



Addition to the
ECEC Position on the European Commission's Proposal for a
Directive amending Directive 2005/36/EC on the recognition of professional
qualifications - COM (2011) 883 final

Qualification levels (Art 11) and Conditions for recognition (Art 13):

As the European Commission has clarified in the meantime that the meaning of Article 13 (4) can **NOT** be understood in the way that for professions for which a post –secondary level degree /University degree (level Art 11 (d) or (e)) is nationally required it is possible to refuse access and pursuit of a profession if this level is not fulfilled by the applicant. In such a case the access can only be refused if the qualification level of the applicant is in level Art. 11 (a), meaning e.g. people with only professional experience. All other applicants, even with considerably lower qualification level than the nationally required University degree can get access to the profession and pursue it in the host country.

The ECEC would therefore like to express its concern in view to this regulation and the abolition of the current Art 13 (1) b). Such a regulation makes it almost impossible to keep up a certain quality level for professions like chartered Engineers, which provide services in the public interest that have great influence on quality of life and health and safety of people.

Such a regulation leads to a complete erosion of high level academic educations and high qualified professions on national level. The host country should not be forced to lower quality assurance levels so considerably.

Additionally the regulation gives way to false expectations for the applicants. In practise they will be confronted with massive - justified - compensation measures. This means that the effect that the European Commission is obviously expecting will be very little if existend at all.

Due to such extrem differnces in the education/quality levels it will not be possible to see the profession of the applicant and the profession in the host country as the same profession.

In consideration of the neglectable positive and huge negative effects of such a change in the directive we would urgently ask the European Commission / the European Parliament / the European Council to foresee/keep up at least a regulations like the current Art 13 (1) b) saying that the level of the applicant must be at least directly below the level required in the host country