



European Network of Medical
Competent Authorities

ENMCA response to DG MARKT's call for expression of interest in the introduction of the European Professional Card

November 2013

The European Network of Medical Competent Authorities (ENMCA) brings together organisations in Europe responsible for recognising medical qualifications under the Directive 2005/36/EC. As doctors are one of the most mobile professions in Europe, ENMCA participants have significant experience with both the benefits and challenges of high levels of professional mobility and recognition procedures.

ENMCA was first convened at the behest of the European Commission in spring 2010, to assist with the revision of the Directive by collating the experiences of national medical competent authorities with Directive 2005/36/EC.

In responding to this call for interest, ENMCA participants encourage the Commission to clarify how it intends to capture the views of all competent authorities on the possible introduction of recognition with a European Professional Card (EPC) for the medical profession.

ENMCA would also welcome assurances that competent authorities will be invited to assist the Commission in determining the operation of the card before the relevant implementing act is drafted, should it be decided that recognition with an EPC is to be rolled out for the medical profession.

In responding to the call for interest, ENMCA is commenting on the process taken by the European Commission so far and on the need to involve competent authorities.

ENMCA welcomes the assurances reflected in the political agreement which outline that the following requirements need to be met before the EPC is introduced:

- Recognition with a card needs to benefit both "professionals and competent authorities" (recital 4);
- The introduction of the EPC must "be preceded by an assessment of its suitability for the profession concerned and its impact on Member States" (and therefore competent authorities) (recital 4);
- "Relevant stakeholders" need to express an interest in the card (Article 4a(7)(b)).



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ENMCA position

In light of the above, it is unfortunate that the approach, including the call for expressions of interest, taken by the European Commission has been limited to engagement with organisations representing the professions and has not included competent authorities.

ENMCA has consistently highlighted the importance for competent authorities to be involved in the decision of whether the card is necessary or desirable, as well as any subsequent effort to implement recognition with a card. Competent authorities were successfully involved in the introduction of the IMI system which proved to be a valuable tool. We believe it is essential that competent authorities are also involved from the outset to help shape the development of recognition with a professional card. This in turn will help the subsequent roll out of the alert mechanism.

The involvement of competent authorities will ensure that recognition with a card is operationally and financially viable¹, that it benefits both competent authorities and moving professionals (as prescribed by recital 4 of the new Directive) and that existing patient safeguards are not diluted.

ENMCA therefore calls on the European Commission to clarify how competent authorities can express a view on the introduction of a European professional card for the medical profession. This will help to provide assurances that the opinion of all relevant stakeholders are taken fully into account.

This ENMCA submission has been shared with wider decision makers and relevant professional and regulatory actors.

Further information

Please visit the ENMCA website: <http://www.enmca.eu/>
or to discuss our position in more detail please contact:
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We have also produced a *facts and figures* document with useful information about the mobility and training of doctors. This can be found on our [publications page](#).

¹ Whilst we recognise that the system will be delivered via IMI, the new deadlines and the need to have two simultaneous recognition processes will put burdens on competent authorities that need to be investigated fully.