

CALL FOR EVIDENCE FOR AN IMPACT ASSESSMENT	
TITLE OF THE INITIATIVE	Skills Portability Initiative
LEAD DG (RESPONSIBLE UNIT)	Directorate-General for Employment, Social Affairs and Inclusion <ul style="list-style-type: none"> unit for vocational education and training, skills portability, CEDEFOP unit for professional qualifications and skills for competitiveness
LIKELY TYPE OF INITIATIVE	The Skills Portability Initiative is a comprehensive package of three interrelated actions. The exact type of initiatives is still to be determined , but the package explores the following three components: <ul style="list-style-type: none"> action 1: a potential legislative proposal to facilitate worker mobility through improved transparency of skills and qualifications, and digitalisation; action 2: potential measures to facilitate, modernise and expand recognition processes for regulated professions; action 3: a potential legislative proposal for common rules to simplify procedures for the recognition of qualifications and skills of third-country nationals.
INDICATIVE TIMETABLE	Q3-2026
ADDITIONAL INFORMATION	Have your say portal

A. Political context, problem definition and subsidiarity check
Political context
<p>This initiative delivers on the Commission's 2024-2029 political guidelines, which call for the strengthening of the EU's prosperity and competitiveness by making the best use of 'all skills irrespective of where and how they were acquired'. It is a key element of the Union of Skills and of the efforts to further facilitate labour mobility under the mandate of the Commission's Executive Vice-President Minzatu. It also aligns with one of the key policy areas of the 2024 Labour and skills shortages action plan, which focuses on 'improving fair intra-EU mobility for workers and learners'. The Initiative builds on the principles of the European Pillar of Social Rights and is consistent with the rationale of the Council Recommendation on a European approach to micro-credentials for lifelong learning and employability. Enrico Letta's 2024 report 'Much More Than a Market' highlighted the importance of this initiative on skills portability. This report noted that the free movement of people remains the least developed of the EU's four freedoms; and called for the creation of a fifth freedom for research and innovation. Similarly, Mario Draghi's 2024 report 'The Future of European Competitiveness' stressed the need to make skills easily understandable across the EU in order to maximise the return on skills investment and improve workers' employability. This initiative also contributes to the European Commission's simplification efforts by reducing administrative burden and costs for both workers and their employers.</p>
Problem the initiative aims to tackle

The Initiative aims to address the core problem of **limited portability of qualifications and skills** in the EU. This is hindering labour mobility, the functioning of the Single Market and the effective addressing of labour and skills shortages. Of the [four freedoms of the EU single market](#), **free movement of workers** is the **least developed**, due in part to barriers related to the portability of qualifications and skills.

First, employers throughout the EU often do not understand or trust **qualifications from other Member States and may therefore be reluctant to accept them**. Over the last two decades, instruments have been put in place to increase the transparency of EU qualifications and skills in the labour market. Examples include the [European Qualifications Framework \(EQF\)](#), the [Europass](#) platform, the [ESCO](#) taxonomy and the [EURES](#) cooperation network. In the context of the EQF, Member States have developed national qualifications frameworks (NQFs) and most have developed [registries for NQFs](#). However, implementation of the EQF is uneven. Some Member States do not have NQF registries in place, and some have not shared data with the Europass platform. This uneven implementation is limiting access to information on qualifications and hindering the transparency and understanding of qualifications and skills across the EU. There has also been limited work on the transparency of qualifications from third countries, such as the comparison of certain NQFs with the EQF.

Second, where the law requires the possession of specific qualifications to access a profession, formal recognition of qualifications is necessary for cross-border mobility. Despite the existing rules under [Directive 2005/36/EC](#) (the Professional Qualifications Directive) that facilitate the cross-border recognition of qualifications for EU citizens in such cases, **recognition processes** can still be lengthy, complicated and costly. There is therefore scope to further facilitate, modernise and expand these processes in order to improve the functioning of the Single Market.

Third, **nationals from third countries** may need formal recognition of their qualifications in order to access a regulated profession, as well as to obtain a residence and/or work permit. There is a common legal framework for cross-border recognition of qualifications in regulated professions in place for EU citizens, but this is not the case for third-country nationals. The recognition of qualifications and validation of skills of third-country nationals is subject to differing national procedures. The [2023 Commission Recommendation on the recognition of qualifications of third-country nationals](#) aimed to facilitate national recognition processes. In practice, however, recognition procedures remain fragmented, complex and inefficient. They therefore create administrative burden for mobile professionals and companies willing to recruit them. This situation undermines the EU's overall competitiveness, for example by limiting the contribution of third-country nationals to the EU's research and innovation potential.

Fourth, people may have **valuable skills that remain hidden**, for example if they are not captured by formal qualifications. Such skills can be acquired informally (e.g. through work experience) or through non-formal training (e.g. an upskilling course at work). EU citizens, third-country nationals and employers may have difficulty showcasing and identifying these skills in the EU labour market. This can lead to the underutilisation of skills, overqualification and skills mismatches, hampering the EU's competitiveness.

Last, but not least, while the 2025 Single Market Strategy prioritises **digitalisation**, the current approach to issuing digital credentials for qualifications and skills remains fragmented. Many Member States still rely on **paper-based** systems, but these pose risks of fraud, inefficiency and poor interoperability across the EU. Some voluntary tools supporting the standardisation of the digital transformation of credentials (including qualifications) exist (e.g. the [European Learning Model \(ELM\)](#)), but Member States are still taking different approaches and this impairs portability. The introduction of the [EU Digital Identity Wallet](#) in 2026 will change the digital landscape, but not all Member States will necessarily offer digital qualifications or adopt the same approach, thus making the portability and understanding of digital qualifications more difficult.

Without intervention by the EU, these barriers to the portability of qualifications and skills, as well as problems and consequences arising from them, will likely persist or even worsen such as in the case of fragmented and incompatible digitalisation processes.

Additional evidence on barriers to the free movement of workers¹ related to qualifications and skills will be gathered through three separate targeted studies, a public consultation and stakeholder input.

Basis for EU action (legal basis and subsidiarity check)

Legal basis

¹ For the purpose of this call for evidence, the term 'workers' also refers to the self-employed.

Depending on the outcome of the planned impact assessments, different policy options under the three actions could be envisaged. Their legal bases would be as follows.

- **action 1: a potential legislative proposal to facilitate worker mobility through improved transparency of skills and qualifications, and digitalisation:** Article 46 TFEU on the freedom of movement for workers; Article 53 on the mutual recognition of professional qualifications for self-employed persons; and Article 114 on harmonisation of national laws to ensure the proper functioning of the Single Market.
- **action 2: potential measures to facilitate, modernise and expand recognition processes for regulated professions:** Articles 46, 53(1) and 62 TFEU on the freedom of movement of workers, services and establishment as well as mutual recognition of professional qualifications in the context of these freedoms; and Article 49a(4) and Article 57c of Directive 2005/36/EC.
- **action 3: a potential legislative proposal for common rules for simplification of procedures for the recognition of qualifications and skills of third-country nationals:** Article 79(2)(a) and (b) TFEU on measures concerning the conditions of entry and residence and the definition of rights of third-country nationals including the conditions governing freedom of movement.

Practical need for EU action

EU action is **necessary** because barriers to the portability of qualifications and skills cannot be addressed by the Member States acting alone. These obstacles to portability hinder Single Market freedoms, in particular the free movement of workers, and reduce the EU's attractiveness for skilled professionals. The interoperability of digital credentials across borders cannot be achieved through Member States' actions without coordination at EU level.

EU action **adds value** by tackling barriers to the portability of qualifications and skills across national borders and by making it easier to attract and retain skilled professionals. Modernising the existing recognition processes for EU citizens supports the better implementation of Single Market freedoms. This would be further enhanced by the establishment of common standards for digital credentials. In combination with the development of common EU rules for the recognition of third-country nationals' qualifications, this would also make the EU more attractive to talent from third countries. This would in turn avoid the development of national solutions that are costly and deepen the fragmentation of the Single Market. The actions proposed under this initiative are more coherent and efficient; generate economies of scale; reduce costs and administrative burdens; and enhance the attractiveness of the EU labour market in ways that cannot be achieved at the national level. The cross-border dimension of these challenges and the need to foster mutual trust between national systems together mean that the EU is well placed to act, in accordance with the competences conferred in the EU Treaties. This will help unlock the full potential of the Single Market and boost the EU's competitiveness and prosperity.

B. Objectives and policy options

Objectives

The Skills Portability Initiative has two overarching aims: to ensure that **qualifications and skills are portable across national borders in the EU; and to make the EU a more attractive place for talent.** The initiative will pursue three specific objectives: (i) increase the transparency and comparability of qualifications and skills, irrespective of how and where they have been acquired; (ii) modernise recognition procedures for EU citizens' access to regulated professions, including through digital tools; and (iii) streamline and simplify the recognition of third-country nationals' qualifications. Accelerated digitalisation by means of EU-wide digital credentials would help to achieve all three specific objectives.

Baseline scenario

Without EU action, barriers to the free movement of workers related to the portability of qualifications and skills will persist. The voluntary nature of existing instruments (e.g. EQF and Europass) prevents them from properly addressing fragmentation in implementation. Digital tools will remain underused, including in recognition procedures. National procedures for the recognition of third-country nationals' qualifications will continue to diverge and remain overly complex. Digitalisation will not proceed at the necessary speed. Digital solutions will not be interoperable. Businesses, in particular SMEs, will struggle to assess foreign qualifications and skills, be they from other Member States or third countries. Skills shortages, overqualification and labour market inefficiencies will worsen, particularly in the light of demographic trends and digitalisation.

Policy options

This is a **non-exhaustive list of possible measures** which, depending on the outcome of the impact assessments, could be combined into different policy options for each of the three actions under the Skills Portability Initiative:

- improving transparency and comparability of skills and qualifications (including micro-credentials) acquired in different Member States by ensuring that Member States have comprehensive and operational NQFs in place that are referenced to the EQF;
- ensuring that up-to-date information on NQF qualifications is available on an EU platform to professionals, employers and authorities, through up-to-date national qualifications registries and including ESCO skills in their descriptions;
- an EU-wide promotion and information campaign that brings NQFs and their benefits (transparency, understanding and easier recognition) closer to employers, education and training institutions, and individuals);
- ensuring that skills documented through micro-credentials issued by accredited education and training institutions are more visible and comparable – by including them in the NQFs and making sure they are formulated in line with the EU approach to micro-credentials;
- making further comparisons of frameworks related to qualifications issued in third countries with the EQF;
- ensuring that all Member States have a system in place for the assessment and validation of skills – including possibilities to obtain micro-credentials through recognition of prior learning and validation of non-formal and informal learning, in line with the EU approach to micro-credentials;
- ensuring that individuals can share their qualifications and skills credentials digitally (e.g. with employers), leveraging the [EU Digital Identity Wallet](#) under the [eIDAS Regulation](#) and relying on this interoperability framework for secure seamless cross-border recognition;
- facilitating the portability of qualifications and skills by ensuring that professionals can obtain interoperable digital credentials for:
 - qualifications included in NQFs;
 - outcomes of recognition processes and [statements of comparability](#) of qualifications;
 - outcomes of skills assessments and documentation by public authorities;
- supporting the implementation of Directive 2005/36/EC by developing digital tools to modernise and simplify procedures for recognition of qualifications to access regulated professions; ;
- extending automatic recognition under Directive 2005/36/EC to additional professions by means of delegated acts;
- establishing EU rules to simplify procedures for recognition of qualifications and understanding of skills of third-country nationals (e.g. clear deadlines, use of electronic procedures and access to information);
- establishing an approved list of qualifications or providers from third countries that meet minimum training requirements for selected priority regulated professions in the EU. Third-country nationals holding these approved qualifications would benefit from automatic recognition;
- exploring options to enhance the capacity of national authorities to process applications effectively (e.g. national coordination of recognition of qualifications of third-country nationals; clear and accessible information provision; interoperability and cooperation between national authorities; and monitoring, evaluation, and development of good practices);
- developing pragmatic solutions to overcome barriers to accessing regulated professions for third-country nationals (e.g. the possibility for applicants to benefit from temporary job opportunities while the recognition process is pending); as well as adaptation periods or aptitude tests when there are substantial differences in access to regulated professions.

Simplification and SMEs

The initiative aims to simplify current recognition, acceptance and recruitment procedures; facilitate interoperable digital workflows; and reduce documentation requirements so as to reduce costs for both authorities and SMEs. SMEs will particularly benefit from easier access to trusted and comparable digital credentials for qualifications and skills, because this will reduce the burden of assessing foreign qualifications. All these actions are intended to have a positive impact, particularly for SMEs that struggle most to find workers with the skills they need.

C. Likely impacts

The initiative is expected to deliver **positive economic impacts** by supporting workers' mobility; reducing labour and skills shortages; facilitating job-matching and reducing skills mismatches; and improving productivity. There will be benefits for SMEs that face difficulties in assessing EU and foreign qualifications. **Social impacts** include better career opportunities for workers, in particular mobile EU citizens and third-country nationals; greater acceptance of skills acquired outside formal education; and reduced overqualification of EU mobile workers and

third-country nationals. **Fundamental rights and equality** are supported by improving equal treatment in the labour market and enhancing mobility rights under Articles 45, 49 and 56 TFEU. **Environmental impacts** are indirect but positive: by easing mobility, the initiative can reduce mismatches and promote a more efficient allocation of skills that are critical to the digital and green transitions. Impacts will vary by territory. Border regions, Member States with high inflows of third-country nationals, and Member States facing acute labour shortages will benefit most. In addition, a coordinated and effective digitalisation effort can generate indirect environmental benefits by reducing paperwork and travelling. Relevant Sustainable Development Goals (SDGs) include SDG 4 (quality education), SDG 8 (decent work and economic growth) and SDG 10 (reduced inequalities).

D. Better regulation instruments

Impact assessment

Three **impact assessments** will be conducted to underpin the preparation of the Skills Portability Initiative, because the proposals are expected to have significant economic, social and regulatory impacts. Three external studies have been launched to support the impact assessments. Action 2 will also draw on the insights gathered in view of the upcoming report on the implementation of Directive 2005/36/EC.

The impact assessments will provide robust data for evidence-based policymaking. They will examine baseline trends; assess legislative and non-legislative policy options; and quantify costs and benefits for workers, employers, SMEs and public authorities. Stakeholder input (public consultation, targeted consultations and hearings with social partners) will be an integral part of the evidence base. The impact assessments will ensure proportionality, digital readiness and consistency with EU fundamental rights and sustainability objectives.

Consultation strategy

The consultation will aim to ensure that the Initiative is evidence-based and reflects stakeholder needs by collecting evidence and views on (i) barriers to portability of qualifications and skills; and (ii) possible policy solutions and their impact.

Planned activities:

- **public consultation** (12 weeks) on the [Have Your Say portal](#), available in all **24 official EU languages**;
- **targeted consultations, including:**
 - dedicated hearings with social partners;
 - expert workshops (e.g. public employment services, advisory committees in the area of skills, quality assurance agencies, recognition bodies, the [ENIC-NARIC network](#) and professional regulators);
 - focus groups with representatives of selected professions;
 - SME feedback through the SME Panel and Enterprise Europe Network;
 - interviews with relevant stakeholders across all 27 Member States and selected third countries; and
 - a survey of issuers of qualifications and learning credentials in Member States in order to assess digitalisation levels;
- **case studies:** to explore specific sectoral and regional impacts;
- **promotion** via Commission channels, stakeholder networks, social media and newsletters.

A **factual summary report** will be published within eight weeks of closure and a **synopsis report** will present the consolidated results of all the consultation activities.

Why we are consulting?

The Commission wants to gather feedback from all affected parties on the challenges related to the portability of qualifications and skills, and on possible policy measures to address them. The consultation will help identify practical obstacles; assess the expected impacts of different options; and ensure that the initiative is evidence-based, proportionate and consistent with the needs of workers, employers and society. The received input will feed into the impact assessments and shape the design of any legislative and non-legislative measures.

Target audience

The consultation is targeting

- the general public;
- public administrations;
- EU education and training advisory bodies and institutions;

- the managing bodies of the NQFs;
- entities that award and issue qualifications;
- entities that are responsible for the recognition of qualifications and validation of skills;
- entities with cross-border expertise in the field;
- accreditation and quality assurance entities;
- public employment services;
- employers and their HR departments;
- social partners;
- chambers of commerce;
- SMEs;
- civil society;
- life-long learning organisations;
- students and youth organisations;
- researchers and research organisations;
- job seekers and mobile workers;
- third-country nationals;
- and stakeholders from strategic sectors (e.g. long-term care, healthcare, transport, farming, ICT and the green industry).