>The Commission ruled that ‘family medicine’ would not be added to Annex V as a separate medical specialty; it was already covered by provisions on general medical practice.</p> |
| December 2025 | Agenda only | There was to be further discussion of the SPI, CTFs, and follow-up to the ECA report (see page 6 of this briefing). |

ANNEX B: INFRINGEMENT PROCEEDINGS

Infringements may be occasioned by a variety of factors: governments cowed by hostile oppositions, delays in parliamentary or bureaucratic processes, reluctance of regulators to depart from established practices, protectionist postures within the professional bodies. All these factors can cause member states to miss the deadline by which they must transpose EU directives into their national legislation – and/or subsequently to commit breaches.

Displayed below, in order of increasing gravity, are recent developments in the area of recognition.

The table contains examples of action taken following member state non-compliance in the areas of freedom of establishment, proportionality testing, and public procurement – clear evidence of how the competitiveness agenda is expressed in pressure on wayward member states. For a complete list of such infringements, consult the Commission’s [press release](#) site.

Here, at a glance, is a catalogue of infringement proceedings triggered or pursued by the Commission since the autumn of 2024⁵:

| STAGE OF PROCEEDINGS | MONTH | MEMBER STATE(S) | INFRINGEMENT |
|---|--------------|-----------------|---|
| <p>Formal notice</p> <p>Formal notices normally require appropriate member state action within two months.</p> | October 2024 | Luxembourg | <p>Failure to comply with EU rules on freedom of establishment, in respect of an unspecified range of liberal professions.</p> <p>Luxembourg imposes a prior authorisation procedure, conditional <i>inter alia</i> on the physical presence of the senior manager of the enterprise.</p> |

⁵ The table displays a relevant but minuscule sample. The Commission noted in its work programme for 2025 that, at the time of publication, there were 1,500 ongoing infringement cases.

| STAGE OF PROCEEDINGS | MONTH | MEMBER STATE(S) | INFRINGEMENT |
|--|---------------|---|---|
| Formal notice Formal notices normally require appropriate member state action within two months. | October 2024 | Cyprus | Failure to correctly transpose Directive 2005/36/EC on the recognition of professional qualifications, by limiting the recognition of architects with acquired rights. |
| | November 2024 | France | Failure to comply with Articles 45 and 49 of the Treaty on the Functioning of the EU (TFEU), in respect of freedom of establishment and movement of workers. EU doctors, dentists and midwives, who are fully qualified to exercise their profession within the EU, are prevented from working in France, either as self-employed or as employees, if they are already registered to practise their profession in a country outside the EU. |
| | December 2024 | Belgium, Bulgaria, Czechia, Denmark, Germany, Ireland, Greece, Spain, France, Italy, Cyprus, Latvia, Luxembourg, Hungary, Malta, Netherlands, Austria, Poland, Romania, Slovenia, Slovakia, Finland, and Sweden | <p>Failure to comply with the EU professional qualifications rules, by restricting service provision in three sectors in particular: construction, transport and business services.</p> <p>These countries impose additional checks on professionals' qualifications; these checks are excessive and appropriate only for healthcare practitioners.</p> |
| | December 2024 | Hungary | Failure to comply with Article 49 of the TFEU , in respect of freedom of establishment. Hungary has restricted medically assisted reproduction services to state-owned or state-controlled providers and is in breach. |
| | May 2025 | Bulgaria, Czechia, Denmark, Germany, Ireland, Greece, Spain, France, Croatia, Italy, Cyprus, the Netherlands, Poland, and Portugal | <p>Failure to notify measures fully incorporating into national law Directive (EU) 2024/505 on the recognition of professional qualifications of nurses responsible for general care trained in Romania. The transposition deadline was 4 March 2025.</p> <p>[See EUA briefings no.17 (January 2021, para.3.1, and no.22 (January 2024), para.1.21]</p> |

| STAGE OF PROCEEDINGS | MONTH | MEMBER STATE(S) | INFRINGEMENT |
|--|---------------|-----------------|--|
| Formal notice Formal notices normally require appropriate member state action within two months. | June 2025 | Slovenia | Failure to comply with European public procurement rules Directive 2014/24/EU , by exempting public pharmacy institutes from obligatory procurement procedures. |
| | July 2025 | Ireland | Failure to comply with Directive 2006/123/EC on services in the internal market in the context of property services, by imposing unnecessary authorisation and client protection schemes. |
| | December 2025 | Hungary | Failure to comply with the Services Directive in respect of certified translation services. |
| | December 2025 | Italy | Failure to comply with the Services Directive in respect of the multi-disciplinary activities of accountants. |
| Reasoned opinion | October 2024 | Greece | Failure to correctly transpose the Professional Qualifications Directive, in respect of the recognition of qualified career counsellors. Formal notice was issued in April 2023. |
| | February 2025 | Slovenia | Failure to comply with the Services Directive, by restricting the ability of lawyers to advertise their services. |
| | June 2025 | France | Failure to comply with the Services Directive and with Articles 49 and 56 of the TFEU, in respect of the freedom of movement of veterinary companies and veterinarians. The French rules require that a majority of shareholders in a veterinary company be exercising veterinarians within the company in question. They also require veterinarians to be present in each of their establishments at least part-time. This limits the number of veterinary companies a veterinarian can work in. In addition, while French law allows, in principle, for the free provision of services, the practice restricts veterinarians established in other member states from offering their services on a temporary and occasional basis in France. |

| STAGE OF PROCEEDINGS | MONTH | MEMBER STATE(S) | INFRINGEMENT |
|----------------------------------|---------------|----------------------|--|
| Reasoned opinion | July 2025 | Bulgaria | Failure to comply with the Services Directive, by restricting the ability of lawyers to advertise their services. |
| | July 2025 | Belgium and Bulgaria | Failure to correctly transpose the Proportionality Test Directive . |
| Referral to the Court of Justice | October 2025 | Croatia | Failure to ensure free movement of lawyers and law firms. |
| | December 2024 | Bulgaria and Cyprus | Failure to ensure the correct transposition of the Proportionality Test Directive into national legislation, either by omission or by incorrect application. |
| | June 2025 | Germany | Failure to correctly transpose the Public Procurement Directives, in respect of postal services. |
| | July 2025 | Czechia | Failure to ensure the correct transposition of the Proportionality Test Directive into national legislation, by incorrect application. |
| | December 2025 | Bulgaria | Breach of EU public procurement rules in respect of private medical establishments. |

ANNEX C: CANDIDATE COUNTRY REPORTS

These extracts derive from [reports published in November 2025](#). The Commission’s **bolding** has been retained.

Albania

Albania has ratified the agreement on the recognition of professional qualifications for nurses, veterinary surgeons, pharmacists and midwives, signed at the 2023 Berlin summit of the Western Balkan Common Regional Market (CRM). It should “continue its efforts to align its legislation with the EU *acquis* and to ensure appropriate institutional capacity in the area of mutual recognition of professional qualifications”. [p.11] Here the text echoes the 2024 report, no progress having been made in the interim. “Work on the action plan to align the legislation with the [Directive] on transparency and proportionality review is ongoing.” [p.65]

The 2024 report noted that “Albania’s National List of Occupations has been aligned with the European Skills, Competences, Qualifications, and Occupations (ESCO) multilingual classification, allowing for database transfer and connection with the European Network of Employment Services (EURES). [p.64]⁶

⁶ It is worth noting the opening in Tirana of an [office of the European Parliament](#) and a [branch of the College of Europe](#).

“Albania is **between a moderate and good level of preparation** in the field of education and culture. **Some progress** was made with the implementation of the National Strategy for Education 2021-2026 and the adoption of legislative acts to reform higher education. Albania still needs to strengthen the quality and inclusiveness of education. [...]

The Commission’s recommendations from last year were partially implemented and remain mostly valid. In the coming year, Albania should in particular:

- ↳ further optimise the VET system in line with labour market needs;
- ↳ further improve the professional development and training of teachers and trainers, with a focus on (i) pedagogical skills to implement the competence-based inclusive approach and (ii) digitalisation from pre-primary to university levels, including VET education; ... ” [p.15]

“On **higher education**, Albania is a member of the **European Higher Education Area** (Bologna process). As set out in the 2024 Bologna Process Implementation Report, Albania still needs to work on the full implementation of the key commitments, especially with regards to automatic recognition and quality assurance.” [p.77]

Bosnia and Herzegovina

As was the case in 2024, Bosnia and Herzegovina is asked to “align legislation with the EU *acquis* on mutual recognition of professional qualifications, including with the Directive on recognition of professional qualifications and with the Directive on a proportionality test, before regulating any new profession.” [p.11]

“The legislation is not yet aligned with the EU *acquis* and so it does not provide for the **mutual recognition of qualifications for regulated professions** and minimum training requirements for access to certain professions. The national qualifications framework is not yet referenced to the European qualifications framework. The Council of Ministers appointed a contact point on regulated professions. This however is not fully functional as the legislation remains fragmented across the country. A detailed list of regulated professions is also still missing.” [p.68]

“Bosnia and Herzegovina is a member of the European Higher Education Area. On higher education, according to the 2024 Bologna Process implementation report, the country still needs to ensure full implementation of the key commitments, especially with regards to national qualifications frameworks, automatic recognition and quality assurance.” [p.79]

“Bosnia and Herzegovina’s national qualifications framework (NQF) is not yet referenced to the European qualifications framework (EQF), nor is there a mechanism for the validation of prior learning. Cooperation continued between the two accreditation agencies, one at State level and one in the *Republika Srpska* entity. Bosnia and Herzegovina needs to further improve quality assurance in higher education and to intensify accreditation of study programmes with a view to joining the European Association for Quality Assurance (ENQA).” [p.80]

Georgia

“Georgia is not fully aligned with the EU *acquis* on the **mutual recognition of professional qualifications**. The sectoral benchmark defining minimum competencies for qualified nurses was approved in December 2024 to align with Directive 2005/36/EC on the recognition of professional qualifications” [p.61].

“On **higher education**, enrolment increased in 2024 compared to 2023. Georgia has been a full member of the European Higher Education Area (Bologna Process). According to the 2024 Bologna Process implementation report, Georgia still needs to work on the full implementation of the key commitments, such as the Bologna degree structure and automatic recognition. There are 3 higher education institutions from Georgia which participate in the European Universities Alliances as associated partners.

There was significant backsliding in quality assurance in higher education. In November 2024, the membership of the National Centre for Educational Quality Enhancement in the European Association for Quality Assurance in Higher Education (ENQA) was suspended with regard to the institution’s independence and its interpretation and application of authorisation and accreditation standards. Distance education and e-learning in higher and vocational education are part of the curriculum.” [p.70]

Kosovo

“Kosovo is **moderately prepared** and made **limited progress**, notably as regards professional qualifications. However, sectoral laws are still not compliant with the EU Services Directive and Kosovo’s point of single contact (PSC) is not fully functional.

The Commission’s recommendations from last year were partially implemented, and remain largely valid. In the coming year, Kosovo should, in particular:

- ↳ closely monitor the implementation of the latest action plan to render sectoral legislation compliant with the EU Services Directive, and launch a functional and informative PSC; [...]
- ↳ align the legal framework with the EU *acquis* on mutual recognition of professional qualifications, including the Directive on recognition of professional qualifications and the Directive on a proportionality test.” [p.10]

“Some progress has been made in the area of **regulated professions**. A concept document for a draft law on the **recognition of professional qualifications** is pending submission to the government for approval. Additionally, a new act that defines minimum training requirements for professions benefiting from automatic recognition is also under preparation. Universities that award qualifications for these seven sectoral professions have approved revisions to their training programs, and some have started aligning these programs with the Directive on the recognition of professional qualifications. Existing laws regulating these professions have been reviewed for compliance with the EU *acquis* with the help of technical assistance, and a List of Regulated Professions has been published. However, the Division for Regulated Professions within the Ministry of Education remains understaffed and needs strengthening, along with other ministries that serve as competent authorities.” [p.67]

“On **higher education**, in July 2025, the Kosovo Accreditation Agency became a member of the European Quality Assurance Register for Higher education, demonstrating Agency’s quality assurance processes full compliance with the European standards and guidelines.

Kosovo is not a member of the European Higher Education Area (Bologna process). There are three higher education institutions from Kosovo, which participate in the European Universities Alliances as associated partners.

Progress was made in advancing digital education, including through the roll-out of the national platform *Shkollat.org* and the establishment of a Department of Technology and Digitalisation at the Ministry of Education. However, digital literacy in Kosovo remains well below the EU standards and gaps remain in teacher training, connectivity, and access to devices, particularly for children from disadvantaged groups. Sustained investment and stronger governance are needed to align digital education reforms with EU priorities on inclusion, employability, and the green and digital transitions.” [p.80]

Moldova

“The Commission’s recommendations from last year were partially implemented and remain valid. In the coming year, Moldova should, in particular:

- ↳ align its legal framework with the Directive on the recognition of professional qualifications, especially with the minimum training requirements for professions benefiting from automatic recognition;
- ↳ align national legislation with the Proportionality Test Directive;
- ↳ align national sectoral legislation with the EU Services Directive.” [p.11]

“Moldova has partially aligned its legislation with the EU Directive on the recognition of professional qualifications and agreed to the CEFTA decision to facilitate trade in services provided by travel agencies and tour operators. In July 2025, the Government set minimum training and evaluation requirements for accreditation of key higher education and vocational programmes in health-related programmes and architecture. The Ministry of Education and Research issued 17 orders updating healthcare qualification standards in line with the National Qualifications Framework.” [p.69]

“A roadmap for the operationalisation of the **national qualifications framework (2023-2027)** is in place. As a member of the Advisory Group of the European Qualifications Framework (EQF), Moldova has started to prepare to reference its National Qualifications Framework (NQF) to the EQF.

In the field of **higher education**, the country has made significant progress on key European Higher Education Area commitments. Moldova is a member of the European Higher Education Area (Bologna process) where it continued its active participation. Further efforts are needed on the full implementation of the key commitments of the Bologna Process, especially with regards to automatic recognition and external quality assurance. There are three higher education institutions from Moldova which participate in the European Universities Alliances as associated partners.” [p.84]

Montenegro

“On **mutual recognition of professional qualifications**, Montenegro continued aligning with the Directive 2005/36/EC on the recognition of professional qualifications as amended, with a special focus on the minimum training requirements *acquis* concerning seven professions and over 55 medical and dental specialties benefiting from the automatic recognition in line with directive 2005/36/EC. To that end, in July 2025, Montenegro adopted a number of sectorial Laws and related rulebooks namely, the Law on healthcare protection, amendments to the veterinary Law and amendments to the Law on spatial planning and construction of structures facilities. Subsequent legislative amendments on healthcare were also adopted in October. Work is ongoing to align the study training programmes for five professions (doctors with basic medical training, dental practitioners,

architects, general care nurses and pharmacists) with the Minimum Training Requirements of Directive 2005/36/EC. In May 2025, the government revised and adopted a new list of regulated professions: 129 professions are now regulated in Montenegro. Progress was registered revoking nationality requirements, and in July 2025, several Laws were amended and adopted to that end.

Montenegro should step up efforts to strengthen institutional capacity. This includes establishing the organisational structure and training the competent authorities handling the recognition of professional qualifications. By accession, Montenegro should ensure that a verification system or training models are in place to ensure that the necessary verification is made when assessing applications for recognition of midwives and veterinary surgeons from EU countries (under the general system of Directive 2005/36/EC) and when assessing applications from non-EU countries under national procedures. Efforts to ensure harmonisation with the minimum training requirements of all professions benefitting from automatic recognition should continue.

Montenegro is currently working on amendments to the Law on the recognition of professional qualifications for regulated professions to align with the proportionality test Directive.” [pp.75-76]

“The strategy on **higher education** recognises the need for better alignment of study programmes with the needs of the labour market, adequate recognition of higher education qualifications and improvement of infrastructure. Furthermore, the strategy underlines the necessity to improve the higher education system in accordance with European Higher Education Area (Bologna process) and European Research Area standards and to strengthen the role of institutions of higher education on the international level. On higher education, according to the 2024 Bologna Process implementation report, Montenegro still needs to work on the full implementation of the key commitments, especially with regards to system level automatic recognition for academic purposes as well as quality assurance. The implementation of the Bologna tools and commitments are key to strengthen higher education in Europe and to foster transnational higher education cooperation. EU policies in higher education build upon, and work in synergy with the Bologna process. Its full implementation is therefore central to achieve the European Education Area in higher education. One Montenegrin university participates in European Universities alliances.” [p.87]

North Macedonia

“On the right of establishment and the freedom to provide services, North Macedonia is **moderately prepared**. It made **limited progress**, notably through continuing to align sectoral legislation with the Services Directive.

The Commission’s recommendations from last year were not implemented and therefore remain valid. In the coming year, North Macedonia should in particular:

- ↳ intensify the implementation of the 2024-2026 Action plan to address non-compliance of listed sectoral laws with the Law on services by adopting cross-sector amendments; [...]
- ↳ align with the EU *acquis* on mutual recognition of professional qualifications, in particular the amended Directive on recognition of professional qualifications and the Directive on a proportionality test before adoption of new regulation of professions.” [pp.10-11]

“On the **mutual recognition of professional qualifications**, Parliament ratified the Agreement under CEFTA on mutual recognition of professional qualifications for nurses, veterinary surgeons, pharmacists and midwives. North Macedonia needs to intensify efforts to fully align with the Directive on the recognition of professional qualifications especially with the minimum training requirements

for professions benefiting from automatic recognition and to set up a transparent electronic register of all regulated professions. The institutional capacity of the Ministry of Education and Science's unit dealing with the mutual recognition of professional qualifications remains insufficient." [p.68]

"On **higher education**, in the academic year 2024/2025, a total of 53 535 students were enrolled, which represents an increase of 2.33%. Female students represent 59.3%. The majority of students (76.8 %) are enrolled in public higher education institutions, while 23.2 % are enrolled in private institutions. The main challenge remains the improvement of quality of higher education through the development of accreditation and quality assurance processes. North Macedonia is a member of the European Higher Education Area (Bologna process) and needs to work on the full implementation of the key commitments according to the 2024 Bologna Process implementation report, especially with regards to automatic recognition and quality assurance. Three universities from North Macedonia participate in European Universities alliances.

A new law on the **national qualifications framework** (NQF) was adopted in December 2024. Out of 16 sectoral committees, 14 have been established. A manual for adapting qualifications in VET to the European Qualifications Framework (EQF) and NQF was drawn up, and 10 qualification standards were adopted.

The Law for **adult education** was adopted in December 2024, followed by the Concept of the Adult Education, formalising the system of validation of non-formal and informal learning. An Adult Education Strategy (2025-2030) was adopted in March 2025." [p.80]

Serbia

"The Commission's recommendations from last year were partially implemented. In the coming year, Serbia should in particular:

- ↳ further align its horizontal law on services with the EU Services Directive, advance harmonisation of sectoral laws with the horizontal law and the EU *acquis*, and create a portal for the point of single contact providing online information for service providers, including all relevant administrative procedures; [...]
- ↳ continue aligning with the EU *acquis* on the mutual recognition of professional qualifications, including the directives on the recognition of professional qualifications and on a proportionality test." [p.11]

"In the field of **mutual recognition of professional qualifications**, national legislation is broadly aligned with the EU *acquis*. Serbia needs to fully align with the Professional Qualifications Directive, and the Proportionality Test Directive as well as further harmonise relevant sectoral legislation. On the mutual recognition of professional qualifications for nurses, veterinary surgeons, pharmacists and midwives, Serbia ratified the CEFTA agreement in September 2024. Certain regulated professions still have nationality requirement for access. A preliminary list of 50 regulated professions is pending adoption but does not contain all seven sectoral professions which benefit from automatic recognition under the Directive." [p.76]

"Serbia is a member of the European Higher Education Area (Bologna process). Three Serbian universities participate in European Universities alliances. Amendments to the Law on Higher Education which brought in the possibility of micro credentials should be fully operationalised to facilitate additional lifelong learning opportunities. Lifelong learning participation decreased to 5.5% in 2024 (6.1% in 2023).

On quality assurance in higher education, no progress was made in the implementation of recommendations of the European Association for Quality Assurance in Higher Education (ENQA). An application for renewed membership in ENQA has yet to be submitted by the National Accreditation Body after its suspension in 2020. First qualification standards for higher education have been developed but are yet to be linked with quality assurance procedures. The attainment of tertiary level qualifications for people aged 25-34 slightly increased to 37.2% in 2024 (34.7% in 2023), significantly below the 2030 EU target of 45%.

Measures to reduce drop-out rates and segregation need to be enforced focusing also on the inclusion of women and girls in education and training.” [p.88]

“The Commission’s recommendations from last year were partially implemented. In the coming year, Serbia should in particular: [...]

- ↳ ensure that the policy and institutional framework for quality assurance in higher education fully complies with the recommendations of the European Association for Quality Assurance in Higher Education.” [pp.15-16]

Türkiye

“Türkiye remains at an **early stage of preparation** on the right of establishment and freedom to provide services. **No progress** was made during the reporting period. Overall, substantial efforts are still required to achieve alignment in this area.

The Commission’s recommendations from last year were not implemented, and therefore remain valid. In the coming year, Türkiye should in particular:

- ↳ align national legislation with the Services Directive and set up a point of single contact; [...]
- ↳ align national legislation with the EU *acquis* on mutual recognition of professional qualifications, including the Professional Qualifications Directive and the Proportionality Test Directive.” [p.9]

“On **mutual recognition of professional qualifications**, the Vocational Qualifications Authority (VQA) continued to implement the national qualification framework. Türkiye has drawn up a list of 341 regulated professions. However, in accordance with national legislation, certain professions require additional mandatory certification from the VQA beyond the recognition of professional qualifications which contradict the *acquis*. As of April 2025, the number of occupations requiring certification remains at 204, while the number of national occupational standards increased to 925 and 691 national qualifications were aligned with these standards. Türkiye distinguishes between the recognition of qualifications for academic purposes and the recognition of professional qualifications for access to regulated professions, in line with the *acquis*. The Turkish Referencing Report to the European Qualifications Framework is not updated. It is possible to apply online for the recognition and equivalence of higher education qualifications. However, some regulated professions remain reserved for Turkish nationals, and language requirements for access to certain professions have not been removed. Türkiye also needs to intensify its efforts in the alignment with the minimum training requirements for seven sectoral professions (medical doctors, dental practitioners, nurses responsible for general care, midwives, pharmacists, veterinary surgeons, and architects). Continuous and significant steps are needed to align national legislation with the EU *acquis* in this area.” [p.69]

“Türkiye is **moderately prepared** on education and culture. **Some progress** was made during the reporting period, notably regarding the vocational education and national qualifications systems.

The Commission's recommendations from last year were only partially implemented, and therefore remain valid. In the coming year, Türkiye should in particular: [...]

- ↳ ensure the good functioning of the Turkish Qualifications Framework and the Turkish Higher Education Quality Council” [p.13]

“On **higher education**, Türkiye remains at an advanced stage of implementing the Bologna process, although significant quality differences persist among Türkiye's 208 higher education institutions. According to the 2024 Bologna Process implementation report, Türkiye still needs to work on the full implementation of the key commitments, especially regarding degree structures, where some programmes exist outside the agreed Bologna model. The Turkish Higher Education Quality Council, which is a member of the European Association for Quality Assurance in Higher Education (ENQA) board, is awaiting a renewal of its ENQA membership and the European Quality Assurance Register for Higher Education (EQAR) registration. Five universities from Türkiye participate in European Universities alliances. According to the report on Scholar at Risk published in October 2024, Türkiye now ranks in the bottom 10% of states worldwide for respect for academic freedom. In July 2025, Türkiye adopted a law reaffirming the president's sole prerogative to appoint rectors of both public and foundation universities. This raises concerns in terms of university autonomy in Türkiye.” [p.84]

Ukraine

“The Commission's recommendations from last year were partially implemented and remain valid. In the coming year, Ukraine should in particular:

- ↳ take measures to eliminate barriers to the provision of services between the EU and Ukraine, using the possibilities offered by the Association Agreement, and initiate alignment with the EU Services Directive; [...]
- ↳ make progress on aligning with the EU *acquis* on the mutual recognition of professional qualifications.” [p.12]

“Further efforts are needed to align with the **mutual recognition of professional qualifications**, particularly with the Directive on the recognition of professional qualifications and the minimum training requirements for professions benefiting from the automatic recognition, the directives on the free movement of lawyers and the Directive on a proportionality test before adoption of new regulation of professions. No agreement for mutual recognition of professional qualifications currently exists with the EU.” [p.72]

“On higher education, in October 2024, Ukraine adopted a resolution on the awarding of professional qualifications by higher education institutions if professional standards are absent. Ukraine has adopted the strategy for the development of higher education but has yet to adopt its operational implementation plan for 2025-2028. Currently, 35 higher education institutions from Ukraine participate in the European Universities Alliances as associated partners. Ukraine is encouraged to apply fully key commitments under the Bologna Process, notably in quality assurance.” [p.85]⁷

⁷ The European Parliament has opened an [office in Kyiv](#).

The European University Association (EUA) is the representative organisation of universities and national rectors' conferences in 49 European countries. EUA plays a crucial role in the Bologna Process and in influencing EU policies on higher education, research and innovation. Thanks to its interaction with a range of other European and international organisations, EUA ensures that the voice of European universities is heard wherever decisions are being taken that will impact their activities.

The Association provides unique expertise in higher education and research as well as a forum for exchange of ideas and good practice among universities. The results of EUA's work are made available to members and stakeholders through conferences, seminars, websites and publications.