



The European Council of Optometry and Optics (ECOO) response to the European Commission Public Consultation on the Professional Qualifications Directive

As an organisation of professional associations in more than 30 European countries, the European Council of Optometry and Optics (ECOO) is pleased to provide its comments to the consultation document issued by the European Commission. In terms of qualifications, a broad and varied landscape has traditionally existed in the profession of optometry and optics across Europe. During the past years, the harmonisation of standards and qualifications in optometry and optics has therefore been one of ECOO's main priorities. With the development of the European Diploma of Optometry (EDO) and the ongoing development of a European Qualification in Optics (EQO) ECOO and its member organisations are taking a leading and proactive role in the harmonisation debate so as to facilitate further the free movement and establishment of optometrists and opticians throughout Europe. In this context, ECOO would welcome the opportunity to meet with the European Commission and to participate actively in the development of the proposals outlined.

Please note that we have only answered the questions which are relevant to ECOO.

Question 1: Do you have any suggestions for further improving citizen's access to information on the recognition processes for their professional qualification in another Member State?

- ECOO sees a real need for clearer guidelines and better explanations of the procedure to professionals across Europe covered by the Directive. ECOO receives many questions from its members on a regular basis on this issue. It would be helpful if a centralised website was created with national links to sites where information is laid out in a consistent way throughout all Member States. In order to do so, we believe national authorities should communicate and cooperate more effectively on this issue.

Question 2: Do you have any suggestions for the simplification of the current Recognition procedures? If so, please provide suggestions with supporting evidence.

- Establishing a single point of contact could be a helpful way for interested professionals to approach and then be referred to relevant officials accordingly depending on the nature of their request.

Question 3: Should the Code of Conduct become enforceable? Is there a need to amend the contents of the Code of Conduct? Please specify and provide the reasons for your suggestions.



- Yes, the 'Acceptable Practice' element within the Code of Conduct should become enforceable to ensure that national authorities are not only aware of their obligations but also allow for the same access across all Member States.

Question 4: Do you have any experience of compensation measures? Do you consider that they could have a deterrent effect, for example as regards the three years duration of an adaptation period?

Question 5: Do you support the idea of developing Europe-wide codes of conduct on aptitude tests or adaptation periods?

- Yes, European-wide codes of conduct on aptitude test or adaptations periods could be a helpful tool in promoting harmonisation. A degree of flexibility should remain inherent for cases of particular complexity.

Question 6: Do you see a need to include the case-law on "partial access" into the Directive? Under what conditions could a professional who received "partial access" acquire full access?

- Implementing case-law into the Directive could be helpful way to clarify the existing criteria for partial access. Partial access is a major problem in the area of optometry and optics. A fully qualified French optometrist, for instance, is able to have full access to practice in Spain, yet is only allowed partial access in his own country. Case law could help to promote the acceptance of intermediary professions like optometrists which exist in some countries (eg in Spain) but not in others (France) even when training and education curricula for optometry are already fully developed in that country (i.e. France).

Question 7: Do you consider it important to facilitate mobility for graduates who are not yet fully qualified professionals and who seek access to a remunerated traineeship or supervised practice in another Member State? Do you have any suggestions? Please be specific in your reasons.

- In our sector, a practical training element is core to attaining full qualification as a professional. For this reason we feel that in general the vast majority would continue pursue their practical training in the same Member State that they were educated. Having said this we would still support the option of mobility for graduates that are not yet fully qualified. Indeed, ECOO has developed a European Diploma of Optometry and is developing a European Qualification in Optics which, by laying down clear training and education requirements for opticians and optometrists across Europe, has established a sort of de facto European curriculum (and therefore harmonisation) in this profession. We are also reviewing whether we can provide add on qualifications (although this will not always be necessary) for professionals that seek to move to another Member State. Such a harmonised training and



education umbrella could serve as a useful tool to facilitate mobility for graduates and qualified professionals.

Question 8: How should the home Member State proceed in case the professional wishes to return after a supervised practice in another Member State? Please be specific in your reasons.

- Guidelines should be established on acceptance in the home country of the traineeship, albeit with some scope for quality assurance that the supervised practice meets minimum requirements, for example in our sector as is specified in the European Diploma in Optometry. Again, a common training and education umbrella like the European Diploma of Optometry in the field of optometry and optics could help further such acceptance.

Question 9: To which extent has the requirement of two years of professional experience become a barrier to accessing a profession where mobility across many Member States in Europe is vital? Please be specific in your reasons.

Question 10: How could the concept of "regulated education" be better used in the interest of consumers? If such education is not specifically geared to a given profession could a minimum list of relevant competences attested by a home Member State be a way forward?

Question 11: What are your views about the objectives of a European professional card? Should such a card speed up the recognition process? Should it increase transparency for consumers and employers? Should it enhance confidence and forge closer cooperation between a home and a host Member State?

- A European professional card could be a useful tool not only to speed up the recognition process, but also to promote understanding and acceptance of professions such as optometrist which are regulated in some countries yet not yet in others.

Question 12: Do you agree with the proposed features of the card?

- Yes, we believe it is vitally important that it be open to all interested professionals, even if they come from a Member State where the profession is not regulated and wish to move to a Member State where it is.

Question 13: What information would be essential on the card? How could a timely update of such information be organised?

- Information should be very clear and concise on the card, and include but not exclusively: title and date of qualification; recognised accrediting institution; when the individual registered as a professional; and an indication whether there has been any



known proceedings against him or her in a professional context. Additional information could be saved electronically so as to ensure timely and regular updates.

Question 14: Do you think that the title professional card is appropriate? Would the title professional passport, with its connotation of mobility, be more appropriate?

- The title seems appropriate. Passport could lead to opposition and confusion.

Question 15: What are your views about introducing the concept of a European curriculum – a kind of 28th regime applicable in addition to national requirements? What conditions could be foreseen for its development?

- ECOO fully supports the idea of introducing European curricula and they should be encouraged and facilitated, but not enforced in our view due to the expense involved and the risk of low level take up. We also agree that the European curricula should exist in parallel with and not replace national curricula. In fact, ECOO has pioneered this approach with the development of the European Diploma of Optometry and the close cooperation with the European Academy of Optometry and Optics (EAOO). As it is already operational and accepted across Europe, the Diploma could be an ideal pilot project for a European curriculum to be rolled out as a 28th regime. ECOO would be very interested in becoming involved into a potential future pilot project which could see a European curriculum – like the European Diploma of Optometry – be put forward by a number of Member States for endorsement by the Commission as an implementing measure.

Question 16: To what extent is there a risk of fragmenting markets through excessive numbers of regulated professions? Please give illustrative examples for sectors which get more and more fragmented.

- The risk of fragmentation in the primary eye care sector is not the excessive number of regulated professions but the excessive number of differences in the ways how the professions in the primary eye care sector – optician and optometrist in particular – are regulated respectively in the Member States. We would ask the Commission to exercise caution if seeking to reduce the numbers of regulated professions and to only make changes following a period of engagement with the affected professions.

Question 17: Should lighter regimes for professionals be developed who accompany consumers to another Member State?

Question 18: How could the current declaration regime be simplified, in order to reduce unnecessary burdens? Is it necessary to require a declaration where the essential part of the services is provided online without declaration? Is it necessary to clarify the terms “temporary or occasional” or should the conditions for professionals to seek recognition of qualifications on a permanent basis be simplified?



Question 19: Is there a need for retaining a pro-forma registration system?

Question 20: Should Member States reduce the current scope for prior checks of qualifications and accordingly the scope for derogating from the declaration regime?

Question 21: Does the current minimum training harmonisation offer a real access to the profession, in particular for nurses, midwives and pharmacists?

Question 22: Do you see a need to modernise the minimum training requirements? Should these requirements also include a limited set of competences? If so what kind of competences should be considered?

Question 23: Should a Member State be obliged to be more transparent and to provide more information to the other Member States about future qualifications which benefit from automatic recognition?

Question 24: Should the current scheme for notifying new diplomas be overhauled? Should such notifications be made at a much earlier stage? Please be specific in your reasons.

Question 25: Do you see a need for modernising this regime on automatic recognition, notably the list of activities listed in Annex IV?

Question 26: Do you see a need for shortening the number of years of professional experience necessary to qualify for automatic recognition?

Question 27: Do you see a need for taking more account of continuing professional development at EU level? If yes, how could this need be reflected in the Directive?

Question 28: Would the extension of IMI to the professions outside the scope of the Services Directive create more confidence between Member States? Should the extension of the mandatory use of IMI include a proactive alert mechanism for cases where such a mechanism currently does not apply, notably health professions?

Question 29: In which cases should an alert obligation be triggered?

Question 30: Have you encountered any major problems with the current language regime as foreseen in the Directive?