360° labour market: Challenges and solutions for recognising professional qualifications in cross-border regions

ITEM Cross-Border Impact Assessment 2025

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1. Introduction

In border regions, professionals frequently cross borders for work, as the labour market opportunities can expand significantly with a 'Euregional 360-degree' perspective. This dynamic also applies to businesses and institutions in these regions, which may seek to hire workers from neighbouring areas. This is to access a wider pool of qualified workers, also in response to the skills and labour shortages faced across the EU, driven by demographic changes and the increasing demand for skilled workers.[1] However, starting work in a Member State other than the one where a person was trained is not always straightforward. In regulated fields such as healthcare and education, professionals must often have their qualifications formally recognised before working, as authorities require compliance with specific training and competence standards. At the EU level, this recognition process is governed by Directive 2005/36/EC, as modernised by 2013/55/EU. The Directive aims to facilitate labour mobility by ensuring that professionals qualified in one Member State can access and pursue the same profession in another Member State with the same rights as nationals, thereby supporting the free movement of persons and services in the EU.[2] However, the recognition of professional qualifications has still been reported as one for the main obstacles to labour mobility and a barrier to the effective functioning of the EU single market.[3]

Indeed, a study (a Cross-Border Impact Assessment) carried out by ITEM in 2016 revealed that despite the existence of a common EU framework for recognition of professional qualifications, several obstacles are experienced in cross-border regions. For example, the recognition process can be time-consuming for cross-border workers, imposing significant administrative burdens and, in some cases, leading to the rejection of recognition in the neighbouring countries on the grounds of "substantial differences".[4] A recent assessment of the Directive by the European Court of Auditors has also highlighted several challenges: the Directive has not yet been fully implemented in all Member States, and measures such as electronic procedures are not fully utilised. Examples of non-compliance were also identified, such as some authorities requiring additional documents and conducting more checks than the Directive allows for.[5] The European Commission is currently evaluating the Directive, with results expected by the end of 2025.

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[1] 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, Brussels, 5.3.2025 (COM(2025) 90 final), accessed via: https://commission.europa.eu/topics/eu-competitiveness/union-skills_en.

[2] Directive 2005/36/EC, as modernised by 2013/55/EU (OJ L 255 30.9.2005, p. 22).

[3] European Commission: Directorate-General for Employment, Social Affairs and Inclusion, ECORYS, Curtarelli, M., Donlevy, V., McCoshan, A. et al., Study on obstacles to recognition of skills and qualifications – Final report, Publications Office, 2017, accessed via: https://op.europa.eu/en/publication-detail/-/publication/156689fd-e922-11e6-ad7c-01aa75ed71a1/language-en, European Commission: Directorate-General for Regional and Urban Policy, Overcoming obstacles in border regions – Summary report on the online public consultation, 21 September – 21 December 2015, Publications Office, 2016, accessed via: https://data.europa.eu/doi/10.2776/859395, Communication from the Commission to the Council and the European Parliament - Boosting growth and cohesion in EU border regions (COM(2017) 534 final/2).

[4] ITEM Cross-border Impact Assessment 2016, Dossier 2: Recognition of Professional Qualifications, accessed via: https://crossborderitem.eu/publicaties/grenseffectenrapportage-2016-dossier-2-erkenning-van-beroepskwalificaties/

[5] European Court of Auditors Special report 10/2024: The recognition of professional qualifications in the EU – An essential mechanism, but used sparsely and inconsistently, accessed via: https://www.eca.europa.eu/en/publications/SR-2024-10&od=1

Against the backdrop of labour shortages and skills mismatches, the EU has launched several initiatives to ease recognition of professional qualifications. These efforts build on the European Education Area, the Skills Union, and proposals for a 'fifth freedom' of education, research, and innovation – seeking to improve mobility, reduce fragmentation, and better align skills with labour market needs.[6] While education and training remain a Member State competence, in Europe several measures have been taken to support (academic) recognition, such as the Lisbon Recognition Convention, the European Qualifications Framework, ECTS, and Europass, which promote transferability and transparency of qualifications.[7] Regional initiatives have also driven progress in this area, with the recognition of professional qualifications being a key political priority for the Benelux Union, an intergovernmental partnership between Belgium, the Netherlands, and Luxembourg. While automatic recognition has been agreed for higher education diplomas in the Benelux area, no such agreement yet exists for professional qualifications. Still, progress has been made. For instance, in 2018, the ministers signed a Directive on the transferability of professional qualifications, supported by a political declaration from Germany (North Rhine-Westphalia), with the shared goal of simplifying recognition procedures and promoting cross-border mobility.[8] The governments of the respective States, Regions, and Communities have now included this issue in both the Benelux 2025 annual plan and the 2025–2028 multiannual plan, and it has been confirmed as a political priority of the 2025 Luxembourg Presidency.[9]

These developments underscore the need for an update to the ITEM study, nearly a decade after its initial assessment and after the modernised Directive 2013/55 entered into force. Through an analysis of existing obstacles and implementation reports of the Directive, a survey sent to citizens and institutions in border regions to gather their experiences, and statistics on mobility and recognition, the study will focus on evaluating the challenges and solutions for facilitating the recognition of qualifications in the cross-border regions between the Benelux countries (Belgium, Luxembourg, and the Netherlands), as well as Germany and France. The objective of this study is to gain updated insights from the perspective of cross-border regions into the obstacles that still play a role in border regions for both employers and employees, and to collect examples of best practises on how to overcome them.

1.1 Objectives & Method

Ex-post evaluation

This study will contribute to the 'ex-post' mapping of cross-border effects of existing policies and legislation, mainly that of the Directive 2005/36 on recognition of professional qualifications. Focus will be therefore on recognition of professional qualifications of regulated professions for the purposes of accessing labour market, however some of the findings may also be applicable to the recognition of non-regulated professions as well as academic recognition.

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[6] See report of Enrico Letta, 'Much more than a market: Empowering the Single Market to deliver a sustainable future and prosperity for all EU Citizens', April 2024, accessed via: https://www.consilium.europa.eu/media/ny3j24sm/much-more-than-a-market-report-by-enrico-letta.pdf

[7] Find more information on these measures: https://europass.europa.eu/en

[8] Directive of the Benelux Committee of Ministers on the transferability of professional qualifications, M (2018) 6

[9] See Benelux Union Annual plan 2025: cooperation without borders - implementation of the common action plan 2025-2028, accessed via: https://www.benelux.int/wp-content/uploads/2025/02/Jaarplan2025-DEF_DTP_CZF_EN_LS.pdf

Geographical demarcation

This study will focus on (cross-)border regions between the Benelux countries (the Netherlands, Belgium, Luxembourg), as well as Germany and France. While this study will focus on cross-border territory, it should be noted that the legal situation (rule applicable on the recognition of qualifications) are also appliable in a transnational context, i.e. not only for cross-border workers in cross-border regions, but also those exercising intra-EU mobility. However, still specific attention will be paid to the mobility in cross-border regions. Although this study focuses on selected countries, its findings may also be relevant to other EU Member States and (cross-)border regions, as they make the use of the same EU Directive.

Research method

With the ITEM Cross-Border Impact Assessment methodology[10], the research method combines desk research, survey data, and (a brief) statistical analysis. First, desk-based research will be carried out, reviewing reports on the recognition of professional qualifications both in the EU level and in (cross-)border regions, with particular attention to obstacles faced by both citizens and institutions or businesses. Second, these findings were updated through a survey. The survey targeted institutions and businesses with experience in hiring professionals across borders or advising on cross-border work and recognition procedures, as well as individuals who are working or planning to work across borders who had undergone recognition processes in another country. Third, statistics on recognition decisions were analysed to provide insight into mobility flows and to identify country pairs where recognition remains challenging. Finally, examples of best practices were collected through desk research, complemented by expertise gained and exchanges carried out by the author in their professional work in this field at ITEM and at the Benelux Union Secretary-General.

The Research Themes, Principles, Benchmarks and Indicators of the Study

The study covers the evaluation of the three research themes (see Table 1). Under the theme European Integration, the study studies the cross-border impact of EU Directive 2005/36 on recognition of professional qualifications, namely what obstacles remain for citizens and institutions as well as businesses/service providers in cross-border regions. Under the theme Sustainable Development/Socio-Economic Development, the study explores the establishment of services in cross-border regions. Key aspects include strengthening of regional economies, hiring of employees, and employment opportunities in border areas. It further considers whether services can be established in the same way in cross-border regions as in national centres, and to what extent workers can effectively access the (cross-border) labour market. Under the theme Euregional Cohesion, the study investigates the concept of a 360-degree cross-border labour market. Attention is given to forms of cross-border cooperation, initiatives, and best practices, and to how these can facilitate the recognition of professional qualifications and help address the obstacles identified in cross-border regions.

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[10] Find all ITEM Cross-Border Impact Assessments, as well as publications on the methodology, here: https://crossborderitem.eu/en/cross-border-impact-assessments/

Table 1: Research themes, principles, benchmarks, and indicators for assessing the cross-border effects of EU Directive 2005/36

Theme	Principles	Benchmarks	Indicator
European Integration	Free movement of persons and services Art. 21 TFEU, Art. 56 TFEU The principle of mutual recognition EU Directive 2005/36	Persons can freely move and work in the EU Qualifications are recognised between EU Member States Recognition process without substantial hinderances	What obstacles are experienced in relation to recognition of professional qualifications and labour mobility in cross-border regions? Worker in a cross-border region vs. worker in national situation
Sustainable Development/Socio-Economic Development	Internal market, Art. 114 TFEU 360° labour market Establishing services at border regions, optimal allocation of resources and strengthening economies of border regions Employment opportunities in cross-border regions	Services can be established same way in border regions/national centers Workers can effectively access the cross-border labour market	What kind of joint services are (wanted to be) established at cross-border regions? Statistics of mobility and recognition decisions
Euregional Cohesion	Strengthening economic, social, and territorial cohesion Art. 174 TFEU Mutual assistance and cooperation between Member States Art. 4(3) TEU	Cross-border cooperation in education, training, recognition of professional qualifications	What kind of cross-border cooperation, initiatives and best practises can be identified? How can they facilitate the recognition of professional qualifications and solve the obstacles identified?

2. The EU Directive 2005/36 on recognition of professional qualifications in brief

To safeguard the free movement of persons and services within the EU's internal market, the EU has issued Directives on the mutual recognition of professional qualifications. These ensure that EU citizens who obtained their qualifications in one Member State can access and practise the same profession in another Member State with the same rights as nationals.[11] The Directive 2005/36 consolidates and modernises previously fragmented rules per profession, bringing them together into a single, simplified legal framework, by harmonising the procedures for recognition of professional qualifications in the EU.[12] The Directive applies to all regulated professions: professions for which

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[11] Directive 2005/36, as modernised by 2013/55 (OJ L 255 30.9.2005, p. 22).

[12] Although the Directive applies to all regulated professions, special provisions remain in place for certain professions that are subject to separate systems, such as lawyers, auditors, and insurance intermediaries. See overview: https://single-market-economy.ec.europa.eu/single-market/services/free-movement-professionals/recognition-professional-qualifications-practice/professions-falling-under-specific-legislation_en

qualification requirements are laid down by law.[13] This means that certain professions and their professional titles are protected, and individuals must meet the required standards to be permitted to practise them in another Member State.

The Directive has two systems, namely the 'automatic' recognition system and the 'general' system for recognition. The automatic recognition system applies to professions for which both the recognition process and certain elements of training are harmonised across the EU. This includes seven sectoral professions (nurses, midwives, doctors, dentists, pharmacists, architects, veterinary surgeons, as laid down in Annex V)[14], professions subject to recognition based on professional experience (professions of trade and industry, Annex IV)[15] and professions for which common training principles are established (a system introduced with the 2013 amendment of the Directive)[16]. Automatic recognition in this context means that these professionals are subject to a recognition procedure, but the procedure does not involve an in-depth evaluation of the applicants' qualifications, but rather a check from the authorities to determine whether the applicants' qualifications meet the minimum requirements set out in the Directive.

The other system is the general recognition system, which applies to most professions whose education and training are not (yet) harmonised, and therefore do not benefit from automatic recognition.[17] Under this system, the competent authorities compare the obtained qualifications from the home Member State with those required in the host Member State. Central in this procedure is the principle of mutual recognition[18], entailing that Member States must take into account all evidence on qualifications (diplomas, certificates and other relevant evidence on the applicants' competences) obtained in another Member State, and if they correspond to the qualifications in that Member State, they are obliged to recognise them. If, during this evaluation, the authorities identify substantial differences, it is possible that they will impose compensation measures, the fulfilment of which will allow the professional to obtain recognition. Thus, even when differences exist in the content of training among the Member States, recognition may not, in principle, be refused, but the applicant may be required to complete compensatory measures that fulfil the missing knowledge or competences. As specified by the Directive, such measures can take the form of an aptitude test (exam), or an aptitude period (training) for a maximum duration of three years.[19]

Another distinction in the procedures under the Directive can be made between establishment on the one hand and temporary service provision on the other. The procedure on recognition of qualifications described above entails a situation where the professional wishes to permanently establish themselves in another Member State. However, under the Directive, it is also possible to provide services on a temporary basis without having to go through an in-depth recognition procedure. Whether the practice of a profession is temporary and occasional in nature, is determined on an individual, case-by-case basis. The duration, frequency, regularity, and continuity of the service provision become

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[13] Arts. 1 and 3(1)(a) Directive 2005/36.
[14] Art. 21 Directive 2005/36.
[15] Art. 16-20 Directive 2005/36.
[16] Art. 49a, 49b Directive 2005/36.
[17] Arts. 10-14 Directive 2005/36.
[18] Case C-340/89 Vlassopoulou, EU:C:1991:193, §16
[19] Art. 14 Directive 2005/36.

relevant in this evaluation. Nevertheless, although the rules governing the provision of temporary services are typically more flexible than those governing the permanent establishment of a professional, a formal procedure must still be followed. Before providing the service for the first time, the host Member State may require the professional to submit a declaration. In case the profession poses a risk to public health or safety, the authorities may check the qualifications of the service provider.[20]

In addition to the system of temporary service provision, another mechanism provided by the Directive is the possibility to obtain partial access to a professional activity. Since in some cases the same profession in one Member State may include a larger scope of activities than in the other Member State, the authorities may grant the professional partial access to exercise that profession on a case-by-case basis. This is the case when the person is fully qualified in their home Member State in the professional activity for which they seek recognition, and when the differences of the profession in the two respective states are so large, that the recognition procedure would conclude in compensation measures that would amount to requiring the applicant to complete a full programme of education and training.[21]

Within these systems, the Directive provides procedural guarantees by setting clear time limits for decision-making: two to three months for recognition under the automatic system and three to four months under the general system,[22] as well as other procedural rights such as the rights to appeal. The Directive also specifies that applicants may be required to fulfil other requirements before access to the labour market is granted, for instance demonstrating proficiency of language necessary for practising the profession in the host Member State.[23]

Next to the harmonised procedures on recognition of professional qualifications, the Directive when amended in 2013 also established electronic systems for administrative cooperation and information exchange between the authorities, namely the use European Professional Card (EPC) and the use of Internal Market Information System (IMI system)[24], as well as an alert mechanism. The EPC is essentially an electronic certificate used to apply for recognition, currently only available for five professions.[25] The alert mechanisms is used between the authorities to warn each other about professionals who have been prohibited or restricted from practicing the profession in one country or have used falsified diplomas in their applications.[26]

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[20] Arts. 5-9 Directive 2005/36.

[21] Art. 4f Directive 2005/36.

[22] Art. 51 Directive 2005/36.

[23] Art. 53 Directive 2005/36.

[24] Art. 57, 57a Directive 2005/36.

[25] Art. 4a-e Directive 2005/36.

[26] Art. 56(a) Directive 2005/36.

3. Obstacles to recognition of qualifications in (cross-)border regions

This chapter will first examine the obstacles to the recognition of professional qualifications in cross-border regions, as identified by previous research for both citizens and institutions/service providers. It will then update this overview by discussing the results of the recent ITEM survey, conducted in March 2025, which collected insights into experiences in cross-border regions.

3.1 Previously reported obstacles on the recognition of professional qualifications

Long duration to obtain recognition

In 2016, ITEM carried out a Cross-Border Impact Assessment on the cross-border effects of Directive 2005/36 as modernised by Directive 2013/55. The study concluded that while negative border effects seem to be limited in legal sense, in practise there are still many obstacles encountered. The identified negative border effects mainly related to the length of the recognition procedures. It was found that the length of this procedure can hinder cross-border employment that pursuant to the Directive should take three to four months. While a person relocating within the EU may be able to wait a few months for a recognition decision, such delays may place (cross-border) workers at a disadvantage in the labour market of cross-border regions. When employers need to fill positions quickly, they are might have a preference to hire workers from their country if recognition procedures for professionals applying from across the border take too long. Accelerating these procedures is therefore key to enabling cross-border workers to access the neighbouring labour markets. Also, recent graduates may face obstacles since the procedure can last up for 4 months but the procedure can only be initiated when documents required for the application, including diploma, have been obtained. Another obstacle regarding the length of recognition procedures is the outcome of the decision. In case authorities identify that the applicant lacks certain skills or training required for the profession, they may impose that the applicant must undergo additional training before recognition is granted. [27] As noted in Chapter 2, the compensation measure imposed as additional training (aptitude period) can indeed take up to three years. It is evident that requiring a citizen to complete up to three years of additional training (despite having already been qualified in their home Member State and, in many cases, have already years of professional experience) discourages cross-border mobility and creates barriers for employers seeking to hire workers from across the border.[28]

Lack of harmonisation: differences among education and training systems

Although the recognition of professional qualifications has been harmonised through Directive 2005/36, only a relatively small number of professions (such as the seven sectoral professions) benefit from automatic recognition. This is a result of varying education and training systems across the EU countries, as the Member States remain competent in these fields. As a result, most professions fall under the general recognition procedure, which influences both the type and duration of the process. Owing to the lack of harmonisation, significant differences may exist between countries (including the

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[27] ITEM Cross-border Impact Assessment 2016, Dossier 2: Recognition of Professional Qualifications, accessed via: https://crossborderitem.eu/publicaties/grenseffectenrapportage-2016-dossier-2-erkenning-van-beroepskwalificaties/.

[28] See also: European Commission: Directorate-General for Employment, Social Affairs and Inclusion, ECORYS, Curtarelli, M., Donlevy, V., McCoshan, A. et al., Study on obstacles to recognition of skills and qualifications – Final report, Publications Office, 2017, accessed via: https://op.europa.eu/en/publication-detail/-/publication/156689fd-e922-11e6-ad7c-01aa75ed71a1/language-en

countries examined in this report: the Netherlands, Germany, France, Luxembourg and Belgium) regarding how a given profession is regulated, as well as the content and length of the required education and training. A lack of clarity and transparency regarding these differences in training and education requirements for professions also poses a problem.[29] These discrepancies can lead to compensation measures, meaning that professionals may be required to undertake additional training, as noted in the previous section. Furthermore, although certain professions such as doctors and nurses benefit from automatic recognition, not all specialisations are (automatically) recognised or regulated in every country. As a result, applicants may face a more complex two-step procedure, where the basic qualification is recognised automatically, but the recognition of the specialisation must go through the general system. For medical specialists, the directive requires a two-step procedure, which can extend the length of the administrative process before recognition and registration in the professional registry: first the recognition of the basic medical qualification, and second the recognition of the specialist qualification.[30]

The Task Force Frontaliers/Grensgänger in the Greater Region (hereinafter, "Task Force Frontaliers") has indeed underlined the importance of mutual trust between countries in their education and training systems. Despite the close cooperation within the Greater Region, there remains a lack of trust in each other's training systems. Strengthening this trust would make equivalence more widely acknowledged and could pave the way towards smoother recognition procedures.[31] Also other reports refer to the importance of mutual trust, shared knowledge, and effective information exchange between authorities.[32] To strengthen mutual trust, enhanced bilateral exchange of training content is considered essential. A clearer understanding of each other's training systems, along with a shared definition of their differences, would make it easier to bridge these gaps.[33] Indeed, research on the German-Dutch border region shows that problems with recognition often stem from limited knowledge of training programmes in the neighbouring country. It also identifies the recognition of professional, including vocational, qualifications as one of the main barriers to cross-border labour mobility between Germany and the Netherlands.[34]

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[29] See also: J. Snijders, L. de Haan, Easing legal and administrative obstacles in EU border regions, 'Case Study No. 9 Labour mobility Obstacles in the recognition of professional qualifications (Germany – Luxembourg – France – Belgium)', February 2017, accessed via: https://ec.europa.eu/regional_policy/en/information/publications/studies/2017/easing-legal-and-administrative-obstacles-in-eu-border-regions

[30] Art. 25(1) Directive 2005/36.

[31] Task Force Frontaliers of the Greater Region 2.0, 'Transposition to the Greater Region Directive (EC) on the recognition of professional qualifications – Inventory', 2018, accessed via: https://www.granderegion.net/fr/ia_publication/transposition-dans-la-grande-region-de-la-directive-ce-relative-a-la-reconnaissance-des-qualifications-professionnelles/

[32] J. Snijders, L. de Haan, Easing legal and administrative obstacles in EU border regions, 'Case Study No. 9 Labour mobility Obstacles in the recognition of professional qualifications (Germany – Luxembourg – France – Belgium)', February 2017, accessed via: https://ec.europa.eu/regional_policy/en/information/publications/studies/2017/easing-legal-and-administrative-obstacles-in-eu-border-regions

[33] Task Force Frontaliers of the Greater Region 2.0, 'Transposition to the Greater Region Directive (EC) on the recognition of professional qualifications – Inventory', 2018, accessed via: https://www.granderegion.net/fr/ia_publication/transposition-dans-la-grande-region-de-la-directive-ce-relative-a-la-reconnaissance-des-qualifications-professionnelles/

[34] Lambert Teerling, Recognition and acceptance of vocational education qualifications: A search for existing and perceived problems in the Dutch-German border region, 2019. Accessed via: https://www.euregio.eu/wp-content/uploads/2020/09/Erkenning-en-acceptatie-van-diplomas-in-het-beroepsonderwijs-Lambert-Teerling_0.pdf

Lack of clear information and complex procedures

With regard to the availability of information and the complexity of recognition procedures, the ITEM report of 2016 highlighted persistent uncertainty about identifying the competent authority to which recognition applications should be submitted. Competent authorities vary across countries depending on their governance structure, for instance, between regions in Belgium or between States in Germany, as well as by profession, where different sectors are often responsibility of different ministries. Although a large amount of information is available, it is not always kept up to date, tailored to the applicant's specific situation, or available in multiple languages.[35] This issue was also addressed in a b-Solutions project for the Province of Limburg, where ITEM developed roadmaps and factsheets for professions such as physiotherapist, secondary school teacher, and nurse in order to improve the provision of information.[36] Also studies on the EU level[37], and the Greater Region refer to this obstacle.[38] Clear and accessible information is crucial to ensure that procedures are carried out quickly and effectively. A 2018 study by Task Force Frontaliers found that recognition procedures are often delayed due to incomplete applications and missing documents. Applicants frequently struggle to identify precisely which documents are required.[39] Therefore, the lack of clear information can also lead to delays in the recognition procedure. The incompleteness, incorrectness and illegibility of documents submitted by applicants pose also challenges for the authorities dealing with the applications.[40]

Other obstacles arise from the (legal) complexities of the recognition procedure. Applicants are not always certain which procedure applies to them, whether their profession is regulated in the home and/or host country and thus requires *professional* recognition, or whether they must (additionally or instead) undergo *academic* recognition. Further difficulties arise from differences between countries in determining which professions and specialisations are regulated, particularly for workers seeking to practise a profession that is *unregulated* in their home country but *regulated* in the host country.[41]

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[35] ITEM Cross-border Impact Assessment 2016, Dossier 2: Recognition of Professional Qualifications, accessed via: https://crossborderitem.eu/publicaties/grenseffectenrapportage-2016-dossier-2-erkenning-van-beroepskwalificaties/.

[36] B-Solutions project, 'Roadmap and Factsheet for the Recognition of Qualifications for Highly Demanded Professions', October 2019, https://crossborderitem.eu/en/publications/roadmaps-factsheets-on-recognition-of-qualifications/

[37] European Commission: Directorate-General for Employment, Social Affairs and Inclusion, ECORYS, Curtarelli, M., Donlevy, V., McCoshan, A. et al., Study on obstacles to recognition of skills and qualifications – Final report, Publications Office, 2017. Accessed via: https://op.europa.eu/en/publication-detail/-/publication/156689fd-e922-11e6-ad7c-01aa75ed71a1/language-en

[38] J. Snijders, L. de Haan, Easing legal and administrative obstacles in EU border regions, 'Case Study No. 9 Labour mobility Obstacles in the recognition of professional qualifications (Germany – Luxembourg – France – Belgium)', February 2017, accessed via: https://ec.europa.eu/regional_policy/en/information/publications/studies/2017/easing-legal-and-administrative-obstacles-in-eu-border-regions

[39] Task Force Frontaliers of the Greater Region 2.0, 'Transposition to the Greater Region Directive (EC) on the recognition of professional qualifications – Inventory', 2018, accessed via: https://www.granderegion.net/fr/ia_publication/transposition-dans-la-grande-region-de-la-directive-ce-relative-a-la-reconnaissance-des-qualifications-professionnelles/

[40] B-Solutions project, 'Roadmap and Factsheet for the Recognition of Qualifications for Highly Demanded Professions', October 2019, https://crossborderitem.eu/en/publications/roadmaps-factsheets-on-recognition-of-qualifications/

[41] J. Snijders, L. de Haan, Easing legal and administrative obstacles in EU border regions, 'Case Study No. 9 Labour mobility Obstacles in the recognition of professional qualifications (Germany – Luxembourg – France – Belgium)', February 2017, accessed via: https://ec.europa.eu/regional_policy/en/information/publications/studies/2017/easing-legal-and-administrative-obstacles-in-eu-border-regions

Challenges related to language requirements and costs

While costs of procedures have not been identified as major obstacle in the previous research of ITEM focusing on the Euregio Meuse-Rhine,[42] The Task Force Frontaliers has noted that in the Greater Region, costs vary widely and can pose an obstacle for applicants, particularly when they are very high or not communicated transparently.[43] Here too, it is important to provide clear information on the costs of recognition procedures, as unawareness or excessively high fees can discourage cross-border mobility.[44] Similar findings have been made on the EU level.[45] Regarding the recognition process, other challenges identified relate to language in which documents can be submitted. This may delay the recognition process when the applicant has to obtain (certified) translations and pay for possible translation costs. In this respect, it's worthwhile to note that costs do not only arrive from the recognition process itself, but possibly also from costs of obtaining documents, translations, additional training, and cost associated with practise of the profession (for instance, a registration in a professional register). Task Force Frontaliers has noted, with regard to compensation measures (adaptation periods), that some applicants are required to pay considerable sums, while in other cases they are paid to participate. Overall, they observed that the more applicants have to finance a significant part of the course themselves, the more likely they are to drop out of the adaptation course and abandon their application for recognition. Language requirements can also pose a challenge in order to access a profession, especially if authorities only approve a certain type of exam.[46] This can pose an obstacle for citizens who have for instance learned the language in a family context or have grown up in multilingual environment, especially those in border regions, and do not necessarily possess the required certifications to prove their language proficiency.[47]

Shortcomings in the implementation and compliance with the EU Directive

The European Commission evaluated the Directive in 2011, concluding that while the general system provides an effective solution, the case-by-case approach remains a burdensome exercise for both authorities and professionals. Regarding the system of temporary mobility, it was used only to a limited extent, with some professionals noting that the administrative requirements could be further simplified. Another issue identified was that authorities' decisions on compensation measures are not always transparent or sufficiently justified in terms of substantial differences between qualifications. Professionals also continue to face major difficulties in finding information on how to obtain recognition – the European Commission noted that the objective of establishing transparent, uniform,

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[42] B-Solutions project, 'Roadmap and Factsheet for the Recognition of Qualifications for Highly Demanded Professions', October 2019, https://crossborderitem.eu/en/publications/roadmaps-factsheets-on-recognition-of-qualifications/

[43] Task Force Frontaliers of the Greater Region 2.0, 'Transposition to the Greater Region Directive (EC) on the recognition of professional qualifications – Inventory', 2018, accessed via: https://www.granderegion.net/fr/ia_publication/transposition-dans-la-grande-region-de-la-directive-ce-relative-a-la-reconnaissance-des-qualifications-professionnelles/

[44] ITEM Cross-border Impact Assessment 2016, Dossier 2: Recognition of Professional Qualifications, accessed via: https://crossborderitem.eu/publicaties/grenseffectenrapportage-2016-dossier-2-erkenning-van-beroepskwalificaties/.

[45] European Commission: Directorate-General for Employment, Social Affairs and Inclusion, ECORYS, Curtarelli, M., Donlevy, V., McCoshan, A. et al., Study on obstacles to recognition of skills and qualifications – Final report, Publications Office, 2017. Accessed via: https://op.europa.eu/en/publication-detail/-/publication/156689fd-e922-11e6-ad7c-01aa75ed71a1/language-en

[46] Task Force Frontaliers of the Greater Region 2.0, 'Transposition to the Greater Region Directive (EC) on the recognition of professional qualifications – Inventory', 2018, accessed via: https://www.granderegion.net/fr/ia_publication/transposition-dans-la-grande-region-de-la-directive-ce-relative-a-la-reconnaissance-des-qualifications-professionnelles/

[47] *Ibid*, pp. 23, 38.

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and quick recognition procedures has not been achieved. The evaluation report found persistent concerns about access to information, as well as the complexity and length of procedures, particularly under the general system.[48] The European Commission currently carrying out an updated review of the Directive, with results expected at the end of 2025.

In October 2024, the European Court of Auditors (ECA) carried out a review of the implementation of the Directive. They concluded that *"[…] the recognition of professional qualifications in the EU is an essential mechanism but used sparsely and inconsistently for exercising the right to pursue a profession in another member state. The application of the directive still has shortcomings and the information provided to citizens is not always reliable."*[49]

One major shortcoming identified by ECA is the limited use of electronic procedures. As outlined in Chapter 2, the 2013 revision of the Directive introduced the European Professional Card (EPC) and the mandatory use of the Internal Market Information (IMI) system. However, the IMI system has been criticised for not being user-friendly, for providing outdated information (such as incomplete lists of competent authorities), and for delays in responses between Member States. At present, the EPC is available for only five professions, but according to the European Court of Auditors it is scarcely used, with the exception of mountain guides and real estate agents. Another drawback is the cost: while the Directive entitles both the home and host Member States to charge fees for issuing an EPC, these costs can constitute an additional obstacle to labour mobility. Indeed, the fees vary significantly, ranging from no cost in the Netherlands, Belgium, and France, to €75 in Luxembourg and up to €400 in Germany.[50]

Other new mechanisms, such as the common training principles to foster automatic recognition, have also remained unused. ECA notes that common training frameworks have not yet been implemented, partly because the required quota of one-third of Member States (nine) has not been reached, and partly because it is difficult to identify sufficient commonalities in training programmes and regulatory frameworks across such a large number of Member States.[51] This is a particularly notable finding for border regions, which may wish to collaborate, for instance within the Benelux Union, but the required quota makes the mechanism ineffective for cross-border regional cooperation.

The ECA also identified cases of non-compliance with the Directive. Some authorities require more documents and perform more checks than the Directive allows, which results in longer decision times than the maximum period laid down in the Directive. An example was given regarding Belgium, where nurses are asked to provide motivation letters, even though the Directive does not list motivation letters among the documents that competent authorities may require. In Luxembourg, sworn

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[48] European Commission: Evaluation Of The Professional Qualifications Directive (Directive 2005/36/EC), 5 July 2011, accessed via: https://single-market-economy.ec.europa.eu/single-market/services/free-movement-professionals/policy-developments/legislation-professional-qualifications_en.

[49] European Court of Auditors Special report 10/2024: The recognition of professional qualifications in the EU – An essential mechanism, but used sparsely and inconsistently, accessed via: https://www.eca.europa.eu/en/publications/SR-2024-10&od=1

[50] Based on information provided at: https://europa.eu/youreurope/citizens/work/professional-qualifications/european-professional-card/index_en.htm#obtain-EU-1

[51] European Court of Auditors Special report 10/2024: The recognition of professional qualifications in the EU – An essential mechanism, but used sparsely and inconsistently, accessed via: https://www.eca.europa.eu/en/publications/SR-2024-10&od=1

translations by translators registered in Luxembourg are required for all professions.[52] Regarding cases of incompliance, it is also noteworthy that in December 2024, the European Commission initiated infringement proceedings against several EU Member States, including Belgium, Germany, France, Luxembourg, and the Netherlands. In particular, these cases concern citizens applying for recognition under temporary service provision, where prior checks were required in an unjustified manner for several professions that do not meet the conditions under which such checks are permitted.[53]

Obstacles for third-country nationals

In November 2023, the European Commission adopted a Recommendation on the recognition of qualifications of third-country nationals[54]. Third-country nationals (TCNs) generally fall outside the scope of the Directive. However, some citizens – such as long-term residents, family members of EU citizens, beneficiaries of refugee or subsidiary protection, researchers, EU Blue Card holders, and seasonal workers, benefit from equal treatment under certain EU labour migration Directives. The system for recognising the professional qualifications of third-country nationals in the EU is therefore highly fragmented and lacks uniformity. The Directive itself does not prevent Member States from recognising qualifications obtained outside the EU, provided minimum training requirements are respected. Nevertheless, it differs between Member States whether they apply the rules of the Directive to TCNs or establish other regulations. For these reasons, the European Commission calls on Member States to simplify and accelerate their procedures for recognising qualifications of TCNs, bringing practices closer to those established under the EU Directive.

In their Recommendation, the European Commission identifies several obstacles for TCNs and employers regarding recognition of professional qualifications. These include limited availability of information and support, linguistic barriers, lengthy and costly procedures without the procedural safeguards (such as deadlines) provided under the Directive, and difficulties in supplying certified and translated documents, especially when such documents are not typically issued in their home countries or cannot be obtained due to emergency circumstances (e.g. fleeing conflict). When linked to residence or work permits, recognition procedures are further complicated by high refusal rates and long processing times, while assessments often fail to reflect applicants' full skill sets beyond formal qualifications. These challenges extend beyond regulated professions, affecting non-regulated sectors where comparability statements or proof of authenticity are needed to demonstrate the value of skills to employers. Employers themselves face burdens related to administrative complexity, verification of authenticity, translation requirements, and long processing times, making it harder to attract TCNs in competitive labour markets. In some Member States, TCNs require a work or residence permit, which is subject to labour market tests. These tests further add to existing barriers, as they give priority to EU citizens. Only if no EU citizen is available for the position can a TCN be hired.[55] Member States also

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[52] *Ibid.*

[53] European Commission December 2024 infringements package: key decisions, available via https://ec.europa.eu/commission/presscorner/detail/en/inf_24_6006

[54] Commission Recommendation on the recognition of qualifications of third-country nationals (TCNs) 15 Novemeber 2023, (C(2023) 7700 final), accessed via: https://single-market-economy.ec.europa.eu/publications/commission-recommendation-recognition-qualifications-third-country-nationals_en

[55] See also: Sivonen, S., Mertens, P., Kramer, S., Didden, B., Melin, P., & Cörvers, F., 'Mobility and Integrated Labour Markets for Third-country Nationals in Greater Copenhagen: Barriers to cross-border labour mobility for TCNs – learning from other EU cross-border regions' 2025. OECD Publishing. https://doi.org/10.1787/ba2a4777-en

face structural challenges in recognising TCN qualifications. These include difficulties in verifying the authenticity of documents and the absence of equivalence systems to assess foreign education and training. Limited knowledge of third-country education systems and regulatory frameworks hampers effective and timely decision-making. As a result, both TCNs and employers are confronted with uncertainty, costs, and delays, which undermine the EU's broader objective of addressing labour shortages through the effective recognition and use of skills and qualifications from outside the Union.[56]

Other obstacles linked with the recognition of professional qualifications

As recognition of qualifications is linked with cross-border work across the border, obstacles have also been reported with respect to social security and taxation.[57] Task Force Frontaliers has identified another obstacle in the exercise of a profession regarding professional liability insurance. German midwives wishing to (temporarily) exercise their activity in France within the framework of their freedom to provide services, have to obtain a professional liability insurance to cover their activities abroad. German insurers offering professional liability insurance – which are already very expensive – refuse to cover this cross-border activity. As a result, midwives end up having to take out additional insurance in France, which is uneconomical, and they end up abandoning their plans for a cross-border activity.[58]

3.2 Obstacles for service providers in cross-border regions

Smooth recognition of professional qualifications is crucial for employers and service providers in cross-border regions, as it allows them to hire workers from neighbouring areas and tap into a larger pool of workers and talent. This contributes to strengthening regional economies and promoting sustainable socio-economic development by creating more employment opportunities in border areas. The possibility to easily hire workers neighbouring regions is also crucial for service providers aiming to collaborate and establish joint services across borders. Indeed, slow or complex recognition procedures have been reported to hinder cross-border economic activity, reduce competition, and limit professional opportunities for people living in border regions.[59] In this section, examples from the education and healthcare sectors will be used to illustrate the challenges employers and service providers face when recruiting workers from across the border.

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[56] Commission Recommendation on the recognition of qualifications of third-country nationals (TCNs) 15 Novemeber 2023, (C(2023) 7700 final), accessed via: https://single-market-economy.ec.europa.eu/publications/commission-recommendation-recognition-qualifications-third-country-nationals_en

[57] Sivonen, S., & Coppens, D, 'EMRLingua: Legal and administrative obstacles in the mobility of secondary school teachers in the Euregio Meuse-Rhine (EMR). 2023. https://crossborderitem.eu/en/projects/emrlingua/

[58] Task Force Frontaliers of the Greater Region 2.0, 'Transposition to the Greater Region Directive (EC) on the recognition of professional qualifications – Inventory', 2018, accessed via: https://www.granderegion.net/fr/ia_publication/transposition-dans-la-grande-region-de-la-directive-ce-relative-a-la-reconnaissance-des-qualifications-professionnelles/, p. 38.

[59] J. Snijders, L. de Haan, Easing legal and administrative obstacles in EU border regions, 'Case Study No. 9 Labour mobility Obstacles in the recognition of professional qualifications (Germany – Luxembourg – France – Belgium)', February 2017, accessed via: https://ec.europa.eu/regional_policy/en/information/publications/studies/2017/easing-legal-and-administrative-obstacles-in-eu-border-regions, p. 19.

Examples from the education sector

Following various Interreg-projects developed over time to promote language learning and cross-border exchanges, the Interreg-project EMRLingua had as its primary objective to promote the education of neighbouring languages (Dutch, French, German) in the Euregio Meuse-Rhine and exchange of teaching staff in the Euregion, for instance for the purpose of language teaching and/or to facilitate bilingual education practices such as Content and Language Integrated Learning (CLIL) and Language Immersion. One prominent reason for such initiatives is that knowing the official language of a neighbouring country or region makes it less of an obstacle to live, study, work there.[60] Schools in the Euregio Meuse-Rhine that engage in cross-border exchanges and integrate knowledge and language programs can be awarded the distinction of 'Euregioprofielschool' (Euregio Profile School).[61] However, the shortage of (language) teachers has become a prominent issue on all sides of the border in the EMR. Language teachers are often hard to find, as well as teachers who can teach different subjects in another language, for example as part of a bilingual education programme. In cross-border regions such as the EMR, one potential way to deal with such shortages is to employ (language) teachers from the neighbouring regions. Yet, given the still limited cross-border mobility of teachers in the EMR and the uneven mobility flows within the region, this potential appears to remain largely untapped. Research conducted within the framework of the project confirmed that cross-border mobility of secondary school teachers is still limited due numerous obstacles restricting such mobility and hampering the development of binational education programmes and exchanges that would benefit the cross-border region. One of the most significant obstacles identified was the recognition of professional qualifications.[62]

It was found that the underlying reason for these obstacles on recognition of professional qualifications was due to the lengthy procedure, lack of information provision, differences in teacher education between the countries/regions, and by the fact that teachers were frequently required to complete additional training before recognition was granted. Interestingly, these obstacles did not only arise between the three examined countries, but also between the language/community regions in Belgium. Also, language skills and namely the way of proving them was an obstacle. One teacher indicated to experience that in Belgium, the authorities are stricter on the examination of language skills than the professional qualifications and prior training. He gave an example of a colleague who despite his long-standing residence in a German-speaking region, as well as a university degree in the German language, was also required to do a German language test before he could start teaching in the same school.[63]

Finally, the report observed that obstacles related to the recognition of qualifications are closely linked with other challenges typical of cross-border employment. For example, the lack of recognition of a teacher's qualifications often leads to less favourable employment conditions, such as lower salaries, the loss of (or inability to obtain) a permanent contract, or exclusion from civil servant status. The absence of civil servant status, in turn, can affect the Member State in which the teacher is liable for

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[60] Sivonen, S., & Coppens, D, 'EMRLingua: Legal and administrative obstacles in the mobility of secondary school teachers in the Euregio Meuse-Rhine (EMR). 2023. https://crossborderitem.eu/en/projects/emrlingua/

[61] More information at: https://euregio-mr.info/nl/themen/unterricht-und-bildung/euregioprofilschulen.php

[62] Sivonen, S., & Coppens, D, 'EMRLingua: Legal and administrative obstacles in the mobility of secondary school teachers in the Euregio Meuse-Rhine (EMR). 2023. https://crossborderitem.eu/en/projects/emrlingua/

[63] *Ibid.*

social security contributions and taxation. Taken together, these factors can either discourage or, in some cases, incentivise (when, for instance, salaries are higher in the neighbouring country) cross-border mobility of secondary school teachers.[64]

Similar challenges regarding the recognition of qualifications have also arisen in the development of bilingual or binational childcare services. A recent b-solutions case in the Dutch-German border area of the Euregio Meuse-Rhine, involving cooperation between Kerkrade (NL) and Herzogenrath (DE) under the Eurode framework, highlighted local councils' interest in creating a joint childcare centre. Such a facility could improve accessibility for families in the border region, while research shows that bilingual childcare fosters language development and overall well-being. In addition, a binational centre could lay the groundwork for broader cross-border cooperation in education, including a continuous pathway towards bilingual primary education and greater incentives for schools to offer neighbouring language education. However, several obstacles, including the recognition of professional qualifications, hinder the establishment of a binational daycare. Recruiting qualified staff from both sides of the border is difficult, as the region already faces shortages and the recognition of German and Dutch childcare diplomas can take months, making short-term exchanges unfeasible. Differences in training requirements further complicate recognition by the lack of mutual recognition between Germany and the Netherlands. Finally, language proficiency requirements for staff present an additional barrier to cross-border employment. These obstacles are also experienced in other cross-border regions where similar joint childcare services were developed. For example, in the Franco-German Eurodistrict SaarMoselle, German authorities did not recognise the diplomas of French childcare staff due to differences in required competences. As a result, French professionals had to undergo additional training before their qualifications were recognised and before they could work in the childcare centre on the German side.[65]

The lack of recognition and harmonisation also creates obstacles for cross-border apprenticeships. In the Eurometropolis Lille–Kortrijk–Tournai, it is reported that this issue affects cooperation between the French partner (Hauts-de-France Region) and the Belgian partners (the Flemish Region and Community, the Walloon Region, and the Wallonia-Brussels Federation). Many obstacles found in terms of cross-border mobility of French and Belgian apprentices, including linguistic barriers and variations in age limits, different financial arrangements and a weak mobilisation of stakeholders due to a lack of information.[66] In the same region, efforts were made to promote joint degree programmes, which can enrich academic diversity by combining perspectives and skills from multiple countries. Yet, these initiatives face legal and administrative hurdles that call for greater simplification and harmonisation. Key obstacles arise from differences between national higher education systems, such as those of Belgium and France. Although the Bologna process aims to harmonise standards, varying

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[64] *Ibid.*

[65] https://ec.europa.eu/futurium/en/pilot-projects/shared-cross-border-public-services-french-german-creches.html

[66] https://ec.europa.eu/futurium/en/pilot-projects/facilitating-cross-border-mobility-within-scope-dual-education-eurometropolis-lille.html

national interpretations still create discrepancies in credit recognition, complicating the mutual recognition of diplomas.[67]

Examples from the healthcare sector

Demographic shifts such as an aging population and labour shortages in healthcare are driving many countries, including the Netherlands and Germany, toward the centralisation of healthcare services.[68] While this may increase efficiency at the national level, it also raises concerns about the accessibility of healthcare in border regions, which are often peripheral and more vulnerable to service gaps. For this reason, healthcare providers in these areas increasingly seek cross-border cooperation to ensure service availability and to pool resources, knowledge, and specialist expertise. Belgium, the Netherlands, and Germany have already launched several such initiatives to maintain high-quality care in their shared cross-border regions.

One example is paediatric surgery, a highly specialised field requiring lengthy training and limited in its geographical spread. European research shows that the Netherlands and Belgium host relatively few paediatric surgery centres compared to Germany. In particular, the southern Netherlands lacks adequate coverage, meaning that children in the Euregio Meuse-Rhine often travel far from home to undergo surgery. To address this, partner hospitals in the Euregio Meuse-Rhine are working to establish a Euroregional paediatric surgery centre. Yet the initiative faces major obstacles, particularly around recognition of professional qualifications. Paediatric surgery training differs significantly between Belgium, the Netherlands, and Germany, which prevents automatic recognition of qualifications. Surgeons may be required to undertake additional training before being authorised to work across the border. This not only hampers swift recognition of specialists but also complicates efforts to create cross-border training pathways for future paediatric surgeons.[69]

Similar obstacles are faced by ZorgSaam hospital in Terneuzen, the Netherlands, near the Belgian border, which collaborates with Ghent University Hospital, regularly exchanging staff. However, they recently reported an obstacle to the Schakelpunt (a coordination point for resolving border barriers between Flanders-Netherlands) concerning the recognition and registration of doctors. Dutch law requires registration in a BIG-register before doctors can practice, a process that is reported both time-consuming and administratively heavy. This creates significant delays in filling urgent vacancies. For example, a neurologist from Ghent was available to help at short notice, but registration delays prevented immediate deployment without supervision.[70] Similar barriers are reported along the Dutch-German border in Twente-Münster, where hospitals want to exchange personnel and pool medical resources such as intensive care beds and radiological equipment. Such cooperation could

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[67] Michael Frey, B-solutions report: Joint degrees: Reinforced cross-border student mobility, European Grouping of Territorial Cooperation Eurometropolis Lille–Kortrijk–Tournai – Belgium–France, accessed via: https://www.b-solutionsproject.com/_files/ugd/8f68c1_1c1d85fd72854d228ac5f843261336a9.pdf

[68] See also ITEM Cross-Border Impact Assessment 2023, 'Future-proof organisation of acute care in the Netherlands – 360° cross-border perspectives', available via: https://crossborderitem.eu/en/cross-border-assessment-2023-dossier-4-future-proof-acute-care-in-the-netherlands-360-cross-border-perspectives/

[69] More information available at: https://crossborderitem.eu/en/projects/euroregional-center-for-pediatric-surgery/

[70] More information available at: https://www.schakelpunt.eu/grensbelemmeringen/registratie-van-bevoegde-arts-uit-buurland/

help mitigate shortages, improve efficiency by reducing resource hoarding, and ultimately provide patients with faster access to specialised care.[71]

Next to planned healthcare services, recognition of qualifications also poses challenges in the framework of emergency services. Legal agreements concluded in the Benelux Union allows ambulances to cross borders between the Netherlands, Belgium, and Luxembourg. However, even where cross-border movement is legally possible, differences in the competences and training of ambulance personnel create practical challenges. Variations in what paramedics are authorised to do in each country complicate seamless cross-border deployment.[72]

Similarly, obstacles have been reported between the Franco-Belgian border, where cooperation in field of healthcare is increasing. The main obstacle arises from the cumbersome administrative procedures for recognising healthcare professionals' diplomas, which are both complex and time-consuming. Since national regulations continue to apply on both sides, professionals must undergo two separate registration processes to practice medicine across borders.[73]

3.3 Results of the ITEM Survey 2025 on obstacles and best practises of recognition of professional qualifications in cross-border regions

To gain updated insights into the recognition of professional qualifications, ITEM conducted a survey[74] in March 2025 to collect information on where citizens, institutions, and businesses in cross-border regions face difficulties with cross-border mobility and recognition of qualifications, as well as to gather best practices and recommendations for addressing these challenges.

The survey was distributed with ITEM stakeholders and contacts between Belgium, Netherlands, Luxembourg, Germany and France, via the ITEM newsletter, social media channels and contacts. Two different surveys were created, one for institutions and another for citizens. The survey for institutions targeted organisations and businesses that have experiences hiring professionals across borders or advising on cross-border work and recognition of professional qualifications. Next to that, the survey targeted citizens who are working or planning to work across the border and have experience of the procedure of obtaining recognition of their qualifications in another country. The survey first addressed obstacles, asking whether those previously identified by ITEM (as discussed earlier in this chapter) were still being experienced. Respondents were also asked to rank which obstacle they encountered most frequently, which they considered the most severe, and which they believed should be prioritised for resolution. Next to that, institutions were asked about professions that are mobile

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[71] More information available at: https://www.bridgeresourcepooling.eu/

[72] See also: Sivonen, S., & Kortese, L, 'Cross-border Cooperation on Ambulance and Intensive Care Transport: Examining Opportunities to Strengthen Cooperation' 2021, available via: https://crossborderitem.eu/en/publications/cross-border-cooperation-on-ambulance-and-intensive-care-transport-pandemric/

[73] Pauline Pupier, B-solutions report: 'Towards simplified procedures for cross-border health professionals' accessed via: https://www.b-solutionsproject.com/_files/ugd/8f68c1_d4b7ca6eb8c4448598e62e0b66f8c08e.pdf

[74] The survey was conducted in collaboration with students as part of a student project within the 'European Studies' programme at Maastricht University. We would like to give a special thanks to the course coordinator Soetkin Verhaegen and involved students Myrthe Dijkstra, Ida Chanut and Pit Doijen.

across countries, professions that employers are interested in hiring across borders (including joint services developed at border areas), and professions/sectors that face challenges in the recognition of qualifications, and any best practises they had identified that can facilitate the recognition process (See Annex I for full list of questions).

Graph 1: Countries involved among respondents[75]
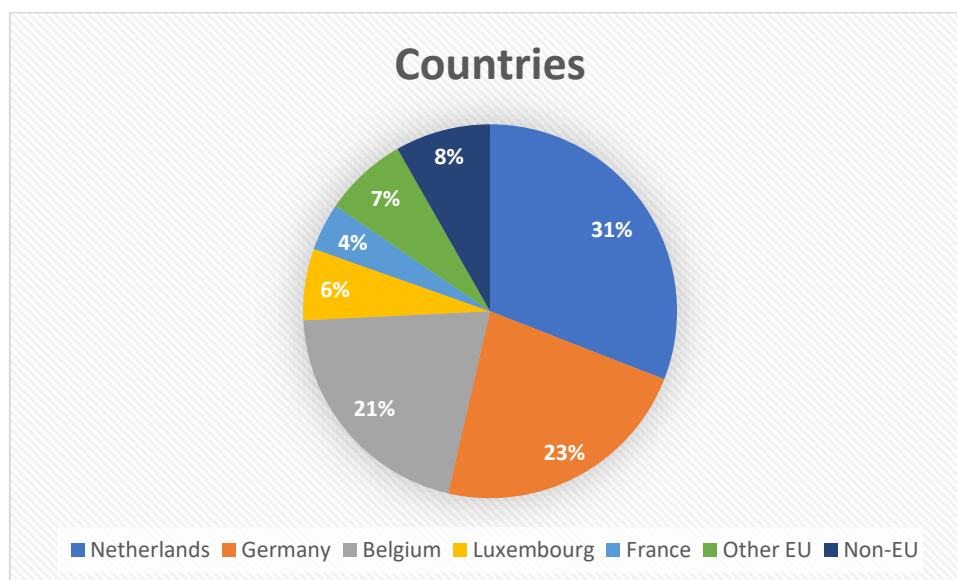
The survey was made available in five languages (English, Dutch, German, French, and Luxembourgish) and received 109 responses in total. Of these, 44 responses from institutions and 9 from citizens were deemed analysable, having provided a sufficient number of answers. It must be noted that the sample size of the survey responses, especially among citizens, was very small, and results should be interpreted carefully and treated more as case studies. Therefore, the analysis of the results will focus mainly on the responses of the institutions. Responses were received from institutions such as Euregions, Cross-Border Information Points, employment agencies, municipalities, ministries of economy and employment, Interreg-projects and partnerships, trade unions, education institutions (both secondary and higher education), and other service providers. As seen in Graph 1, responseswere obtained from the Netherlands, Germany, Belgium, Luxembourg and France, and other EU[76] and non-EU countries[77]. Most answers regarded citizens mobile between Germany, the Netherlands and Belgium, with less responses obtained from Luxembourg or France.

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[75] Based on which country the institution is based (country of establishment), and with which countries they deal with/have experience on recognition of professional qualifications (country of destination).

[76] Slovakia, Poland, Hungary were specifically named.

[77] Switzerland, UK, Turkey, Vietnam and Mexico were specifically named.

Obstacles reported by institutions

Graph 2: Obstacles reported by institutions
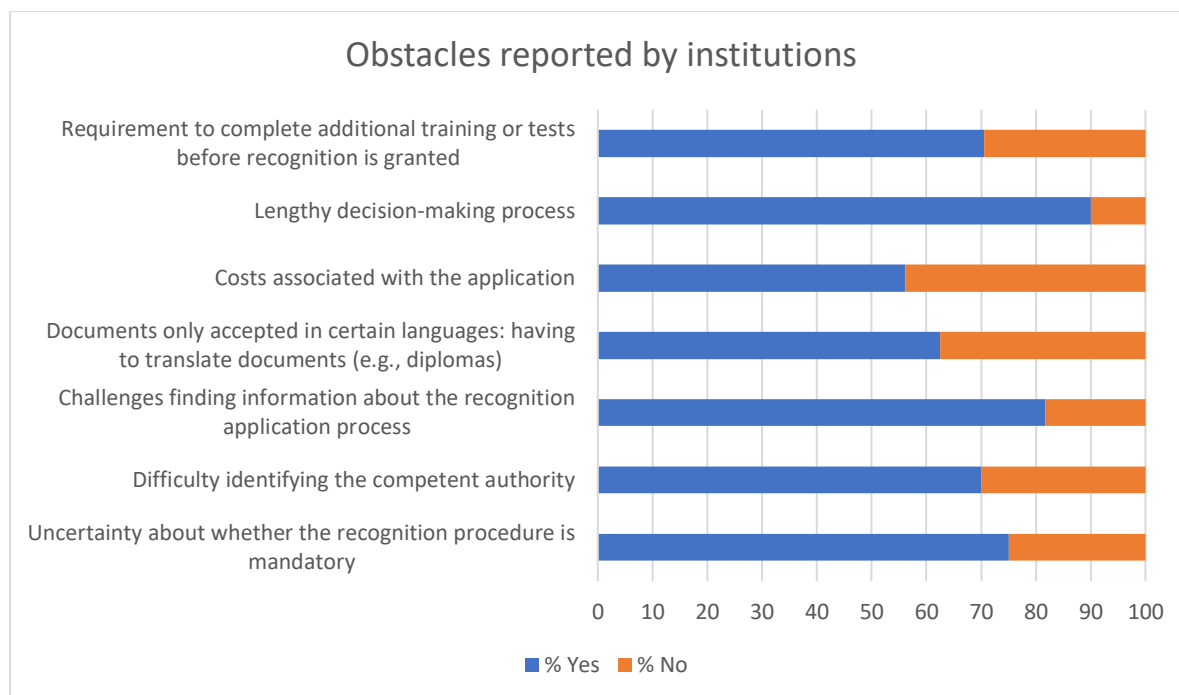
The survey findings suggest that the most prevalent obstacles among the respondents, named by both institutions and citizens, related to 'the lengthy decision-making process' (how long it did take to obtain recognition). Among the citizens who reported these obstacles, the recognition procedure took more than four months. Another obstacle that was most prevalently reported and often linked with that of 'lengthy process' regarded the 'requirement to complete additional training or tests before recognition is granted', which, according to the respondents, should have top priority when aiming to improve the process. Citizens who encountered additional requirements as an obstacle were obliged to complete extra training periods and demonstrate their language proficiency.

Illustration 1: Quotes regarding (the lack of) harmonisation
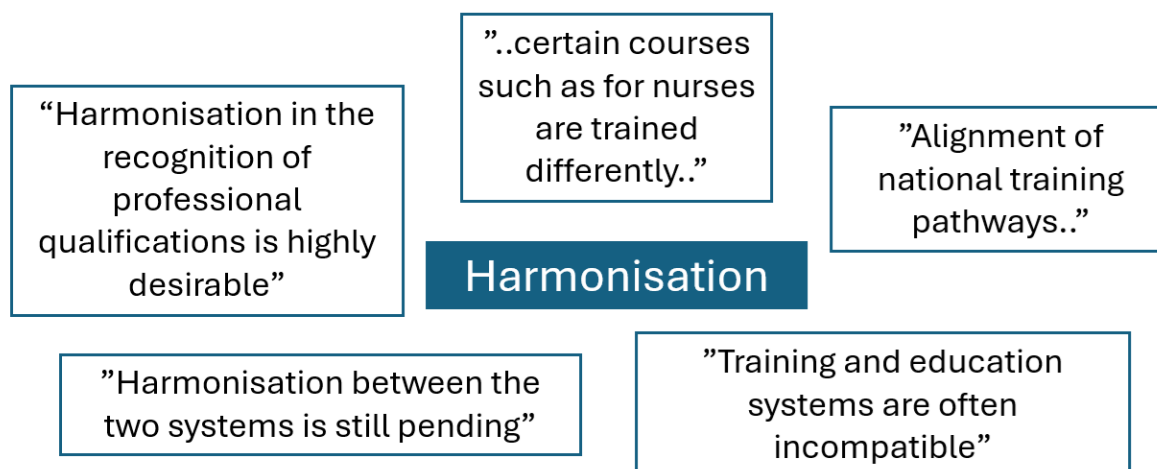
The obstacles related to lengthy procedures and additional training were often linked by institutions to the 'lack of harmonisation' between EU countries (see Illustration 1), referring to differences in education, training, and professional requirements. Several respondents noted that these discrepancies hinder cross-border work, constrain the cross-border labour market, and delay recognition procedures. Healthcare was frequently cited as an example, with significant differences between countries in how professionals are trained and the scope of medical tasks they are authorised to perform. Respondents also associated harmonisation with the principle of free movement in Europe (see Illustration 2), stressing that the freedom of movement of workers and the functioning of the EU internal market remain challenged by recognition requirements.

Illustration 2: Quotes regarding free movement in Europe

"In a Europe where free movement of capital, labour and goods has been agreed upon, these barriers should be removed as much as possible."

" This should not be an obstacle within the EU!"

"Is being made far too difficult."

"there is virtually no "freedom of work" as desired by the EU"

Free movement in Europe

" We send our students to all countries within Europe with Erasmus Plus to gain practical experience, but if they then consider a career in one of these countries, it becomes very difficult in certain professions."

Another major obstacle highlighted by respondents was the difficulty in finding clear information on recognition procedures, including identifying the correct authority to which an application should be submitted and whether recognition was mandatory (see Illustration 3). The lack of accessible information was the most frequently mentioned obstacle, both among institutions and citizens with experience of the procedure. It also emerged repeatedly in the open-ended responses, where issues such as 'uncertainty about the necessity of the procedure,' 'struggles in identifying the right authorities,' and concerns over 'information accessibility, clarity, transparency, and support' were raised. Many respondents stressed that the lack of clarity around which authority is responsible, particularly as each sector often has its own recognition procedure, creates confusion. Citizens are often unsure whether they require professional or academic recognition, and whether their profession is regulated or not. In federal countries, it can be further complicated by uncertainty over which district government is competent. Respondents also pointed to limited capacity at competent authorities, resulting in slow responses to queries, while unclear requirements regarding necessary documents were seen as contributing to longer processing times.

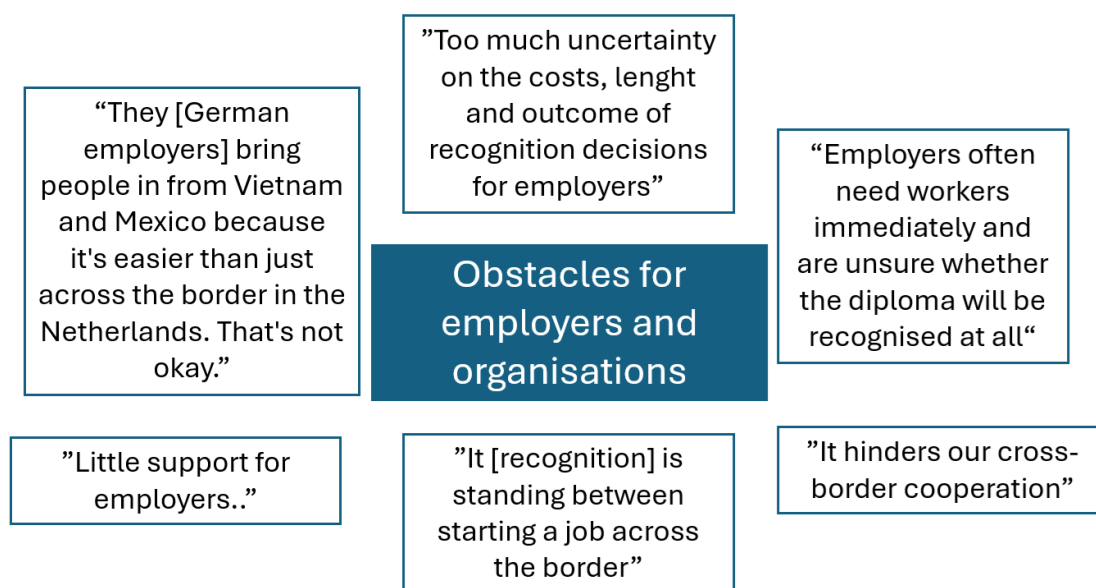Illustration 3: Quotes regarding information clarity and accessibility
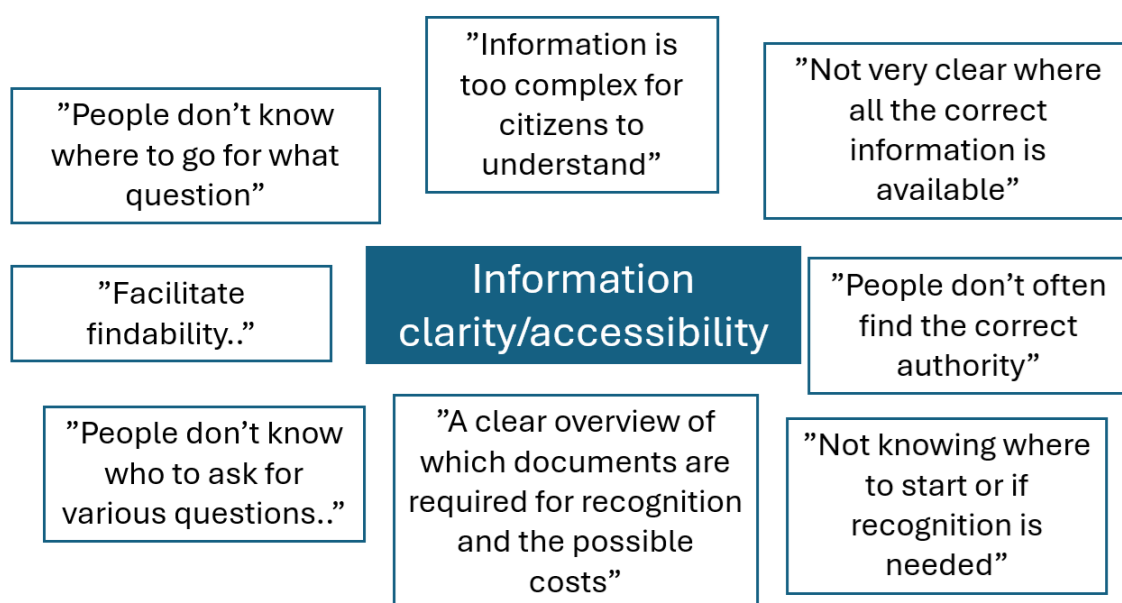
The least frequently reported obstacle, though still noted by respondents, concerned the costs of the procedure. Similar to the lack of clarity around required documents, respondents highlighted uncertainties about what costs would be incurred and who was responsible for covering them. Costs often fall on the applicant, who must not only pay application fees but also cover translation expenses. The need to translate documents was itself mentioned as an obstacle. Among citizen respondents, one noted that in addition to application fees, they also had to pay for language courses and certification to prove language proficiency.

Obstacles for employers and service providers in cross-border regions
When asked whether the respondents were aware of any institutions or employers that face difficulties in recruiting employees across borders or in developing (cross-border) services due to challenges related to the recognition of professional qualifications, most answered in affirmative (see Illustration 4).[78] The findings indicate that the healthcare, education, childcare, and industrial sectors are particularly relevant, as these were the most frequently mentioned. Within healthcare, this includes nurses, such as nurse assistants and specialised nurses, as well as other professions like doctors, specialised doctors, social workers, and pharmacists. In education, respondents referred to school teachers, including secondary school teachers, language teachers, pedagogical workers, and school assistants. Childcare workers, particularly those in kindergartens, were also highlighted. Finally, in the industry and technical sector, the references ranged from manual and production work to engineers and other technical professions.

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[78] (Yes 59.4%, No 21.9%, no response 18.7%).

Illustration 4: Quotes regarding obstacles for employers and organisations

"They [German employers] bring people in from Vietnam and Mexico because it's easier than just across the border in the Netherlands. That's not okay."

"Too much uncertainty on the costs, lenght and outcome of recognition decisions for employers"

Obstacles for employers and organisations

"Employers often need workers immediately and are unsure whether the diploma will be recognised at all"

"Little support for employers.."

"It [recognition] is standing between starting a job across the border"

"It hinders our cross-border cooperation"

Many respondents highlighted that employers often require workers immediately but face uncertainty over whether diplomas will be recognised at all. This creates obstacles both for employees and employers, delaying or even preventing the start of cross-border employment. The procedures are also costly and lengthy, increasing the risk that applicants are not hired due to the uncertainty involved. Education institutions reported similar concerns, particularly for students in border regions. For example, Dutch students studying near the German border, or German students returning home after completing studies in the Netherlands, often face recognition issues. Institutions such as Euregio schools and intercultural study programmes, which aim to promote a 360° cross-border labour market, also noted that students encounter difficulties when arranging internships that require recognition of qualifications. Hospitals likewise emphasised that recognition requirements hinder cross-border cooperation with other healthcare providers across the border, as they prevent the smooth exchange of healthcare staff. Finally, respondents stressed that better information provision is crucial, not only for citizens but also for employers. Employers are often inexperienced with recognition procedures and therefore unable to properly advise new or prospective employees.

Other obstacles

In addition to the predefined list of obstacles, respondents identified several further challenges. These included the certification of documents (such as diplomas, certificates, and translated materials) and the costs and burdens of obtaining translations. Language and cultural barriers were also frequently mentioned. With regard to the recognition procedure itself, one respondent noted that even minor formal deficiencies in applications, for instance, incomplete documentation of training courses, could not be remedied and led to rejection. Other barriers highlighted included data protection rules, which limit the accessibility and transfer of information between systems in different countries, as well as issues related to social security and taxation when working across borders. Some respondents pointed to a general lack of awareness about opportunities to work in neighbouring countries. The recognition of qualifications from non-EU applicants was considered particularly complex, especially for refugees who often struggle to provide the necessary documentation of their prior education or training. Finally, one citizen gave the example of difficulties not only in securing recognition initially, but also in

obtaining re-registration and recognition of life-long learning achievements, such as continuing education, acquired in another Member State.

Recommendations

The survey respondents made a number of recommendations to improve the recognition of professional qualifications across borders. They emphasised the need to facilitate access to clear and easily findable information, including simplified procedures, faster processing times, and better communication throughout the process. A recurring suggestion was to provide a clear and transparent overview on official websites of which documents are required for recognition, along with an indication of the expected costs. Respondents also pointed to the importance of reducing costs where possible and strengthening knowledge exchange between countries regarding education systems and diplomas. Competent authorities should play a more active role in shaping and facilitating recognition procedures, particularly in cross-border regions, while national training programmes should be better coordinated so that completed studies allow individuals to practise their profession in neighbouring countries, with the European Qualifications Framework identified as a useful transparency tool in this regard. Other priorities mentioned include facilitating language learning, improving the equivalence of qualifications, and expanding the scope of automatic recognition of diplomas to also professional qualifications. Several respondents stressed that, especially given current labour shortages, procedures should be made more flexible and efficient. Further proposals included harmonising training programmes, particularly in field of healthcare. One citizen recommended creating an open registry of recognised and non-recognised specialisations and ensuring that information is directed not only at citizens but also at employers to support the integration of new employees. Overall, respondents highlighted that recognition of qualifications should be seen as a priority in promoting cross-border cooperation, with practical measures offering the potential for quick wins if there is sufficient political and institutional will.

3.4 Statistics on mobility and recognition decisions

This section looks at recognition statistics to shed light on cross-border mobility between the Benelux countries, Germany, and France. By comparing the number of applications and the rate of positive recognition decisions, it highlights where recognition procedures run smoothly and where significant challenges remain.

Data from the European Commission's Regulated Professions Database

The data presented is based on the European Commission database on recognition of professional qualifications under the EU Directive 2005/36 for the year 2022, focusing on the statistics of applications between the Benelux countries as well as Germany and France ("Benelux+"). However, the figures must be interpreted with caution, as inconsistencies in the German data suggest that their entries in the database are incomplete. In summary, in 2022, Luxembourg received the highest number of applications, followed by Belgium, while the Netherlands recorded the lowest number among the Benelux countries. Luxembourg also stood out with the highest rate of positive decisions, whereas the Netherlands had the lowest rate of all five countries examined. Notably, mobility between Belgium and the Netherlands in both directions showed low recognition rates, with around 75% of applications resulting in a positive decision.

Looking at mobility patterns, most applications from Belgium were to France, Luxembourg, with the lowest percentage of positive decisions in mobility to the Netherlands. From the Netherlands, most applications were to Belgium. Applications from Luxembourg were relatively few, directed mainly to France and Belgium, with no applications to the Netherlands (or incomplete data). From France, most applications were to Luxembourg and Belgium, with a particularly low positive decision rate for mobility to the Netherlands (48.1%) and relatively low rates for Belgium (66.7%). From Germany, most applications were to Luxembourg, with the lowest positive decision rate again observed in mobility to the Netherlands (61.2%).

In terms of the type of applications, Luxembourg received a relatively high number under the automatic system compared to the general system, whereas the other countries showed a more balanced distribution. With regard to compensation measures, adaptation tests were more commonly used than adaptation periods in Belgium, Luxembourg, and France, while in the Netherlands adaptation periods were used more often than tests (no tests were recorded in Germany).

Table 2: Statistics collected from the European Commission Regulated Professions Database[79]

Country of qualification (home country)	Host country				
	Belgium	Netherlands	Luxembourg	France	Germany
Belgium	n/a	PAE: - PAS: 534 PCP: 25 PCT: 3 PNC: 367 PP: - N: 109 P: 929 Total: 1194 % Positive: 77.8	PAE: 42 PAS: 649 PCP: 20 PCT: 46 PNC: 354 PP: 102 N: 124 P: 1213 Total: 1425 % Positive: 85.1	PAE: 13 PAS: 743 PCP: 30 PCT: 36 PNC: 606 PP: 74 N: 22 P: 1502 Total: 1631 % Positive: 92.1	PAE: - PAS: 48 PCP: 3 PCT: - PNC: 3 PP: 3 N: - P: 57 Total: 57 % Positive: 100
Netherlands	PAE: 5 PAS: 418 PCP: 1 PCT: 14 PNC: 415 PP: 6 N: 126 P: 859 Total: 1150	n/a	PAE: - PAS: 5 PCP: - PCT: - PNC: 1 PP: - N: 1 P: 6 Total: 7	PAE: 1 PAS: 7 PCP: - PCT: 2 PNC: 23 PP: - N: 2 P: 33 Total: 41	PAE: - PAS: 96 PCP: 36 PCT: - PNC: 264 PP: 3 N: - P: 396 Total: 438

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[79] Own calculations based on data obtained from the EC Database: https://ec.europa.eu/growth/tools-databases/regprof/home. PAE = Positive automatically (professional experience i.e. sectors crafts and industry), PAS = Positive automatically (sectoral professions i.e. Annex V), PCP = Positive after compensation (adaptation period), PCT = Positive after compensation (adaptation test), PNC = Positive under general system where no compensation measures imposed, PP = Positive partial access, N = Total negative, P = Total positive, Total = All applications including numbers on on-going applications and applications under appeal not included in the table, % Positive = percentage of positive decisions out of total applications.

	% Positive: 74.8		% Positive: 85.7	% Positive: 80.5	% Positive: 90.3
Luxembourg	PAE: 24 PAS: 3 PCP: - PCT: 1 PNC: 12 PP: - N: 1 P: 40 Total: 45 % Positive: 88.9	PAE: - PAS: - PCP: - PCT: - PNC: - PP: - N: - P: - Total: 0 % Positive: -	n/a	PAE: - PAS: 2 PCP: - PCT: 29 PNC: 16 PP: - N: 15 P: 47 Total: 68 % Positive: 69.1	PAE: - PAS: 6 PCP: - PCT: - PNC: - PP: - N: - P: 6 Total: 6 % Positive: 100
France	PAE: 157 PAS: 696 PCP: 9 PCT: 34 PNC: 420 PP: - N: 175 P: 1316 Total: 1972 % Positive: 66.7	PAE: PAS: 4 PCP: - PCT: - PNC: 21 PP: - N: 21 P: 25 Total: 52 % Positive: 48.1	PAE: 40 PAS: 1191 PCP: 28 PCT: 62 PNC: 191 PP: 113 N: 189 P: 1625 Total: 2090 % Positive: 77.8	n/a	PAE: - PAS: 42 PCP: 33 PCT: - PNC: 18 PP: - N: - P: 93 Total: 105 % Positive: 88.6
Germany	PAE: 10 PAS: 153 PCP: - PCT: - PNC: 56 PP: - N: 29 P: 219 Total: 296 % Positive: 74.0	PAE: - PAS: 33 PCP: 3 PCT: - PNC: 121 PP: - N: 67 P: 160 Total: 262 % Positive: 61.2	PAE: 32 PAS: 748 PCP: - PCT: 2 PNC: 473 PP: - N: 20 P: 1255 Total: 1289 % Positive: 97.4	PAE: 2 PAS: 53 PCP: 1 PCT: 7 PNC: 28 PP: - N: 7 P: 91 Total: 110 % Positive: 82.7	n/a
Total	Total PCP: 10 Total PCT: 49 Total PAE: 196 Total PAS: 1270 Total automatic: 1466 Total general: 968 Total: 3463 Average % Positive: 76	Total PCP: 28 Total PCT: 3 Total PAE: 0 Total PAS: 571 Total automatic: 571 Total general: 540 Total: 1508 Average % Positive: 62.4	Total PCP: 48 Total PCT: 110 Total PAE: 114 Total PAS: 2588 Total automatic: 2702 Total general: 1392 Total: 4811 Average % Positive: 86.5	Total PCP: 31 Total PCT: 74 Total PAE: 16 Total PAS: 805 Total automatic: 821 Total general: 842 Total: 1878 Average % Positive: 81.1	Total PCP: 72 Total PCT: 0 Total PAE: 0 Total PAS: 192 Total automatic: 192 Total general: 363 Total: 606 Average % Positive: 94.7

Data collected by the Task Force Frontaliers[80]

Although somewhat dated, data collected by the Task Force Frontaliers in 2018 (covering the period 1997–2025) highlighted Luxembourg's strong reliance on foreign workers. The overall national rate of positive recognition decisions was 98.8% in Luxembourg, 86.6% in Belgium, 77.9% in France, and only 60% in Germany. According to the study, the lower rate in Germany can partly be explained by the large number of neutral decisions, where cases were put on hold due to missing documents. The study also showed that recognition outcomes vary significantly across the Greater Region. For example, from France to Luxembourg the rate of positive decisions is 99.8%, compared to 40.3% from France to Germany.[81]

Appendix 2:

table: Number of decisions by country 1997-2015 for regulated professions

Pays de la qualification	Country of operation	Decisions taken by the country of exercise	Total positive decisions	% positive decisions	Total negative decisions	Total neutral decisions
Belgium	Luxembourg	2279	2253	98.9 %	26	0
Belgium	France	10338	8098	78.3 %	223	2017
Belgium	Germany	648	358	55.2 %	35	255
Luxembourg	Belgium	285	253	88.8 %	17	15
Luxembourg	France	35	25	71.4 %	5	5
Luxembourg	Germany	147	124	84.4 %	8	15
France	Belgium	5059	4208	83.2 %	355	496
France	Luxembourg	1681	1677	99.8 %	4	0
France	Germany	1191	480	40.3 %	212	499
Germany	France	735	617	83.9 %	25	93
Germany	Luxembourg	2244	2190	97.6 %	54	0
Germany	Belgium	1323	1160	87.7 %	92	71
Total		25965	21443	82.6 %	1056	3466

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[80] Task Force Frontaliers of the Greater Region 2.0, 'Transposition to the Greater Region Directive (EC) on the recognition of professional qualifications – Inventory', 2018, accessed via: https://www.granderegion.net/fr/ia_publication/transposition-dans-la-grande-region-de-la-directive-ce-relative-a-la-reconnaissance-des-qualifications-professionnelles/
[81] *Ibid.*

4. Best practises to facilitate the recognition of professional qualifications in cross-border regions

This chapter will focus on identifying best practises and examples of existing initiatives to facilitate the recognition of professional qualifications in cross-border regions. The practices are divided into three steps, aligned with a citizen's transition from education to the labour market. First, the focus will be on measures to be implemented during education, aimed at aligning education and training systems between two or more countries. Such measures can help bridge differences in qualifications that may otherwise pose obstacles during the recognition process. Secondly, attention will turn to measures that directly support the recognition process itself, including efforts to improve the transparency of skills and competences acquired, in order to facilitate recognition. Finally, measures applicable once the applicant has entered the labour market, such as the facilitation and recognition of lifelong learning, will be addressed.

4.1 Stage 1: Education

Establishing joint programmes and degrees

As noted in Chapter 2, although the process of recognition of professional qualifications has been harmonised through Directive 2005/36, only a relatively small number of professions benefit from automatic recognition. This is a result of varying education and training systems across the EU countries: significant differences may exist between countries regarding how a given profession is regulated, as well as the content and length of the required education and training. These discrepancies can lead to compensation measures, meaning that professionals may be required to complete an exam or undertake additional training up to three years before recognition is granted. One way to bridge differences between training and education systems is for Member States to cooperate in establishing joint programmes or degrees. These programmes feature a jointly developed curriculum that fosters the development of both intercultural and language skills. A joint degree leads to a diploma that is valid and directly recognised in both Member States, enabling students to acquire a diverse set of competences and skills. This not only expands opportunities for students but also makes their qualifications more transparent and valuable for employment in Europe's (cross-border) labour markets, while helping to overcome challenges related to the recognition of professional qualifications.

However, as earlier studies have shown, relatively few joint degrees have been established in Europe so far, mainly due to legal challenges and varying regulations on the design of education programmes. Indeed, according to the Bologna Process Implementation Report of 2018, only about 5% of higher education institutions across the European Higher Education Area award joint degrees.[82] Joint degrees are even less common in disciplines such as medicine and law, which belong to the category of regulated professions.[83] In order to advance the European Education Area, the EU has promoted the

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[82] European Commission, 'The European Higher Education Area in 20: Bologna Process Implementation Report' 2020. Luxembourg: Publications Office of the European Union.

[83] For instance, during one of the pilot projects of the European Degree Label, ITEM identified existing joint programmes across the project consortium as candidates to be piloted. It soon became evident that joint programmes in regulated professions were very limited in number. Instead, the pilot process predominantly consisted of programmes from non-regulated fields, such as the social sciences and humanities.

establishment of more joint degrees across Europe, and even the development of a European degree valid in all Member States. As a first step, in 2022, the European Commission launched an initiative to pilot the concept of a European Degree Label (EDL). These pilot projects served as an initial step in testing how joint European criteria could be applied to recognise that certain international joint programmes between universities provide a distinct European dimension for students. Another objective of the EDL pilots was to explore and facilitate the possibility of creating a "European degree" as a full qualification, rather than merely a label. Building on the pilots, the European Commission published in March 2024 a higher education policy package, consisting of three initiatives designed to foster deeper transnational cooperation among higher education institutions across the EU and to pave the way towards the European degree.[84]

In the Greater Region, the University of the Greater Region (UniGR) stands out as a best-practice example of regional university cooperation and the establishment of joint programmes. UniGR is a network of seven universities in Germany, Belgium, France, and Luxembourg: the University of Kaiserslautern-Landau, the University of Liège, the University of Lorraine, the University of Luxembourg, Saarland University, Trier University, and Saarland University of Applied Sciences as an associated partner.[85] Together, they offer 30 cross-border joint study programmes involving at least two partner institutions, in fields such as engineering, mathematics, the humanities and arts, and the social sciences.[86] In addition, UniGR provides a EurIdentity Certificate as an additional qualification for students who complete an advanced module on selected European topics. This enables students to strengthen their intercultural and language skills through cross-border mobility and study opportunities at a partner university within the UniGR network.[87] A similar option exists for doctoral students, who can obtain the UniGR Doctorate Label, certifying the European dimension of their programme.[88]

In this respect, it should be noted that the recognition of diplomas (academic recognition) differs from the recognition of professional qualifications. Academic recognition concerns the recognition of education for educational purposes, such as determining the level of a qualification, whereas professional recognition relates to access to the labour market. Nevertheless, there are significant overlaps between the two, as the recognition of professional qualifications is also based on the education and diploma obtained by the individual. Within the Benelux Union, automatic recognition of higher education diplomas has been established through a Benelux Treaty, which now extends beyond the three countries to also include Lithuania, Latvia, Estonia, and Poland.[89] A similar agreement, however, has not yet been established for secondary and vocational education, although some countries have concluded bilateral agreements, for instance, between Belgium (Flanders) and

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[84] See also, ITEM Brief 'A European diploma: promoting transnational cooperation in higher education', available via https://crossborderitem.eu/en/item-briefs-11-a-european-diploma-promoting-transnational-cooperation-in-higher-education/.

[85] More information available at: https://www.uni-gr.eu/en/organisation-status

[86] More information available at: https://www.uni-gr.eu/en/studying/crossborder-studying-programmes

[87] More information available at: https://www.uni-gr.eu/en/studying/euridentity-certificate

[88] More information available at: https://www.uni-gr.eu/en/doctorate/unigr-doctorate-label

[89] More information available at:https://www.benelux.int/en/post/poland-has-applied-to-accede-to-the-multilateral-treaty-on-automatic-recognition-of-higher-education-qualifications/

the Netherlands[90], and Belgium (German-speaking Community) and Germany (North Rhine-Westphalia).[91]

Supporting recognition through cross-border training and exchanges

Other common training programmes, modules, exchanges, and internships can also help bridge differences in qualifications. As a result, such experiences may be positively evaluated by competent authorities during the recognition procedure, potentially reducing the need for citizens to complete compensation measures (such as additional training). In addition, these programmes and exchanges help citizens acquire intercultural and Euregional competences, thereby facilitating their integration into neighbouring labour markets.

Several Interreg projects have been launched with similar aims, seeking to enhance cross-border regional university cooperation and promote student mobility. Recently, an Interreg project *CrossCircular* was initiated in the Euregio Meuse-Rhine to establish a network of universities in Belgium, Germany, and the Netherlands (Maastricht University, Open University, Hasselt University, Liège University, and RWTH Aachen University). The project focuses on creating a sustainable framework for interdisciplinary and cross-border education on circularity, forming the basis for a trinational curriculum. Similarly, in the field of green skills and the energy transition, the Interreg project *GreenSkhy*, involving France, the Netherlands, Germany, Luxembourg, Belgium, and Switzerland, seeks to develop new transnational training schemes and reduce obstacles to the European recognition of skills.[92]

Efforts have also been made in the field of secondary and vocational training. In Greater Region, a framework agreement established in 2014 promotes mutual recognition of vocational education and training. The agreement structures cross-border vocational education and training by setting common policy objectives, defining approaches for action, and outlining communication measures to raise awareness and visibility of opportunities for citizens and businesses in the Greater Region. Following the bilateral agreement on cross-border cooperation in vocational training between Saarland (Germany) and Lorraine (France) of 20 June 2014, a broader agreement entered into force in March 2025 between France and Germany, establishing cooperation in the field of cross-border apprenticeships.[93] As a result of these agreements, in France (Sarreguemines), for example, a cross-border vocational training course for electricians has been established, enabling apprentices to access both the German and French labour markets. This means that apprentices are either no longer required to undergo a separate recognition procedure for their qualification, or that such a procedure is carried out in a manner similar to automatic recognition. To achieve this, German requirements were

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[90] More information available at: https://www.vlaanderen.be/met-een-buitenlands-diploma-werken-in-vlaanderen/buitenlandse-diplomas-die-automatisch-erkend-zijn-in-vlaanderen

[91] G*emeinsame Erklärung zur gegenseitigen Anerkennung von schulischen Bildungsabschlüssen und Berechtigungen zwischen der Deutschsprachigen Gemeinschaft Belgiens und dem Land Nordrhein-Westfalen,* more information available at: https://ostbelgienbildung.be/desktopdefault.aspx/tabid-7784/12950_read-71408/

[92] More information available at: https://greenskhy.nweurope.eu/

[93] *Décret n° 2025-280 du 25 mars 2025 portant publication de l'accord entre le Gouvernement de la République française et le Gouvernement de la République fédérale d'Allemagne relatif à l'apprentissage transfrontalier, signé à Lauterbourg le 21 juillet 2023,* https://www.legifrance.gouv.fr/loda/id/JORFTEXT000051381049/.

taken into account, and two additional modules were integrated into the training programme.[94] The Interreg project *FagA/CAMT* in the Greater Region aimed to provide students at vocational schools in Saarland, West Palatinate, and Lorraine with mobility opportunities in neighbouring countries to improve their employability on the cross-border labour market, for example, through internships in companies located across the border.[95]   A current Interreg project in the Greater Region, *PRO-MOTION'GR*, builds on this by offering cross-border opportunities that bring together young people in vocational training, teachers, and companies, while fostering exchange among them.[96] Between Germany and the Netherlands, knowledge partners participating in the *Rijnland Instituut* have explored the development of a binational vocational curriculum in the trade and IT sectors. This initiative aims to equip vocational students with so-called "Euregional competences", thereby enhancing their ability to secure employment in both the Netherlands and Germany after completing their studies.[97]   Likewise, in Belgium (Flanders) and the Netherlands, a cooperation agreement has been signed between the Department of Work and Social Economy (DWSE) and the Cooperation Organisation for Vocational Education, Training and the Labour Market (SBB). This agreement allows Flemish students in dual learning to access work placements in the Netherlands. For students at Flemish educational or training institutions in the border region, this means that training companies across the border are now also available as part of their learning pathway.[98] The Interreg-project *Euregionaal doorlopende leerlijn* (Euregional continuous learning pathway) strive to facilitate and enable the connection between Dutch and German schools and to realize joint projects and exchanges.[99]

Issuing multilingual diplomas, supplements and certificates

After students graduate from a study programme, there is added value in issuing diplomas and accompanying documents in multiple (Euregional) languages. At present, higher education diplomas are often issued in English alongside the national language, but this is less common in secondary and vocational education. Multilingual diplomas are not only important for applications for the recognition of professional qualifications, but they also enhance transparency for future employers by clearly reflecting the skills and competences obtained. In addition to the diploma itself, diploma supplements provide detailed information about the study programme, which is particularly valuable for both employers and competent authorities when assessing and comparing qualifications. Finally, issuing documents in multiple languages would help to reduce the translation burden and associated costs that applicants can be currently required to bear. On the other side, this would also require that competent authorities accept documentations in multiple languages.

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[94] Task Force Frontaliers of the Greater Region 2.0, 'Transposition to the Greater Region Directive (EC) on the recognition of professional qualifications – Inventory', 2018, accessed via: https://www.granderegion.net/fr/ia_publication/transposition-dans-la-grande-region-de-la-directive-ce-relative-a-la-reconnaissance-des-qualifications-professionnelles/

[95] More information available at: https://interreg-gr.eu/de/project/faga-camt-de/

[96] More information available at: https://interreg-gr.eu/de/project/pro-motion-gr-de/

[97] More information available at: https://rijnlandinstituut.eu/projecten/360-arbeidsmarkt-binationale-mbo-curricula/

[98] More information available at:
https://assets.vlaanderen.be/image/upload/v1720436407/Infofiche_voor_de_trajectbegeleider_-_Interregionale_mobiliteit_Nederland.pdf

[99] More information available at: https://www.euregio.eu/wat-we-doen/maatschappelijke-ontwikkeling/ed

In Europe, the transparency of qualifications is promoted through Europass. Europass provides citizens a 'skills passport' with tools to record their skills, work experience, and qualifications, including a standardised CV format. It also offers a diploma supplement for higher education degrees, which contains detailed information about courses, the content of training, and the national education system. A similar instrument exists for vocational education, known as the certificate supplement. However, the extent to which these tools are used varies considerably between countries.[100] Belgium (Flanders) provides an example of good practise, where certificate supplements are available online for multiple professions, also available in multiple languages (Dutch, French, English and German).[101] In Belgium (Wallonia) training profiles are produced guaranteeing consistency in skills and training and the skills required by employers.[102]

4.2 Stage 2: Obtaining recognition of professional qualifications

Promoting mutual recognition

The most evident solution to obstacles in the recognition of professional qualifications is to establish broader automatic recognition, i.e. mutual recognition. This would mean that a qualification obtained in one country is automatically recognised in another, eliminating the need for lengthy procedures to compare qualifications and impose possible compensation measures, such as additional training. At present, only a limited number of professions benefit from automatic recognition at the EU level. Examples of mutual recognition are even rarer in bilateral or cross-border regional agreements. Reaching such mutual recognition is often complicated by differences in training and education systems. A practical step in cross-border regions would be to select specific professions, compare their education and training requirements, and identify similarities and commonalities. If sufficient alignment is found, this could serve as a basis for mutual recognition.

The 2013 amendment of the Directive introduced a new mechanism to facilitate automatic recognition: common training principles, which can be established either through common training frameworks or through a common training test. To this date, however, only one common training test has been established, namely for ski instructors. The limited use of this system can be explained by the difficulty of aligning training requirements across countries and by the high threshold set in the Directive: at least one third of Member States (currently nine) must agree in order to introduce such a system. At the moment, this system is therefore of limited practical use for cross-border regional cooperation. Lowering this threshold would be highly beneficial, particularly for cross-border regions with high mobility such as the Benelux. For these countries, achieving mutual recognition and identifying differences would be much more realistic with only three countries involved rather than nine. Such a change, however, would require an amendment of the Directive.

Mutual recognition can also be achieved through forms of special label or certificate to indicate harmonisation and recognition of professional qualifications. For instance, within the field of Engineering, the 'EUR ING Certificate' provided by Engineers Europe overcomes the obstacles on

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recognition by providing a competency certificate for professional engineers, aiming to facilitate the mobility of practicing engineers within and beyond the geographical scope represented by the organizations' member countries, establishing a framework for mutual recognition of qualifications.[103]

Comparability of professions' education and training

For professions covered by the general system of recognition, authorities must compare the qualifications obtained by citizens in their home country with the qualifications required in the host country. This comparative exercise can be time-consuming. Moreover, for employers hiring workers from across the border, it is often unclear how qualifications differ between countries. It is therefore beneficial if such comparisons are made in advance between countries for specific professions, as this can also accelerate the recognition process. An example is the Interreg project Ler(n)ende Euregio, a collaboration between Germany and the Netherlands, which developed "Authorised Descriptions" to improve transparency in qualifications. These descriptions compare selected professions on the basis of training and competencies.[104] Similar descriptions have also been created between Belgium and the Netherlands.[105]

Enforcing common trust and principle of mutual recognition under Directive 2005/36

It should be recalled that the EU Directive is founded on the principle of mutual recognition and mutual trust between Member States: a qualification that is valid in one country should, in principle, be valid in another, in line with the principles of free movement. Compensation measures, such as requiring additional training or an exam before recognition is granted, are intended to be exceptions to this rule.[106] However, as highlighted in the Directive's evaluation reports and the European Court of Auditors' review, Member States continue to carry out more checks and request more documentation than the Directive allows. In practice, exceptions risk becoming the rule, which runs counter to the very objectives of the Directive.

As discussed in Chapter 3, there are cases of non-compliance with the Directive, and the European Court of Auditors (ECA) has identified that its mechanisms have not been effectively implemented in all Member States. Efforts should therefore be undertaken to bring national systems fully in line with the Directive. The ECA has also recommended greater use of electronic procedures, such as the IMI system and the European Professional Card, which could significantly accelerate the recognition process. In addition, the ECA has suggested shortening the decision-making period for automatic recognition from three months to two, a change that would particularly benefit mobile citizens in cross-border regions as well as service providers needing to hire workers quickly. Furthermore, it would be useful if language requirements were applied more flexibly. This concerns, for instance, the demand for certified translations or mandatory language tests. Citizens living in border areas often possess sufficient language proficiency through everyday practice, for example, growing up in a bilingual family, and completing education in the neighbouring languages.

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[103] More information available at: https://www.engineerseurope.com/what-eur-ing-certificate

[104] More information available at: https://lerende-euregio.com/geautoriseerde-beschrijvingen/

[105] More information available at: https://www.kbanijmegen.nl/doc/pdf/GB-Zorgkundige-Verzorgende-IG.pdf

[106] See also Chapter 3.1.3, Kortese, L, 'The Recognition of Qualifications in the EU: Blurring the Lines of Competences between the Internal Market and Education' 2020. Maastricht University. https://doi.org/10.26481/dis.20200528lk

Information provision

A key element for transparent and effective recognition procedures is the provision of clear and accessible information. As discussed earlier in this report, the lack of adequate information remains one of the biggest obstacles for both citizens and employers, often delaying the recognition process. While a considerable amount of information is already available, it is scattered across multiple websites, not always up to date, and frequently not accessible in multiple languages. As a result, citizens often struggle to identify which information applies to their individual case.

In cross-border regions in particular, there would be great added value in centralising information in a 'one-stop shop' format. A central web portal, for instance hosted by the Benelux Union, could serve this purpose by collecting relevant information on the recognition of professional qualifications and providing direct links to the national websites of the countries concerned. Such a portal should target not only citizens but also employers in the region. In fact, such a portal already exists (*Startpuntgrensarbeid*) provided by the Benelux Union for cross-border work.[107] However, similar to the information provided by Cross-Border Information Points, the content remains very general and not sufficiently tailored to individual cases, although Interreg-project such as the *UNLOCK personnel across borders* have been undertaken to improve information provision.[108] At national level, the German Recognition Portal (*Anerkennung in Deutschland*) offers a best practice example, providing citizens and employers with clear information and a tool to access profession-specific details, such as whether it is regulated, the applicable recognition conditions, and the competent authority to contact.[109] Also in context of information provision, factsheets, such as those developed by ITEM in an earlier B-Solutions project, have proven valuable. These factsheets provide applicants with clear guidance on the recognition of qualifications between two countries, including information on the competent authority, the documents to be submitted (and in which languages), and any additional requirements such as language tests.

Beyond (online) information provision, the Task Force Frontaliers has, for example, suggested that applicants could benefit from being accompanied by a single contact person throughout the entire recognition procedure, while also receiving a dedicated leaflet outlining the necessary documents.[110] Although such personalised support may not be realistic in the short term, it would be highly valuable if a dedicated service were established in cross-border regions to guide applicants through the recognition process, drawing on knowledge of both national systems involved.

Finally, information exchange is not only crucial for citizens and employers but also for competent authorities handling recognition applications. The establishment of common networks and bilateral information sessions between professional bodies and competent authorities could prove beneficial in this regard. Furthermore, creating a form of 'precedent' or 'jurisprudence' database by documenting recognition decisions for certain professions would provide guidance for future applications. This

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[107] See: https://startpuntgrensarbeid.benelux.int/nl/

[108] More information available at: https://keep.eu/projects/17565/UNLOCK-EN/

[109] See: https://www.anerkennung-in-deutschland.de/en/interest/finder/profession?query=

[110] Task Force Frontaliers of the Greater Region 2.0, 'Transposition to the Greater Region Directive (EC) on the recognition of professional qualifications – Inventory', 2018, accessed via: https://www.granderegion.net/fr/ia_publication/transposition-dans-la-grande-region-de-la-directive-ce-relative-a-la-reconnaissance-des-qualifications-professionnelles/, p. 37.

would mean that authorities and applicants would not have to start from scratch in comparing qualifications each time, thereby streamlining and speeding up the process.

4.3 Stage 3: Entering the labour market

Acquiring Euregional competences, language skills, and other cross-border skills is not only important for students during their education but also for citizens once they have entered the labour market, whether as workers or job seekers, in order to further develop their skills. In some professions, such as healthcare, there are even formal requirements to upkeep professional competences (continuing professional development, CPD). The Directive notes that "Member States shall, in accordance with the procedures specific to each Member State, ensure, by encouraging continuous professional development, that professionals […] are able to update their knowledge, skills and competences in order to maintain a safe and effective practice and keep abreast of professional developments."[111] This means that the Member States are responsible on whether and what kind of CPD training they require, and whether it has to be accredited. This can also have implications for citizens active at cross-border labour markets. It is therefore important that Member States also recognise periods of continuous professional development undertaken abroad, particularly for professionals who work and complete such training across the border.

Lifelong learning therefore plays a crucial role in supporting mobility and employability in cross-border labour markets. In recent years, the Greater Region has placed strong emphasis on lifelong learning. The Task Force Frontaliers has highlighted several best practices in this field. For example, the Moselle Est/Saarland–Rhineland-Palatinate Cross-Border Placement Service (SPT) formalises cooperation through a local agreement, with a strong focus on cross-border continuing education. This includes dual certifications or training modules dedicated to the neighbouring country, often commissioned by public employment services. Employment services also facilitate access to training in a worker's former country of employment. The Cross-Border Placement Services, created in 2013 through cooperation between France Travail and the Bundesagentur für Arbeit, provide targeted support to job seekers and employers in the French-German border region. They offer job seekers preparation, personalised advice, and information on employment opportunities, while businesses benefit from cross-posting of vacancies, targeted recruitment support, labour market insights, and guidance on recognition of qualifications.[112]

Also, at the stage when citizens are active in the labour market, secondments and professional exchanges across borders can be highly beneficial for individuals wishing to pursue cross-border employment later on, as such experiences help bridge differences in qualifications. Consequently, these exchanges may be positively considered by competent authorities during the recognition procedure, potentially reducing the need for compensation measures such as additional training. The Directive's system on temporary mobility can also play a role here, as it allows citizens to work on a temporary and occasional basis across borders through a lighter procedure than that required for permanent mobility.

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[111] Art. 22(b) Directive 2005/36.

[112] Task Force Frontaliers, 'Formation professionnelle continue en Grande Région Etat des lieux Septembre' 2024, accessed via: https://www.arbeitskammer.de/fileadmin/user_upload/---------------AK_Download_Datenbank------------/AK-Themenportale/Task_Force_Grenzgaenger/Veroeffentlichungen_FRZ_der_TFG/Dossire_FR_web.pdf

5. Evaluation of the research themes: impact to European Integration, Sustainable/Socio-Economic Development and Euregional Cohesion

European Integration

Under the research theme European Integration, this study aimed to evaluate the cross-border impact of EU Directive 2005/36 on recognition of professional qualifications, namely what obstacles remain for citizens and institutions as well as service providers in cross-border regions. In this regard, the study not only discussed obstacles identified in previous research but also updated the findings through a survey. The results show that multiple challenges still persist in the recognition of professional qualifications, affecting both citizens and employers in border regions. Only a few cases concerned legal obstacles, such as non-compliance with the Directive, while most obstacles stemmed from practical challenges in applying the rules, such as complex procedures, lengthy recognition processes, and lack of clear information.

The obstacles identified can be categorised in two categories: obstacles that hinder the whole EU internal market (and European-wide mobility) and obstacles that have specific implications in mobility in cross-border regions (see Table 3). Indeed, while this study focuses on (cross-)border regions, it should be noted that the legal framework on the recognition of qualifications also applies in a broader EU-wide and transnational context, i.e. not only to (cross-) border workers in border areas. However, obstacles may be experienced differently in border regions, particularly in the context labour mobility in cross-border labour markets. An example is the persistence of obstacles related to lengthy recognition procedures and the requirement to complete additional training or tests before recognition is granted. Such long procedures are especially problematic in cross-border regions, as they may discourage cross-border employment and create difficulties for employers and service providers who urgently need to hire staff. While a person relocating within the EU may be able to wait a few months for a recognition decision, such delays can place (cross-)border workers at a disadvantage. In these cases, employers may prefer to hire workers from their own country if recognition procedures for professionals from across the border take too long. Likewise, citizens with years of work experience in their home country may be discouraged from cross-border mobility if required to complete extensive additional training. Further complications may arise when professionals are subject to a two-step procedure, as is the case for medical specialists, and where recognition and access to the labour market (e.g., registration in a professional registry) are handled through separate processes, making the overall procedure even longer. Accelerating these procedures is therefore key to enabling (cross-)border workers to access neighbouring labour markets. The current European legislation on recognition of professional qualifications contains no special provisions for professionals in cross-border regions: it may be concluded that the system does not fully meet the needs of cross-border regions.

Next to the lengthy procedures, other obstacles identified stem from the lack of automatic recognition and harmonisation between countries. Respondents to the survey also linked the issue of harmonisation to the principle of free movement in Europe, stressing that the freedom of movement of workers and the functioning of the EU internal market continue to be challenged by recognition requirements. For example, due to non-harmonised education and training systems, only few professions benefit from automatic recognition, while most fall under the general system.

Furthermore, this general system, with its case-by-case approach to evaluating the comparability of qualifications between countries, remains a burdensome exercise for both authorities and professionals. Looking at the cross-border perspective, tools introduced to promote automatic recognition, such as the common training principles added in the 2013 amendment of the Directive, are not effective in cross-border regions, since they require agreement by at least nine Member States. However, the lack of harmonisation and limited automatic recognition is not only a consequence of EU-wide action, but also a result of insufficient bilateral or cross-border regional initiatives to establish mutual recognition agreements.

Obstacles affecting both cross-border regions and the EU internal market include the lack of clear and transparent information, which emerged as one of the most prevalent challenges. Difficulties in finding accurate information on recognition procedures, such as identifying the correct authority and understanding the rules applicable to their individual case, were the most frequently mentioned obstacles among both institutions and citizens with experience of the procedure. This issue was also repeatedly highlighted in the open-ended survey responses, which referred to concerns over 'information accessibility, clarity, transparency, and support.' Citizens are often unsure whether they require professional or academic recognition, or whether their profession is regulated at all. In federal countries, this is further complicated by uncertainty about which district authority is competent. Respondents noted that unclear document requirements, and authorities deeming submissions insufficient, contributed to lengthy processing times.

Additional challenges in cross-border regions include requirements to provide documents in a specific language and strict language proficiency rules. Language requirements in particular may create barriers to accessing a profession, especially when authorities require certified documents or only accept certain types of exams. This poses a challenge for citizens who, for example, have learned a language through family or grown up in a multilingual environment – common in cross-border regions – but do not hold the formal certificates required to prove their proficiency. Other challenges in border regions relate to obstacles typical to cross-border work: with respect to obtaining professional liability insurance when working across the border, as well as social security and taxation matters.

Finally, the lack of common rules for third-country nationals (TCNs), who generally fall outside the Directive's scope, poses challenges for employers and citizens, particularly given EU-wide labour and skills shortages. Limited knowledge of third-country education systems and the lack of uniform regulatory frameworks hinder both TCNs and employers in attracting qualified workers from outside the EU. This results in uncertainty, additional costs, and delays in recognition procedures.

Table 3: Summary of obstacles

Obstacles to the whole EU internal market	Specific for (cross-)border regions
- Lack of harmonisation of training and education systems - Only a small number of professions benefit from automatic recognition	- Border regional level: lack of mutual recognition agreements and trust in each other's training systems 'Common training principles' system to promote automatic recognition: unsuitable for cross-border regions
- Long decision-making period for recognition applications - General system of recognition remains a burdensome exercise for both authorities and professionals - System of temporary mobility only used to a limited extent, administrative requirements could be further simplified - Limited use of electronic procedures	- Requirements to complete compensation measures (exam or additional training) before recognition granted - Recent graduates may face obstacles since the procedure can last up for 4 months but the procedure can only be initiated when documents required for the application - Two-step procedure for recognition and access to the labour market - Two-step procedure for medical specialists
Lack of clear information and understanding of complex rules	Lack of information on the interaction of rules in cross-border regions, and limited availability of information in multiple languages
Non-compliance with the EU Directive: system of temporary mobility, some authorities require more documents and perform more checks than the Directive allow for	Also, infringement proceedings against France, Germany, Belgium, Luxembourg and the Netherlands
No common or uniform rules on recognition of qualifications of third-country nationals	
Language requirements and costs	- Requirement to pass specific exams as proof of language proficiency - Costs and administrative burden involved in obtaining (certified) translations of documents
Accreditation and recognition of continuous professional development carried out in another country	
	As recognition of qualifications is linked with (cross-border) work across the border, obstacles have also been reported with respect to social security and taxation, and obtaining professional liability insurance

Sustainable Development/Socio-Economic Development

Under the theme Sustainable Development/Socio-Economic Development, the study explored the establishment of services in cross-border regions. It evaluated whether services can be established in the same way in border regions as in national centres, and to what extent workers can effectively access the (cross-border) labour market. Also, statistics on recognition decisions were analysed to provide insight into mobility flows and to identify where recognition remains challenging.

The study found that smooth recognition of professional qualifications is crucial for employers and service providers in border regions, as it allows them to hire workers from neighbouring areas and tap into a larger pool of workers and talent. This contributes to strengthening regional economies and promoting sustainable socio-economic development by creating more employment opportunities in border areas. The possibility to easily hire workers neighbouring regions is also crucial for service providers aiming to collaborate and establish joint services across borders. Indeed, slow or complex recognition procedures have been reported to hinder cross-border economic activity, reduce competition, and limit professional opportunities for people living in border regions. Indeed, many respondents to the survey highlighted that employers often need to hire workers immediately but face uncertainty over whether diplomas will be recognised at all. Several respondents stressed that, especially given current labour shortages, procedures should be made more flexible and efficient.

In the survey, the respondents highlighted that these difficulties and need to have efficient recruiting of professionals emerge especially in healthcare, education, childcare, and industrial sectors. The study also noted examples from both education and healthcare sectors, where cross-border cooperation and establishment of joint services are hindered by the obstacles on recognition of professional qualifications. Examples from the education sector show that recognition of professional qualifications remains a major barrier to cross-border cooperation, such as development of bilingual and/or binational schools, study programmes, childcare, and the mobility of students in context of apprenticeships. In the healthcare sector, cross-border cooperation is increasingly necessary to address demographic changes and the centralisation of specialised services, yet recognition of professional qualifications remains a major barrier delaying or preventing the mobility of healthcare professionals, undermining efforts to establish joint healthcare services and to exchange personnel.

The study also analysed recognition statistics to shed light on cross-border mobility between the Benelux countries, Germany, and France. By comparing the number of applications and the rate of positive recognition decisions, it sought to identify where recognition procedures run smoothly and where significant challenges remain. Luxembourg stands out with both the highest number of applications and the highest rate of positive decisions, reflecting its strong reliance on cross-border workers. The Netherlands consistently shows the lowest positive recognition rates among the five countries, particularly in mobility flows with Belgium, France, and Germany. In mobility between Belgium and the Netherlands only around 75% of applications resulted in positive recognition decision. Statistics collected by Task Force Frontaliers also indicate that recognition outcomes vary widely across the Greater Region, with some flows (e.g. France to Luxembourg) showing almost no negative decisions, while others (e.g. France to Germany) face substantial barriers. Overall, the data suggest that recognition outcomes vary significantly between countries. It is difficult to determine the exact reasons for these differences; however, higher positive decision rates may occur where education and training systems are more aligned or where cross-border labour flows are already well established (e.g. Luxembourg), and lower rates where systems potentially diverge more strongly or where language barriers exist (e.g. France–Netherlands, France–Germany).

Euregional Cohesion

Under the theme of Euregional Cohesion, the study examined solutions to facilitate the recognition of professional qualifications and address obstacles in cross-border regions. These were structured into three stages reflecting a citizen's path from education, to obtaining recognition, to accessing the labour market, with existing cross-border initiatives and best practices identified at each stage. The study

found multiple examples of cross-border initiatives and projects involving Luxembourg, Belgium, the Netherlands, Germany, and France. However, such best practices remain fragmented, often limited to bilateral initiatives or project-based efforts.

The first stage focused on measures implemented during education, aimed at aligning education and training systems between countries. Such initiatives help bridge differences in qualifications that might otherwise hinder recognition. A key solution is the creation of joint programmes or degrees, which is also a priority of the EU in advancing the European Education Area. Although relatively few joint degrees have been established so far due to legal and regulatory differences, some best-practice examples exist. In the Greater Region, the University of the Greater Region (UniGR) offers joint programmes as a model of regional cooperation. Interreg projects such as CrossCircular have also demonstrated increasing cooperation, for example by creating trinational higher education networks and curricula. Also, other common training programmes, exchanges, and internships can likewise help bridge differences in qualifications and may be positively considered by competent authorities during recognition procedures, reducing the need for compensation measures. They also help citizens acquire intercultural and cross-border competences, making them better prepared for employment in neighbouring labour markets. In the Greater Region, a framework agreement concluded in 2014 promotes mutual recognition of vocational education and training, while in France and Germany cooperation on cross-border apprenticeships supports employability through internships in companies located across the border. It was also noted that recognition of diplomas for academic purposes differs from the recognition of professional qualifications, which relates to access to the labour market, although significant overlaps exist as professional recognition is also based on educational qualifications. Within the Benelux Union, automatic recognition of higher education diplomas has been established through a treaty, but similar agreements for secondary and vocational education are lacking, with only some bilateral arrangements in place. Added value also lies in issuing diplomas and accompanying documents in multiple (Euregional) languages, which not only facilitates recognition procedures but also provides greater transparency for employers. Multilingual diploma supplements detailing course content and competences would help employers and competent authorities assess qualifications more easily and would reduce translation costs for applicants, provided that authorities accept documents in multiple languages.

The second stage related to measures that directly support the recognition process itself, particularly efforts to improve transparency of skills and competences and establishing mutual recognition. The most effective long-term solution is broader automatic recognition, meaning that qualifications obtained in one country would be recognised in another without lengthy procedures or compensation measures. Currently, only a limited number of professions benefit from automatic recognition at EU level, and bilateral or regional mutual agreements are rare due to differences in training systems. A practical approach in cross-border regions would be to select specific professions, compare their education and training requirements, and identify similarities that could form the basis for mutual recognition. Interreg projects such as Ler(n)ende Euregio, which developed "Authorised Descriptions" comparing professions on the basis of training and competencies, illustrate how transparency can be improved and recognition accelerated.

Regarding information provision, in (cross-)border regions, there would be added value in centralising information in a one-stop-shop portal, for example hosted by the Benelux Union, to provide citizens and employers with clear guidance on the interaction of the rules in multiple countries and languages. Factsheets have already proven useful in offering step-by-step instructions for citizens, while

additional personalised support, such as a single contact person guiding applicants through the recognition process, would further improve accessibility. Information exchange should also target competent authorities themselves, through networks, bilateral sessions, or even a database documenting past recognition decisions, which would provide valuable precedents for future cases.

The third stage regarded measures once citizens have entered the labour market, such as the facilitation and recognition of lifelong learning. Acquiring cross-border competences, language skills, and intercultural experience is not only important during education but also throughout a person's career. In some professions, particularly in healthcare, continuous professional development is mandatory, making recognition of training undertaken across the border even more important. Professional exchanges and secondments across borders can help bridge qualification differences and may be viewed positively in recognition procedures, reducing the need for additional training. The Directive's provisions on temporary mobility can also play a role, as they allow citizens to work on a temporary or occasional basis across borders through a lighter procedure than that required for permanent mobility.

Thus, the study shows that although many promising best practices exist to overcome recognition obstacles, such as joint degrees and programmes, Interreg projects, and bilateral agreements, these remain fragmented, often limited to project-based or local initiatives. There is considerable potential to broaden these initiatives by involving additional countries within a cross-border region and by making them structural through formal arrangements, such as multilateral (mutual recognition) agreements or institutionalised cooperation frameworks. Indeed, currently the Euregional cohesion and cross-border cooperation of education institutions, employers, municipalities, hospitals, is hindered by the complex recognition procedure, meaning that these institutions cannot fully benefit from cross-border workforce.

6. Conclusions and recommendations from a Euregional perspective

This ITEM Cross-Border Impact Assessment study confirms that, nearly a decade after the previous ITEM assessment, the recognition of professional qualifications continues to represent an obstacle to labour mobility in the EU, and particularly in (cross-)border regions. Despite the existence of a uniform EU procedure for recognising professional qualifications (Directive 2005/36, as modernised by Directive 2013/55), the development of a genuine 360° cross-border labour market — where citizens can move freely, employers can hire seamlessly, and institutions can establish joint services and cross-border cooperation — remains hindered by lengthy, complex procedures and a lack of harmonisation across Member States, including Luxembourg, Belgium, the Netherlands, Germany, and France. These cases show that recognition is not only a challenge for individual citizens but also a barrier for employers and the development of cross-border cooperation and joint services with socio-economic consequences for (cross-)border regions.

The study highlights that challenges in the recognition of professional qualifications are not only rooted in EU-wide legislation but also in the limited development of bi/multilateral and regional agreements such as mutual recognition. While these obstacles affect the EU internal market and European integration as a whole, they are particularly acute in border regions, where lengthy procedures and additional training requirements discourage cross-border mobility and complicate recruitment for employers and service providers. In this regard, it can be concluded that while Directive 2005/36 provides a solid framework for facilitating professional mobility across the EU, it is better suited to transnational mobility and does not adequately address the challenges encountered in cross-border regions. The lengthy recognition procedures, additional training requirements, and two-step processes, such as those for medical specialists, can disproportionately hinder mobility in border areas, where rapid access to the labour market is often crucial. Streamlining and accelerating recognition processes is therefore essential to strengthen cross-border labour markets, support cross-border cooperation and joint service provision, and in unlocking the socio-economic potential and deepening cohesion in cross-border regions. In this respect, the study identified best practices and innovative solutions that could provide a way forward. These include joint degrees and bi/multinational study programmes, multilingual diplomas and supplements, cross-border apprenticeships, and tools to promote transparency of skills and qualifications. However, such initiatives remain fragmented, often limited to bilateral projects or pilot efforts. Their potential to reduce barriers and strengthen Euregional labour markets is clear but scaling them up requires stronger structural frameworks and political will.

Taken together, the findings point to three overarching conclusions. As the EU Directive is based on mutual recognition and trust, this principle should guide the common mindset, with compensation measures such as additional training or exams applied only as exceptions. Recognition procedures must become faster, clearer, and more transparent, particularly in (cross-)border regions where labour markets are highly integrated and where delays can directly harm both workers and employers. Second, harmonisation efforts need to be reinforced, through broader use of automatic recognition, bilateral and regional agreements, and practical alignment of training and education systems. This could be achieved through cooperation between countries, for example within the Benelux Union, by identifying professions to compare and, where strong similarities in training and education are found,

paving the way for mutual recognition. Third, other best practices must be scaled beyond project-based or local initiatives to create durable, structural solutions, supported at both regional and EU level. The recognition of professional qualifications remains a key factor for the integration and the functioning of the EU internal market as well as functioning integrated 360° cross-border labour market.

Looking ahead, this study also highlights the difficulty of collecting comprehensive information on obstacles and best practises to recognition, as most findings are drawn from case studies or individual reports. This represents a research limitation of the present report. Further research, particularly direct engagement with competent authorities in border regions responsible for recognition decisions, would provide valuable insights into the extent to which these obstacles are experienced in practice. In this context, the forthcoming evaluation report of the European Commission on the Directive, expected at the end of this year, will be highly anticipated.

Table 4: Summary of obstacles and measures to facilitate recognition of professional qualifications in (cross-)border regions

Obstacles	Measures to tackle the obstacle & Actors involved

• Lack of harmonisation
 	
• Limited number of professionals benefitting from automatic recognition
 	
• Requirement to complete additional training/tests
	• On the level of Member States:
	  o Selection of professions to be compared, where similarities found, establishing bi/multilateral mutual recognition agreements
	  o Establishing joint degrees and other forms of study programmes and exchanges, promoting learning of 'Euregional competences' and neighbouring languages
	  o Expanding automatic recognition of diplomas in higher education to secondary and vocational education
	
	• EU level:
	  o Lowering threshold of participating countries in 'Common training principles'
	  o Funding opportunities for establishing joint degrees and pilot projects

• Lack of transparency of skills and qualifications	• On the level of Member States: Issuing and accepting multilingual diplomas and accompanying document such as diploma/certificate supplements pursuant to the EU format (Europass)

• Inefficient use and lack of implementation of Directive 2005/36	• On the level of Member States:
	  o Bringing national systems aligned with the EU Directive
	  o Reducing requirements of certified translations or specific tests to prove language proficiency
	  o Promoting principle of mutual recognition and trust in recognition decisions

• Long recognition procedures	• EU level: shortening decision-making periods under the Directive
	• On the level of Member States:
	  o Making efficient use of electronic tools in exchange of information
	  o Creating databases of precedent recognition decisions

	- Studies on comparability of professions' education and training - Faster processing of applications - Streamlining procedures that are currently split into two separate steps (recognition and access to the labour market), particularly for medical specialists
• Lack of clear and transparent information	• On the level of Member States: - Centralising information in a 'one-stop shop' format—for example, a bilingual web portal between the Benelux countries that combines details of national systems and rules with practical guidance for cross-border regions, tailored to both citizens and employers - Establishment of common networks and bilateral information exchanges for competent authorities, education and training institutions
• No uniform procedure TCNs	• EU and Member States level: establishing common rules to TCNs, for instance by expanding scope of Directive 2005/36 to TCNs

Annex I. Survey questions

ITEM is an Expertise Center at Maastricht University (UM) on cross-border mobility and cooperation. ITEM is actively collaborating with its stakeholders to improve policies affecting border regions, for instance via annual 'ITEM Cross-border Impact Assessments' which evaluate the effects of new policies and legislation on cross-border regions, drafting advice for policymakers.

This survey focuses on the recognition of professional qualifications. Before starting work in another Member State, citizens may need to have their professional qualifications (education/training) officially recognized pursuant to Directive 2005/36. While some obstacles have been identified, more information is needed to understand where citizens encounter difficulties with cross-border mobility and recognition of their professional qualifications. The survey targets both citizens who have experience with the recognition of their qualifications and institutions, organisations or businesses that either deal with labour mobility/recognition questions from citizens or employers. The results of this survey will be used to update the ITEM Cross-border Impact Assessment from 2016 which will focus on the perspective of (cross-)border regions between Belgium, the Netherlands, Luxembourg, Germany, and France.

This survey is conducted in collaboration with students as part of a student project within the 'European Studies' program at UM. The survey is available in Dutch, French, German, Luxembourgish and English. Completing the survey will take approximately 5 minutes. Please complete the survey before 16st March.

Do you consent to the processing of your survey responses (anonymously) for the purposes of this research?

Yes/No

1. **In what language would you like to answer this survey?**

   o   Dutch

   o   English

   o   French

   o   German

   o   Luxembourgish

2. **Are you answering this survey as a citizen or as an institution/organisation?**

   o   Citizen

   o   Institution/organisation

Questions for citizens

3. **Do you have experience applying for recognition of your professional qualifications when seeking to work in another Member State or region?**

   o   Yes

   o   No

4. **For which profession have you sought recognition?**

    o   (Open field)

Information about the procedure for recognition of professional qualifications

Before applying for recognition of your professional qualifications abroad, you likely gathered information about the application process. We would like to ask you about this phase.

(Please indicate how much you agree with the following statements)

5. **I found it easy to find information regarding recognition of professional qualifications applicable to me**

    o   Strongly disagree

    o   Disagree

    o   Neutral

    o   Agree

    o   Strongly agree

6. **The information about the application process was clear to me, including where to submit my application and which documents were required.**

    o   Strongly disagree

    o   Disagree

    o   Neutral

    o   Agree

    o   Strongly agree

Application Process

After gathering information, you proceeded with the application process. We would like to ask you questions about this stage

7. **How did you apply? Please select all that apply.**

    o   Digitally

    o   By post

    o   By phone

    o   In-person

    o   Through a representative

8. **How long was the processing (decision) time of your application?**

    o   Less than 2 months

    o   2 to 4 months

    o   More than 4 months

    o   I don't remember

9.   **How did you feel about the length of the processing time?**

    o   Very negative

    o   Negative

    o   Neutral

    o   Positive

    o   Very positive

Result of the Decision

After completing the application, you received a decision on the recognition of your qualifications. We would like to ask about this outcome.

10.   **What decision did you receive? (In case of multiple applications, please select all outcomes)**

    o   Positive decision on recognition

    o   Conditional recognition (e.g. having to undergo additional training or tests before obtaining recognition)

    o   Refusal

11.   **Did the requirement to complete additional training or exams discourage you from starting work in another Member State or region?**

    o   Yes, very much

    o   Yes, somewhat

    o   Neutral

    o   No, not really

    o   No, not at all

12.   **Did the decision clearly explain the reasons why the recognition was refused?**

    o   Yes

    o   No

The Overall Process

Next, we would like to ask you some questions about how you experienced the overall process and how it could possibly be improved.

13.   **Overall, how satisfied were you with the entire application process?**

o   Very unsatisfied

o   Unsatisfied

o   Neutral

o   Satisfied

o   Very satisfied

14.   **Please select all options you felt, <u>hindered</u> you in the recognition process.**

o   Uncertainty about whether the recognition process is mandatory

o   Difficulty identifying the correct authority to contact

o   Challenges finding information about the application process

o   Documents only accepted in certain languages: having to translate documents (e.g., diplomas)

o   Costs associated with the application

o   Lengthy decision-making process (it takes a long time to get a decision)

o   Requirement to complete additional training or tests before recognition is granted

o   Requirement to demonstrate a certain language proficiency

o   None of the above

15.   **Please indicate the priority level of the obstacles you selected, ranking them from the most to the least urgent to improve.**

o   (Rank order)

16.   **Did these (or other) obstacles that you faced discourage you while seeking to work in another Member State/region?**

o   Yes, very much

o   Yes, somewhat

o   Neutral

o   No, not really

o   No, not at all

17.   **Did you encounter any other obstacles or issues related to the recognition of professional qualifications?**

o   (Open field)

18. **Do you have suggestions on how to improve the current system?**

    o   (Open field)

19. **What went well in your experience? Anything else you would like to mention regarding your experience?**

    o   (Open field)

Background information

Finally, we have some general questions about your background to better understand your experience with qualification recognition.

20. **In which country did you obtain the professional qualifications you (tried to) get recognised?**

    o   Belgium

    o   France

    o   Germany

    o   Luxembourg

    o   The Netherlands

    o   Other (please specify)

21. **In which country did you (try to) get your professional qualifications recognised?**

    o   Belgium

    o   France

    o   Germany

    o   Luxembourg

    o   The Netherlands

    o   Other (please specify)

22. **Did your documents need to be translated?**

    o   Yes

    o   No

Questions for institutions and organisations

1. Name of the institution/organisation
    o   **(Open field)**
2. Where is your institution/organisation based? (Country/region/city)

- o **(Open field)**
3. Have you received or handled questions from citizens or employers/organisations about the recognition of professional qualifications in the case of (wishing to) work in another Member State or region?
    - o **Yes, frequently**
    - o **Yes, occasionally**
    - o **No**
    - o **Not applicable**
4. If yes, which professions or sectors have these situations or examples been related to? (Please specify the specific profession(s) or sector(s))
    - o **(Open field)**
5. Please indicate the countries or regions involved in these cases or inquiries (both the origin of the training/qualification and the intended destination Member State or region)
    - o **(Open field)**
6. To your knowledge, have citizens encountered any obstacles related to the recognition of professional qualifications?
    - o **Yes**
    - o **No/Not applicable**
7. If yes, please specify the type of obstacles encountered:
    - o **Information Provision:**
      - ☐ Uncertainty about whether the recognition process is mandatory
      - ☐ Difficulty identifying the correct authority to contact
      - ☐ Challenges finding information about the application process
      - ☐ Other obstacles on availability/clarity of information (please specify below)
    - o **Application Process:**
      - ☐ Documents only accepted in certain language: having to translate documents (e.g., diplomas)
      - ☐ Costs associated with the application
      - ☐ Lengthy decision-making process (it takes a long time to get a decision)
      - ☐ Other obstacles on the application process (please specify below)
    - o **Result of the Decision:**
      - ☐ Requirement to complete additional training or tests before recognition is granted
      - ☐ Other obstacles on the result of the decision (please specify below)

    Please indicate the priority level of the obstacles you selected, ranking them from the most to the least urgent to improve.

    - o **Please elaborate on any obstacles identified above:** *(Open text field)*
    - o **Are there any other obstacles not listed above?** *(Open text field)*
    - o **In which country or countries do these obstacles arise? Please specify (if possible) both the country of origin and the intended destination Member State or region.** *(Open text field)*
8. Are you aware of any institutions or employers that face difficulties in recruiting employees across borders or in developing (cross-border) services due to challenges related to the recognition of professional qualifications?
    - o **Yes, (Open field)**
    - o **No**
    - o **Not applicable**
9. Have you encountered any positive experiences or good practices related to the recognition of professional qualifications? Do you have any recommendations for improving the recognition process?
    - o **(Open field)**
10. Is there anything else you would like to add regarding the recognition of professional qualifications?
    - o **(Open field)**

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