

Inputs for the Skills Portability Initiative



Eurochambres input for the Skills Portability Initiative

Eurochambres welcomes the European Commission's initiative to strengthen portability as a key driver of competitiveness and labour market resilience. Efforts should build on existing tools, improve their implementation and usability, and avoid additional administrative burdens, particularly for SMEs. Skills and qualifications must be transparent and trusted across borders.

At the same time, a balanced approach is essential. Measures should fully respect Member States' competences, maintain high qualification standards and address broader barriers to mobility beyond recognition. Simplifying and digitalising procedures, especially for SMEs, will be key to improving skills matching and attracting talent to the EU.

Context and introduction

Eurochambres supports the ambition to strengthen skills portability across the Single Market, as a key instrument to enhance competitiveness, labour market resilience and economic convergence across diverse national economies. Any new initiatives should build on existing national systems, avoid duplication and minimise administrative burdens, particularly for SMEs. Skills and competences (wherever acquired) should be transparent and easily understood across borders.

Enhancing recognition within the EU and improving the integration of third-country nationals are complementary responses to persistent labour and skills shortages. In this context, the Skills Portability Initiative can contribute to strengthening Europe's competitiveness, while fully respecting Member States' competences in education and training. Its design should take into account the specific needs of smaller and geographically peripheral labour markets, where labour mobility and efficient skills matching are critical, while also avoiding unintended imbalances in labour flows that could deepen regional skills gaps.

At the same time, recognition of qualifications is not the only, nor necessarily the main, barrier to mobility. Language skills, willingness to relocate and access to affordable housing often represent more significant obstacles. A comprehensive approach to portability should therefore address these structural factors alongside recognition frameworks.

Further challenges relate to transparency and trust. Employers may face difficulties in understanding the concrete skills acquired through work experience in another country, and short-course certificates can raise questions when the training provider or quality standards are unclear. The limited issuance of verifiable digital credentials and their uneven interoperability across Member States also restrict the full potential of digital solutions.

Action 1: facilitating worker mobility across the EU through skills transparency and digitalisation

Companies have an interest in ensuring that qualifications obtained in other Member States are transparent and comparable. This is particularly relevant in border regions, where businesses rely on daily or seasonal cross-border mobility of workers. Existing transparency instruments such as the European Qualification Framework (EQF) and National Qualification Frameworks (NQFs) provide an important foundation and should be further strengthened and better connected, including through improved data exchange at EU level. Member States should be supported in improving the transparency of VET qualifications, building on the tools already available in the EQF and the Herring Declaration's call for greater comparability and trust in qualifications.

However, the implementation and practical usability of these tools remain uneven across Member States, with gaps such as incomplete qualification registers and limited data sharing with European platforms. At the same time, their practical usability and visibility for businesses, particularly SMEs, remain limited, with awareness often low, and should be enhanced.

Chambers are well placed to act as intermediaries in raising awareness and supporting SMEs in the practical use of these instruments, and this role should be reinforced through targeted EU support. Eurochambres will further assess the level of awareness and practical effectiveness of existing EU tools among companies. Stronger cooperation between competent authorities, chambers and VET providers, particularly in border regions, could further strengthen transparency and trust in qualifications.

Transparency of qualifications should not be equated with automatic recognition, which remains subject to national rules and requirements.

Digital infrastructure, including verifiable digital credentials and interoperable digital wallets, can contribute to improving transparency and cross-border mobility. Any such tools should be simple, reliable and accessible for SMEs. Priority should be given to ensuring interoperability across Member States, providing a straightforward service for employers to verify credentials, and making qualification standards easily consultable. In this context, initiatives such as the European Digital Identity Wallet (EUDI Wallet) and European Digital Credentials for Learning should be leveraged and aligned with national systems, avoiding the creation of parallel or duplicative tools.

Digital solutions can also help modernise administrative procedures, for example through automated translation of documents, user-friendly portals to submit and track applications, and document-verification tools that reduce delays and administrative burden. Digital-first approaches, including electronic identification, authentication and verification, should be promoted, while ensuring high standards of cybersecurity and personal data protection to build trust among users.

Before introducing additional instruments, greater efforts should focus on improving the implementation, awareness and practical use of existing EU tools. The EU has developed a wide range of transparency instruments; ensuring their consistent and effective application across Member States should remain a priority, rather than creating additional instruments.

Greater attention should also be given to validation systems for non-formal and informal learning, enabling competences acquired through work experience to be properly documented and understood across borders.

Micro-credentials are certainly an option to promote mobility and flexibility, provided that they complement, rather than replace, full qualifications. In addition, micro-credentials must not be limited to procurement by higher education institutions, but must also be open to non-academic VET providers, in line with the Council Recommendation on a European approach to micro-credentials for lifelong learning and employability. Micro-credentials must not replace full qualifications and lead to associated entitlements. Full-fledged vocational training is systematically built up and networked. Micro-credentials must in no way fragment or otherwise jeopardise successful national VET systems. Formal or systematic curricula or training rules must also be completed or proven here.

Finally, facilitating mobility must not compromise qualification standards. Labour shortages are particularly acute in VET-related occupations, where trust and quality are essential. The objective should be to make VET more attractive and mobility smoother, while maintaining high standards and credibility across systems.

Chamber insight:

A key transparency instrument for making competences acquired in other Member States visible is the possibility of recognition, including in the non-regulated sector. However, the number of intra-European recognition procedures in the non-regulated sector in Germany is very low: in 2024, there were a total of 13,500 recognition procedures, of which only 1,400 concerned qualifications from EU/EEA/Switzerland. Of these procedures, 62% received a positive decision in the form of full equivalence, and 36% resulted in partial equivalence.

In Italy, approximately 5,800 recognition decisions for professional qualifications obtained in other EU/EEA/Switzerland were recorded in 2024, of which around 77% resulted in full recognition and about 23% required compensatory measures such as aptitude tests or adaptation period. At the same time, the usability of transparency tools for companies remains a key challenge, as implementation is regionally fragmented and intra-EU mobility often takes place outside formal transparency frameworks.

These figures suggest that, at least in some Member States, recognition in the non-regulated sector does not necessarily constitute a structural bottleneck, although experiences may differ across Member States and sectors. Low numbers of recognition procedures may also reflect limited trust by SMEs in existing transparency tools, with companies often relying on direct assessment of skills rather than formal recognition mechanisms. This points to a broader usability and credibility challenge rather than a pure recognition barrier. Any EU-level response should therefore remain proportionate, flexible and grounded in comprehensive evidence.

Action 2: facilitating, modernising and expanding recognition processes for regulated professions

Regulated professions are essential to safeguard public safety and maintain professional standards. However, differences in national regulatory approaches, combined with the diversity and inconsistency of procedures across Member States, continue to make cross-border access complex and time-consuming, limiting mobility and constraining the availability of qualified professionals in key sectors. In line with EU law, the regulation of access to professions (except for harmonised professions) remains a competence of Member States and should be fully respected. Access requirements should not be seen as barriers, but as necessary safeguards to ensure quality, consumer protection and fair competition. Any further harmonisation should not lead to a lowering of nationally established qualification standards, particularly in professions linked to public safety and consumer protection.

Employers are open to exploring the extension of automatic recognition to additional professions, including through voluntary Common Training Frameworks, provided the approach remains demand-driven and based on genuine alignment of training requirements. Such frameworks should be developed on a voluntary basis, where substantial agreement already exists among Member States, and with the active involvement of professional associations and organisations. They should avoid lowering qualification standards and unnecessary administrative complexity. Automatic recognition should not be granted without sufficient assessment of equivalence, particularly for high-risk activities.

At the same time, recognition procedures need to be modernised. Despite the existing EU framework, implementation remains uneven and processes are often slow and administratively burdensome. Delays are often not inherent to regulated professions themselves, but rather stem from inconsistent enforcement practices, a lack of digital interfaces and ambiguities in the classification of foreign qualifications.

Greater use of interoperable digital tools, secure digital credentials and more streamlined document exchange, including through standardised data formats, digital interfaces, the application of the once-only principle and automated plausibility and document checks, could significantly reduce delays and costs and contribute to faster and more efficient procedures.

Exploring shorter and more predictable decision deadlines for automatic recognition, where appropriate, could further improve efficiency.

Action 3: simplifying the recognition of qualifications and skills of third-country nationals

Eurochambres supports exploring practical ways to improve the recognition and validation of qualifications and skills of third-country nationals, particularly in sectors facing acute labour shortages. Clearer procedural standards, shorter processing times and greater predictability would enhance transparency for businesses and workers.

Unlike EU nationals, third-country nationals do not benefit from a uniform EU-level framework for recognition, leading to significant differences in procedures and requirements across Member States.

Fragmented and lengthy recognition procedures often result in underemployment and skills waste, limiting productivity and weakening the EU's attractiveness in global competition for talent. During prolonged procedures, many third-country nationals accept low-skilled or informal employment, which can lead to persistent mismatches and lost economic potential. This places a disproportionate burden on employers, particularly SMEs, which often lack the resources to assess foreign qualifications, interpret non-standardised documentation and navigate complex administrative procedures.

Employers often face difficulties in assessing qualifications from third countries due to limited access to clear comparative information, standardised documentation and reliable digital certificates.

In addition, access to the EU labour market is often constrained by visa procedures, which can represent a significant barrier for employers seeking to recruit talent from third countries.

Strengthening guidance and information, including through cooperation with EU delegations in key partner countries, could improve understanding of qualifications prior to arrival in the EU. Voluntary common guidance, minimum procedural standards, transparent rules and a shared methodology could support more consistent and efficient recognition practices, while fully respecting Member States' competences in migration and professional regulation. Stronger validation mechanisms for skills acquired outside formal education systems would further support faster labour market entry and better skills utilisation. In some Member States, such as Germany, validation of non- and informal learning already plays an important role in recognising the skills of individuals who are already present in the country, although it is not designed as an entry pathway for labour migration. Further work on systematically comparing qualification frameworks of selected third countries with the EQF could support faster and more informed recognition decisions. Structured partnerships with selected third countries, including the identification of recognised qualifications and training providers meeting minimum requirements, could further facilitate recognition and reduce administrative burdens.

In this context, digital recognition processes, including interoperable digital certificates, digital comparison tools and fully digitalised procedures (from application to decision), should progressively become the standard.

Where appropriate, more flexible solutions could also be considered, such as allowing qualified professionals to access temporary employment opportunities while recognition procedures are ongoing. Compensatory measures, such as adaptation training or work-

based learning opportunities, can further support integration and skills matching.

We would also encourage stronger exchanges among Member States on their approaches to attracting and integrating talent. Several national initiatives already provide promising examples, and greater sharing of good practices could contribute to more effective and better coordinated solutions across the EU.

Chamber insight:

Following several amendments, the German Skilled Immigration Act provides a solid basis for the immigration of qualified workers. Although there is still a need for improvement at national level in certain details (e.g. reducing bureaucracy, creating a clearing office, better support for SMEs), the business community sees no immediate need for additional binding EU legislation, while supporting practical improvements and better coordination.

In Italy, the main obstacles are procedural and administrative rather than regulatory. While EU action can usefully support coordination, guidance and interoperability, the effectiveness of qualification recognition largely depends on national administrative capacity and organisation. In practice, employers, especially SMEs, often rely on practical assessment and workplace training instead of formal recognition, as procedures are document-based and difficult to apply when educational documentation from third countries is incomplete. This highlights the need for faster and more practical validation mechanisms, as well as the possibility of temporary employment during recognition procedures, rather than additional EU binding legislation.



Eurochambres – the association of European chambers of commerce and industry – represents more than 20 million businesses through its members and a network of 1700 regional and local chambers across Europe. Eurochambres is the leading voice for the broad business community at EU level, building on chambers’ strong connections with the grass roots economy and their hands-on support to entrepreneurs. Chambers’ member businesses – over 93% of which are SMEs – employ over 120 million people.

All the inputs can be found [here](#).

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