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COMMISSION STAFF WORKING DOCUMENT

Assessment of stakeholders' experience with the European Professional Card and the Alert Mechanism procedures

TABLE OF CONTENTS

EXECUTIVE SUMMARY

The European Professional Card (EPC) is a way for European professionals to have their professional qualifications recognised in another EU country. It aims to make the recognition of qualifications faster and less burdensome. The system is currently only available for the following five professions: mountain guides, nurses, physiotherapists, nurses responsible for general care and real estate agents.

Although it is called a professional 'card', the system works entirely electronically through a standardised procedure. The software support for this procedure is based on the Internal Market Information system (IMI), an IT application used to connect public authorities across the EU. The EPC was created under the revised Professional Qualifications Directive and is available as of January 2016.

To ensure that EU patients and consumers are adequately protected, and to further strengthen safe professional mobility, an alert mechanism was also introduced in parallel with the EPC. EU countries are required to use this mechanism to quickly warn each other through IMI about rogue professionals.

In contacts with Member States and stakeholders, the Commission has always insisted on the importance of closely monitoring and evaluating how the competent authorities have implemented the EPC and the alert mechanism. The Commission has also insisted on the importance of monitoring and evaluating how the EPC has been used by the professionals the EPC was intended to help.

This staff working document is an important step in this continuous evaluation and monitoring by the Commission. It builds on the feedback the Commission received in several expert meetings, a conference, a workshop, bilateral exchanges with Member States authorities, as well as frequent contacts with professionals and professional organisations, and a public survey.

Stakeholder feedback and the usage statistics from January 2016 to November 2017 confirmed that both initiatives (the EPC and the alert mechanism) responded well to the policy needs, enhance further safe professional mobility, provide added value compared to the 'traditional' processes and facilitate information exchanges. The evaluation demonstrates a high interest of the users in the EPC and an increasing use of the alert mechanism by Member States. The public authorities have appreciated both EPC and the alert mechanism as secure tools for information exchanges and as a useful facilitation. Maintaining a continuous dialogue with the users, providing more legal and technical support and guidance, and ensuring transparency, would all be necessary to ensure successful operation of these novel tools.

Statistical analysis and stakeholder feedback also confirmed that the IMI system is the right platform for these initiatives. The IMI is both secure and effective, and it is flexible enough to be developed further to meet user needs. The evaluation underlines the importance of continuous fine-tuning of the platform's functionalities.

I. CONTEXT

1. General description of the EPC and the alert mechanism procedures

The European Professional Card (EPC) is an electronic procedure professionals can use to get their professional qualifications recognised in another EU country under Directive 2005/36/EC on the recognition of professional qualifications ('the Directive'), as amended by Directive 2013/55/EU. This procedure is supported by the Internal Market Information System (IMI)[1], an IT network used to connect public authorities across the EU, and aims at making the recognition of qualifications faster and less burdensome.

The European Professional Card (EPC) is currently available for general care nurses, physiotherapists, pharmacists, real estate agents and mountain guides.[2]

Although it is called a professional 'card', EPC is an electronic certificate, issued through an entirely online procedure for the recognition of qualifications through IMI. The EPC is more transparent than the traditional paper based processes, mainly because professionals can get informed and start their application through the 'Your Europe' web portal[3]. They can track their application on-line and re-use already uploaded documents to start new applications for different countries. Professionals can apply for an EPC for the purposes of permanent establishment in another Member State or for temporary and occasional service provision there.

The recognition procedure under the EPC also builds on the strong cooperation between national competent authorities in the professionals' home and host countries. A professional seeking the EPC submits online application that is directed through the Internal Market Information System (IMI)[4] to the home Member State, which is the country where one is established or where the professional obtained the relevant professional qualification. Once the file is handled by the home country, it will be forwarded electronically to the host Member State, i.e. the country in which the professional wished to exercise a profession, which issues the EPC. For professionals who only wish to work temporarily and occasionally in the host Member State that does not carry out the check of qualifications, it is the home Member State itself that issues the EPC.

The EPC process is built on the cooperation of competent authorities of at least two Member State competent authorities as described below.

[1] http://ec.europa.eu/internal_market/imi-net/index_en.htm
[2] More information on the selection of professions for the first wave of EPC can be found in the Commission staff working document (SWD(2015)123 final Brussels, 24.6.2015) accompanying the Commission Implementing Regulation (EU) 2015/983 of 24 June 2015 on the procedure for issuance of the European Professional Card and the application of the alert mechanism pursuant to Directive 2005/36/EC of the European Parliament and of the Council.
[3] http://europa.eu/youreurope/epc
[4] http://ec.europa.eu/internal_market/imi-net/index_en.htm

- The home competent authority is the designated authority of the Member State where the professional is legally established at the moment of his/her EPC application. If the professional is not established in any Member State at that time, then the home competent authority is a designated authority of the Member State where the professional was qualified. The main task of the home competent authority is to ensure that the EPC application is complete and that all required supporting documents were checked (validated and authenticated). In a limited number of cases (where a professional seeks to provide services on a temporary and occasional basis and the host country authorities do not carry out prior check of qualifications) the home competent authority also issues the EPC.
- The host competent authority is the designated authority of the Member State of destination in which the professional wishes to work. Most of the time (when a professional seeks permanent establishment in a host country, or seeks to provide temporary and occasional services and the host country carries out prior check of qualifications), it is the host country competent authority that decides on the issuance of an EPC. Where the host country authority fails to take a decision within prescribed deadlines, the EPC is issued automatically (by tacit approval). The EPC, including automatically issued EPCs, has the same value and effects as any other recognition decision.

In certain cases, there are also other national authorities involved in the process. This may, for instance, be the case where applicant's documents originate from other Member States.

To ensure that EU patients and consumers are adequately protected, the Directive also introduced the alert mechanism. Each Member State accordingly is required to quickly warn all other Member States through IMI about the professionals who:

- work in the sectors of health and education of minors and who have been prohibited or restricted from practicing the profession in their country;
- have used falsified diplomas when applying for the recognition of their professional qualifications.

The relevant provisions of the Directive on both initiatives are complemented by the Commission Implementing Regulation (EU) 2015/983 of 24 June 2015 on the procedure for the issuance of the European Professional Card and the application of the alert mechanism pursuant to Directive 2005/36/EC of the European Parliament and of the Council.

Both procedures have been available to applicants since 18 January 2016. This was the deadline of Member States to transpose the revised Directive into their national legislation.

2. Setting up and evaluating the EPC and the alert mechanism

Both the EPC and the alert mechanism are new tools. They required both the professionals and the national competent authorities to adapt to a new IT environment. To facilitate the

launch of the initiatives, the Commission worked very closely with the relevant stakeholders from the early stages of the process.

It was equally important to closely monitor and evaluate the use of these two policy tools after their launch on 18 January 2016. The evaluation and the monitoring of these initiatives has been continuous. It has involved monitoring the use of the relevant IMI modules, constant dialogues with stakeholders and in meetings of the group of coordinators for the recognition of professional qualifications[5] concerning the implementation of the two initiatives.

After the tools were launched, a number of activities took place to promote and evaluate them. The following list shows some of the highlights:

- ***Information video launched on YouTube[6], online information sites***

  The Commission produced an informative video explaining the concept of the EPC for professionals. This video is available with subtitles in all EU languages, and the English version alone had more than 14.000 views by February 2018.

  This video is also accessible via DG GROW's dedicated EPC website[7].

  Moreover, the Commission is constantly working to improve and keep updated the EPC application portal on the Your Europe's website[8].

- ***Launch conference in Brussels***[9]

  The Commission organised a launch conference, both on the EPC and the alert mechanism, on 18 March 2016 involving representatives from public authorities and professional organisations. The conference was attended by 220 participants and was a very successful awareness raising event.

- ***Nomination and shortlisting of the EPC for the European Ombudsman Good Administration award***[10]

  The EPC procedure was nominated and shortlisted for the Good Administration award established by the European Ombudsman. The EPC was shortlisted in the 'Excellence in innovation' category. The nominated Commission's team was acknowledged for its close cooperation with national authorities and professional organisations, which ensured the smooth and timely implementation of the EPC.

- ***Survey on stakeholders' experience with the EPC and alert mechanism***

  The Commission carried out an online public survey between 17 March and 3 May 2017[11]. The survey aimed to gather feedback from relevant national public authorities and

[5] http://ec.europa.eu/transparency/regexpert/index.cfm?do=groupDetail.groupDetail&groupID=2061
[6] https://www.youtube.com/watch?v=N3if_6ZHsMM
[7] http://ec.europa.eu/growth/single-market/services/free-movement-professionals/european-professional-card_en
[8] http://europa.eu/youreurope/epc
[9] https://europa.eu/newsroom/events/conference-european-professional-card_en
[10] https://www.ombudsman.europa.eu/en/activities/eventdocument.faces/en/77458/html.bookmark
[11] https://ec.europa.eu/growth/content/take-part-our-survey-first-year-european-professional-card-0_en

professional organisations on the EPC and the alert mechanism 1 year after their launch on 18 January 2016. More information on this survey and the analysis of the responses can be found in later points and chapters of this staff working document.

- ***Workshop on the first year of operation of the EPC and alert mechanism***[12]

On 16 May 2017 the Commission organised a stakeholder workshop reflecting on the experiences of the first year of operation of the two initiatives.

This workshop was well attended, with around 140 participants, and was also livestreamed in English, French and in German enabling interested stakeholders to follow it online.

- ***Single Market Forum (SIMFO) closing conference***[13]

On 19 June 2017 the Maltese Presidency, the European Parliament and the Commission organised the SIMFO closing conference. This included a workshop on safe professional mobility.

When assessing stakeholders' experiences on the EPC and the alert mechanism, we took into account the input received via different sources, notably but not exclusively on the basis of:

- statistics on the usage of the EPC and the alert mechanism IMI modules;
- responses received to the survey launched in March 2017;
- stakeholders' reactions received during the above-listed events, through bilateral contacts and during the meetings of the group of coordinators;
- the assessment of the national implementing measures concerning Directive 2013/55/EU.

[12] https://europa.eu/newsroom/events/workshop-first-year-european-professional-card-and-%E2%80%98alert-mechanism%E2%80%99_en
[13] https://www.eu2017.mt/en/Events/Pages/Single-Market-Forum-SIMFO.aspx

II. STATISTICS

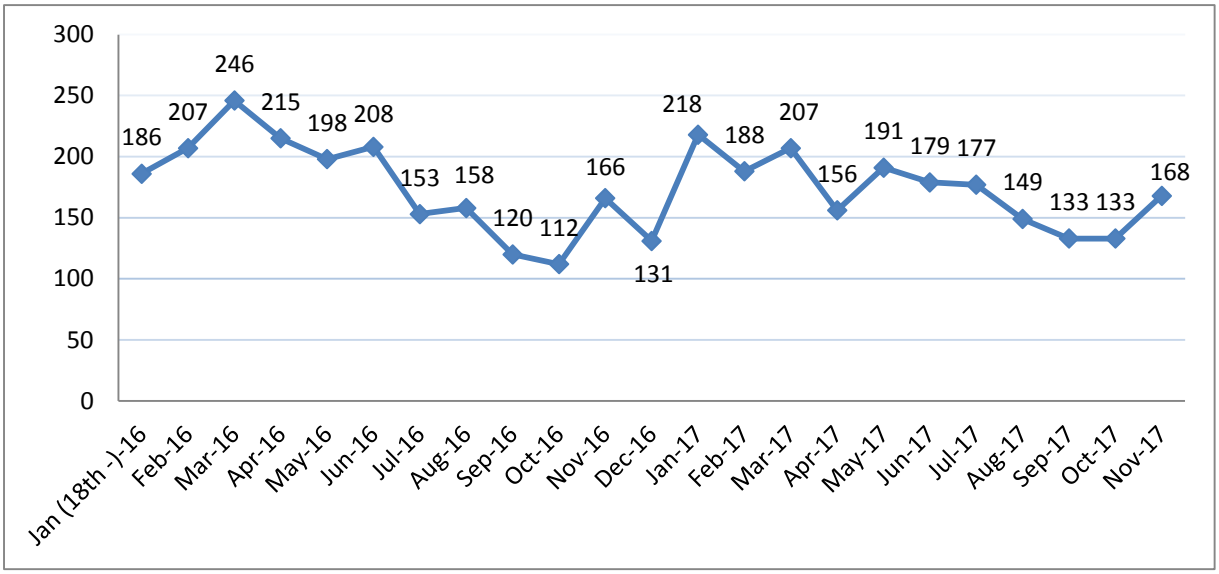
In this chapter we analyse the statistics on the usage of the EPC and alert mechanism modules in IMI from 18 January 2016 to 30 November 2017.

1. Statistics on the EPC procedures – number of applications

A total of 3 997 EPC applications were submitted during the analysed period. This number shows a high interest of professionals who started submitting EPC applications already in the first months after its launch.

The number of submitted applications was relatively evenly distributed during the first year, with an average of 178 applications per month[14]. This trend continued in 2017 with an average of 172 applications per month. In August 2017 the average number of applications decreased about 15% (on average 145 applications were recorded per month). However, the decline appears to be a temporary feature of the late summer period. It also occurred in the first year and the decrease was less significant in the second year.

Diagram 1: Submitted EPC applications per month



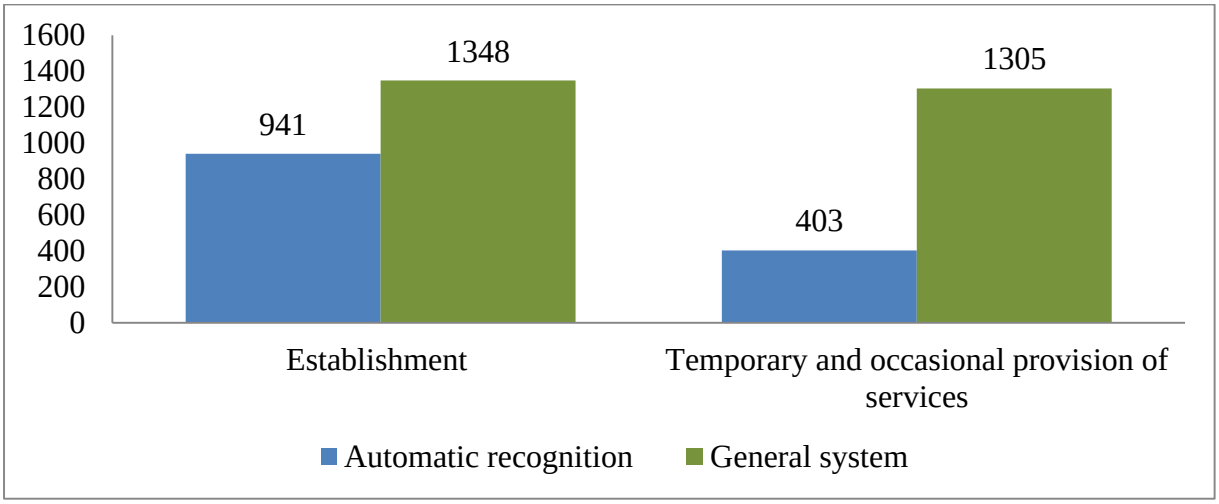
Source: IMI

Statistics also showed that 57% applications were submitted with the purpose of permanently establishing in another Member State, while 43% of the applications were submitted in order to provide services on a temporary and occasional basis.

Concerning the applications of general care nurses and pharmacists, the two professions with harmonised minimum training requirements across the EU, 941 establishment and 403 temporary service provision applications were submitted under the automatic recognition regime. For the other EPC professions the automatic recognition regime is not available.

[14] Average calculated on applications submitted from 1st February 2016 until 28th February 2017.

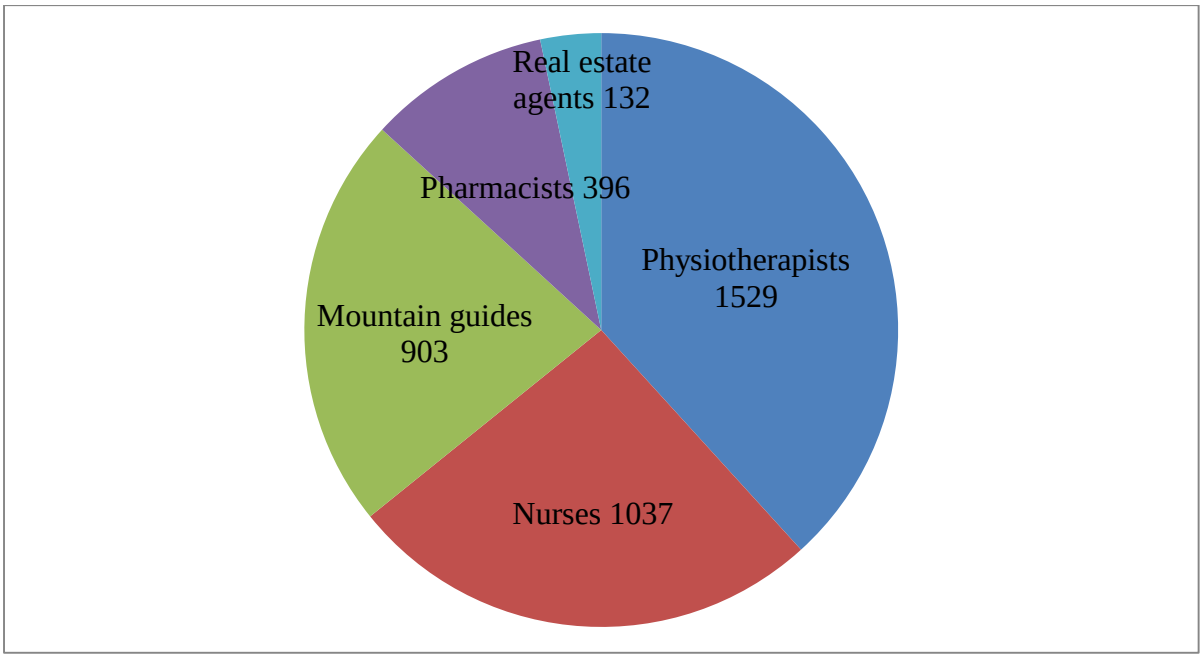
Diagram 2: Submitted EPC applications per purpose and per recognition regime (all professions): January 2016 – November 2017



Source: IMI

The EPC statistics show that physiotherapists were the most active in the period. They represent 38 % of all applications with 1 529 applications. Physiotherapists were followed by nurses responsible for general care with a share of 26 % (1 037 applications) of the total applications. They were followed by mountain guides (23 % of the total applications, 903 applications), pharmacists (10 % of the total applications, 396 applications), and real estate agents (3 % of the total applications, 132 applications).

Diagram 3: Submitted EPC applications per profession: January 2016 – November 2017



Source: IMI

2. Statistics on the EPC procedures – issued EPC certificates

While 3 997 applications were submitted in the analysed period, in the same period a total of 1 758 EPC certificates were issued by the national competent authorities. This number corresponds to 44 % of the submitted applications.

This does not mean that the other applications were rejected or refused. Only 11 % of the submitted applications were rejected or refused within the analysed period. Meanwhile 32 % of the submitted applications were either withdrawn by the professional or closed by the system when the professional did not pursue the application and did not react to the authorities' queries about missing documentation or fees.

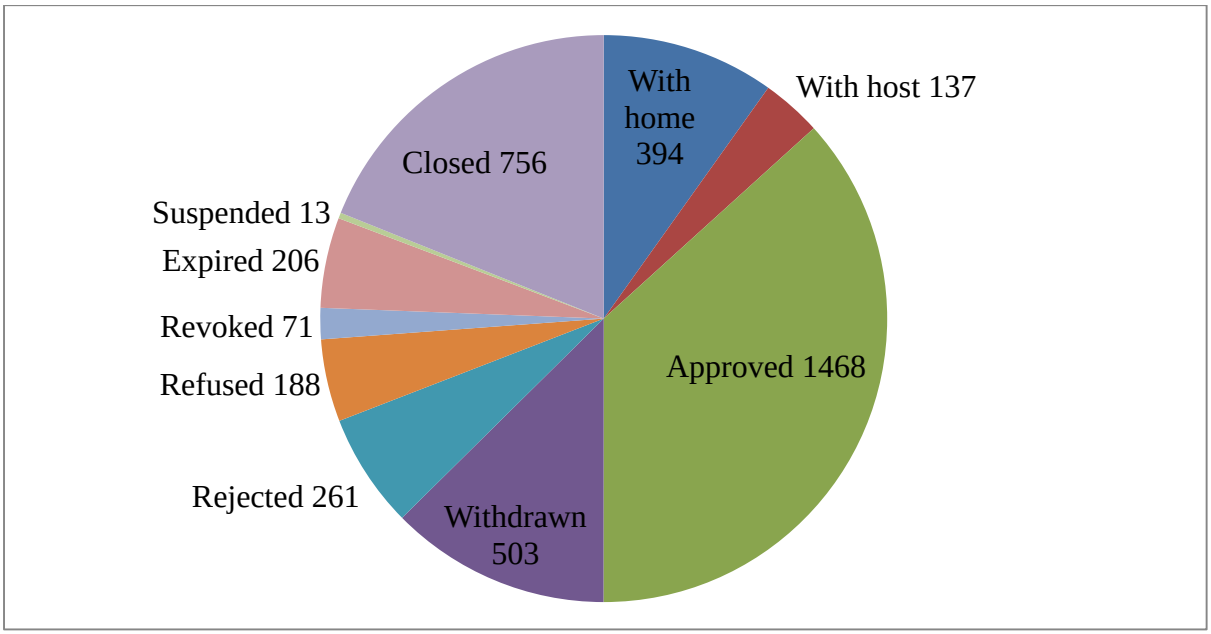
Moreover, given the ongoing procedural deadlines, a considerable number of applications (13 % of the applications) were pending and under assessment by the home or host Member State at the time of the analysed period. These applications also cover the scenario where professionals submitted incomplete applications and the home competent authorities asked for missing information or documents.

The number of issued EPCs also includes cases where the EPC was issued automatically[15], due to the lack of decision by the host competent authority within the applicable deadlines. Article 4d(5) of the Directive states that if a host Member State does not issue the EPC within a specified timeframe the EPC will be sent automatically to the holder of a professional qualification.

Analysing the EPC procedure in detail, thanks to the enhanced transparency provided by the IMI system, helped the Commission in continuously improving the EPC platform. On the basis of the feedback on incomplete applications, the EPC submission platform was further improved and currently a simulator is available for professionals. It enables them to check the concrete fees and document requirements before submitting applications.

[15] On the basis of Article 4d (5) of the Directive.

Diagram 4: EPC applications per status: December 2017

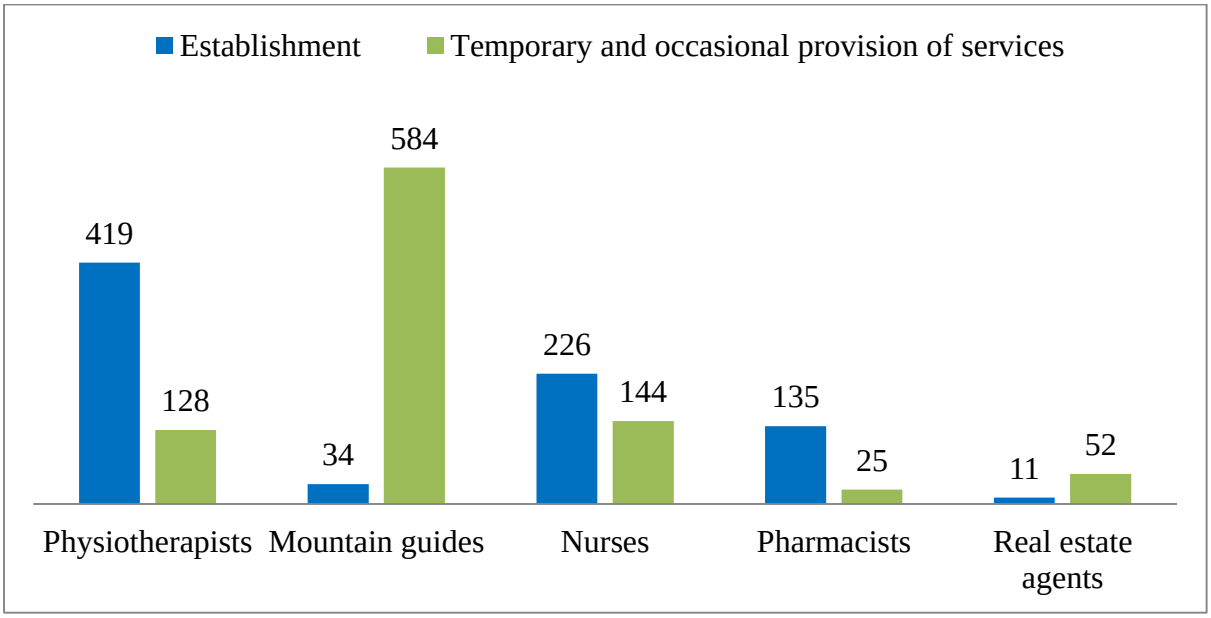


Source: IMI – Snapshot of 1 December 2017[16]

As regards the issued EPCs it is interesting to observe that within most professions the majority of EPCs were issued for the establishment scenario. For mountain guides, and to a lesser extent for real estate agents, more EPCs were issued for the purpose of temporary and occasional service provision. The tendency for mountain guides may be explained by the fact that the profession of mountain guides is particularly mobile. Mountain guides established in one Member State would use the EPC to provide services in other Member States from their home base.

[16]The statuses on the Diagram 4 refer to the following:
Approved: approved applications for which an EPC has been issued and the card is still valid.
Withdrawn: applications submitted and withdrawn by applicant.
Rejected: applications rejected as not eligible for processing.
Refused: applications that resulted in a negative decision by the competent authority.
Revoked: applications for which an EPC was issued and subsequently revoked.
Expired: EPC had limited validity and expired (relevant for temporary provision of services).
Suspended: EPCs that are temporarily put on hold.
Closed: EPC applications that were closed after 3 months pending receipt of missing documents.
With home Member State: submitted EPC applications that are being handled by the home competent authority.
With host Member State: submitted EPC applications that are being handled by the host competent authority.

Diagram 5: Number of issued EPC certificates per profession: January 2016 – November 2017



Source: IMI.

3. Statistics on the EPC procedures – details on individual professions

3.1. Mountain guides

The following 10 Member States notified mountain guides as being a regulated profession: Austria[17], Czech Republic, Germany[18], France, Italy, Poland, Romania, Sweden, Slovenia and Slovakia)[19]. Five of these Member States (Austria[20], Germany, France, Italy and Poland), at least in some regions, consider mountain guides having public health or safety implications and thus apply prior check of professional qualifications in accordance with Article 7(4) of the Directive before the first provision of services on their territory.

Diagram 6: Submitted EPC applications from mountain guides on the basis of their home Member States

Home Member State	EPC applications
Austria	247
Germany	228
Italy	128

[17] The profession is regulated in the following seven Austrian regions: Tyrol, Lower Austria, Styria/Steiermark, Vorarlberg, Upper Austria, Carinthia and Salzburg. Source: IMI EPC repository.
[18] The profession is regulated in the following region: Bavaria. Source: IMI EPC repository.
[19] Greece, the Netherlands and Bulgaria have not yet notified to the Commission whether they regulate the profession or not. Source: IMI EPC repository.
[20] The following Austrian regions apply Article 7(4): Vorarlberg, Styria/Steiermark and Carinthia. The region of Salzburg has not notified the Commission of its requirements for temporary and occasional provision of services under the general system. Source: IMI EPC repository.

Spain	62
Czech Republic	41
Poland	41
Others	156
Total (all Member States)	**903**

Source: IMI

Naturally, the movement of mountain guides is most frequent among the Alpine countries, both in terms of the home and the host Member States.

Diagram 7: Mountain guides - Issued EPCs on the basis of the most selected host Member States

Host Member State	**Issued EPC certificates**
France	281
Italy	195
Austria	93
Slovakia	26
Others	23
Total (all Member States)	**618**

Source: IMI

3.2. Physiotherapists

The following 25 Member States regulate the profession of physiotherapists[21]: Austria, Belgium, Cyprus, Czech Republic, Germany, Denmark, Spain, Finland, France, Greece, Croatia, Hungary, Ireland, Italy, Lithuania, Luxembourg, Latvia, Malta, the Netherlands, Poland, Portugal, Sweden, Slovenia, Slovakia and the United Kingdom[22].

All Member States except Croatia and the United Kingdom conduct prior checks of professional qualifications, according to Article 7(4) of the Directive, before permitting the first provision of temporary and occasional services[23].

Diagram 8: Submitted EPC applications from physiotherapists on the basis of their home Member States

Home Member State	**EPC applications**
Spain	348
Italy	279
Poland	146
United Kingdom	138
Germany	85

[21] According to the notification by the Member States.
[22] Bulgaria has not yet notified the Commission whether they regulate the profession or not. Source: IMI EPC repository.
[23] Slovenia has not yet notified the Commission of their requirements for temporary and occasional provision of services under the general system. Source: IMI EPC repository.

Others	533
Total (all Member States)	**1 529**

Source: IMI

Diagram 9: Physiotherapists - Issued EPCs on the basis of the most selected host Member States

Host Member State	Issued EPC certificates
United Kingdom	271
France	95
Spain	45
Ireland	33
Germany	22
Others	81
Total (all Member States)	**547**

Source: IMI

3.3. Nurses responsible for general care

Nurses responsible for general care are among the 'sectoral professions' for which the Directive provides for harmonised training requirements. This profession is regulated in all Member States and is covered by an automatic recognition mechanism, if the individual professional meets the relevant conditions. Nursing assistants or specialist nurses are not eligible at this stage for an EPC.

As notified by Member States in the IMI EPC repository, all Member States (except Germany and Poland) conduct prior checks of professional qualifications according to Article 7(4) of the Directive before permitting the first provision of temporary and occasional services in the specific cases that fall under the general system[24].

Diagram 10: Submitted EPC applications from nurses responsible for general care on the basis of their home Member States

Home Member State	EPC applications
Italy	197
Romania	94
Spain	93
Finland	92
Lithuania	80
Others	481
Total (all Member States)	**1 037**

Source: IMI

[24] Belgium, Bulgaria, Croatia, Latvia and the Netherlands have not notified the Commission of their requirements for temporary and occasional provision of services under the general system. Source: IMI EPC repository.

Diagram 11: Nurses responsible for general care - issued EPCs on the basis of the most selected host Member States

Host Member State	Issued EPC certificates
Sweden	106
Ireland	60
United Kingdom	46
Spain	41
France	26
Others	91
Total (all Member States)	**370**

Source: IMI

3.4. Pharmacists

Like nurses responsible for general care, pharmacists are among the 'sectoral professions' for which the Directive provides for harmonised training requirements. This profession is regulated in all Member States and is covered by an automatic recognition mechanism, if the individual professional meets the relevant conditions. Specialist pharmacists are not eligible for an EPC at this stage.

Almost all Member States (except Germany, the Netherlands and Romania) apply prior checks of professional qualifications in accordance with Article 7(4) of the Directive before the permitting the first provision of temporary and occasional services in the specific cases that fall under the general system[25].

Diagram 12: Submitted EPC applications from pharmacists on the basis of their home Member States

Home Member State	EPC applications
Italy	135
Poland	77
Spain	38
Romania	34
Greece	12
France	12
Others	88
Total (all Member States)	**396**

Source: IMI

[25] Austria, Belgium, Bulgaria, Croatia and Latvia have not yet notified the Commission of the requirements for temporary and occasional provision of services under the general system. Source: IMI EPC repository.

Diagram 13: Pharmacists - issued EPCs on the basis of the most selected host Member States

Host Member State	Issued EPC certificates
United Kingdom	30
Spain	27
Germany	25
France	20
Ireland	15
Sweden	15
Others	28
Total (all Member States)	**160**

Source: IMI

3.5. Real estate agents

12 Member States notified the Commission that they regulate the profession of real estate agent. Those 12 Member States are Austria, Belgium, Cyprus, Denmark, France, Croatia, Hungary, Ireland, Italy, Luxembourg, Sweden and Slovenia[26]. Since the profession does not have implications on public health or safety, no Member State conducts prior check of professional qualifications in accordance with Article 7(4)[27] of the Directive before permitting the first provision of temporary and occasional services.

Diagram 14: Submitted EPC applications from real estate agents on the basis of their home Member States

Home Member State	EPC applications
Italy	29
France	23
Germany	21
Luxembourg	19
Spain	10
Others	30
Total (all Member States)	**132**

Source: IMI

Diagram 15: Real estate agents - issued EPCs on the basis of the most selected host Member States

Host Member State	Issued EPC certificates
France	25
Italy	15
Belgium	10

[26] Bulgaria, Greece, the Netherlands and Slovakia have not yet notified the Commission as to whether they regulate the profession or not. Source: IMI EPC repository.

[27] Austria and Denmark have not notified the Commission of their requirements for temporary and occasional provision of services under the general system. Source: IMI EPC repository.

Austria	5
Croatia	1
Total (all Member States)	**38**

Source: IMI

4. Statistics on the alert mechanism

Under the alert mechanism, national authorities are required to send quick warnings (alerts) to all other Member States in the following two main scenarios:

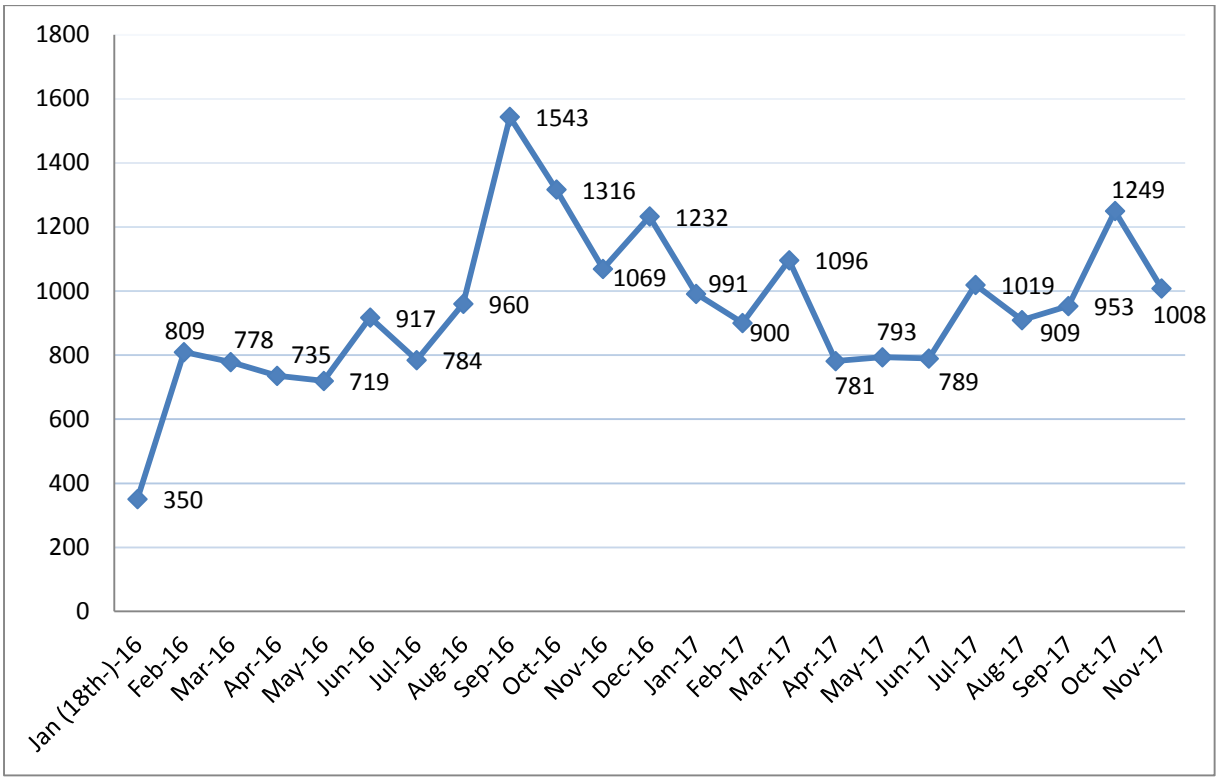
- concerning professionals who have been prohibited or restricted from practicing the profession in their Member State and who are working in the health and education of minors sectors;
- concerning professionals who have used falsified evidence of formal qualifications in support of their application for the recognition of their qualification (regardless of the sector in which they work).

A total number of 13 597 alerts were sent by the Member State authorities since the introduction of the alert mechanism on 18 January 2016.

A steady number of alerts were sent in the first months after the launch of the mechanism, which was followed by a significant increase during the last quarter of 2016. The number of sent alerts has thereafter decreased in the beginning until mid – 2017, and then showed a steady increase towards end of the year. An average of 974 alerts per month has been sent in 2016, while in 2017, until end November the average number of alerts per month was 2 % lower (953)[28].

[28] Average based on number of alerts sent from 18th January 2016 – 31st December 2016 (11.5 months) and 1st January 2017 – 30th November 2017 (11 months).

Diagram 16: Alerts sent per month by all Member States: January 2016 – November 2017



Source: IMI

The vast majority of the alerts which were sent during the examined period were for cases where a professional was restricted or prohibited from practice. Only five alerts were for the use of falsified diplomas.

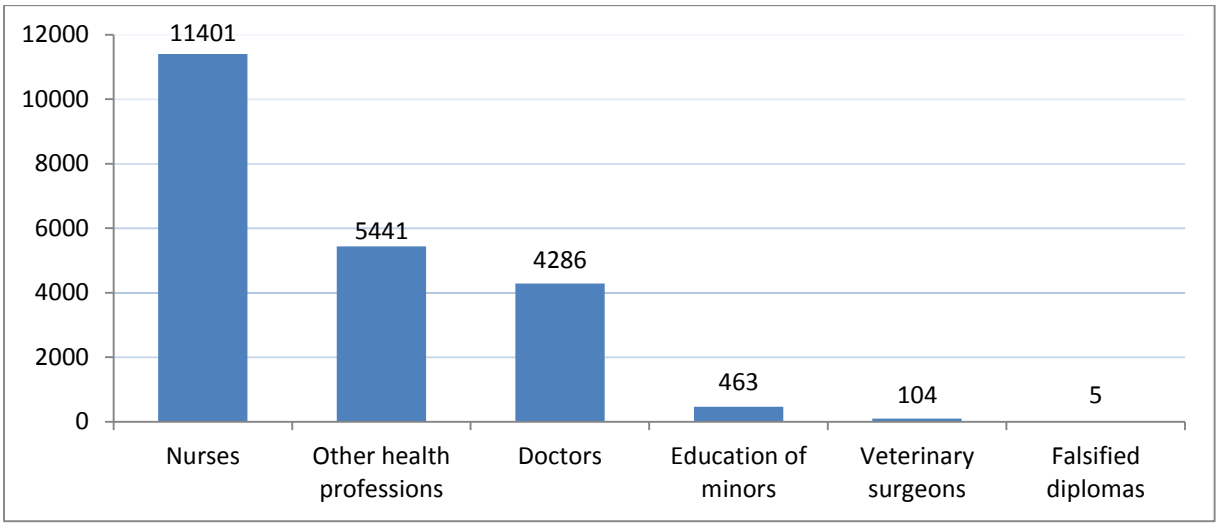
In order to facilitate the distribution and reception of alerts by the relevant national authorities the alerts are sent through different modules in the IMI system according to the profession or category of the alerts concerned. Designing the IMI alert workflow in this way helped the Member States to decide on the access rights for the different modules and also ensured that these were granted strictly on a "need to know" basis.

These modules are as follows:

- as regards the restriction/prohibition cases the following 5 modules were implemented: doctors; nurses; other health professions; veterinary surgeons; education of minors;
- a separate module was implemented for alerts on the use of falsified diplomas.

The following diagram shows the distribution of alerts among the various modules.

Diagram 17: Alerts sent under the specific modules by all Member States

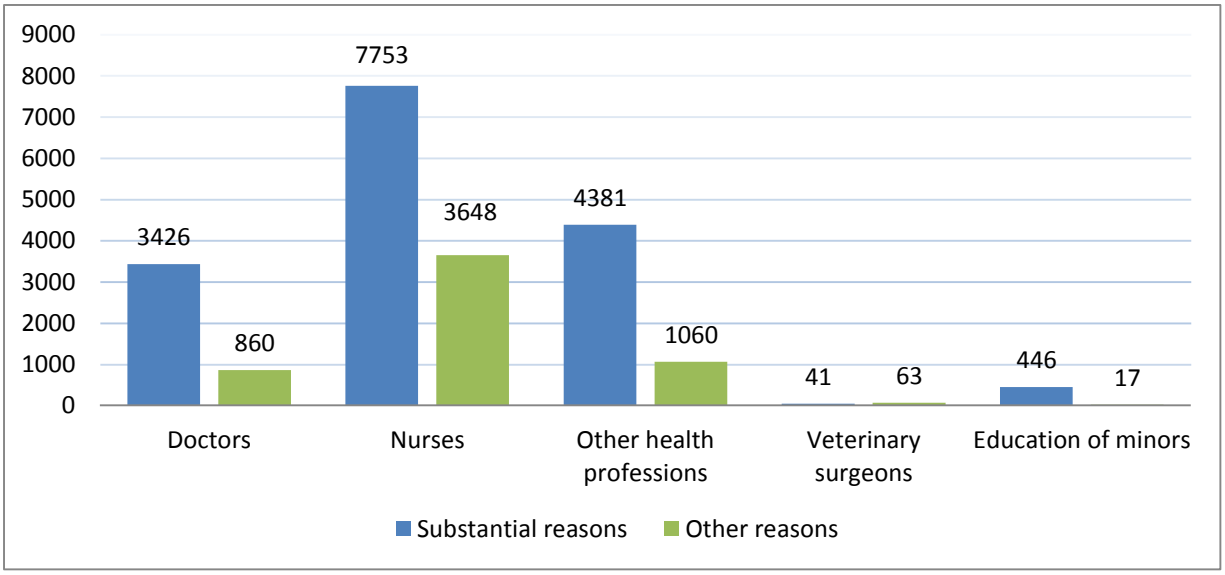


Source: IMI

On the basis of our continuous cooperation with the relevant stakeholders, the IMI enables national authorities to classify an alert (concerning the restriction or prohibition of a professional) being sent on the basis of either 'substantial reasons concerning the practice of the professional'; or on the basis of 'other reasons' (such as non-payment of membership fees, in countries with compulsory membership requirements).

Between January 2016 and November 2017 around 74 % (16 047 alerts) of alerts were sent on the basis of substantial reasons and only 26 % were on the basis of other reasons (5 648 alerts).

Diagram 18: Alerts sent concerning the restriction/prohibition of a professional: alerts by module and reasons

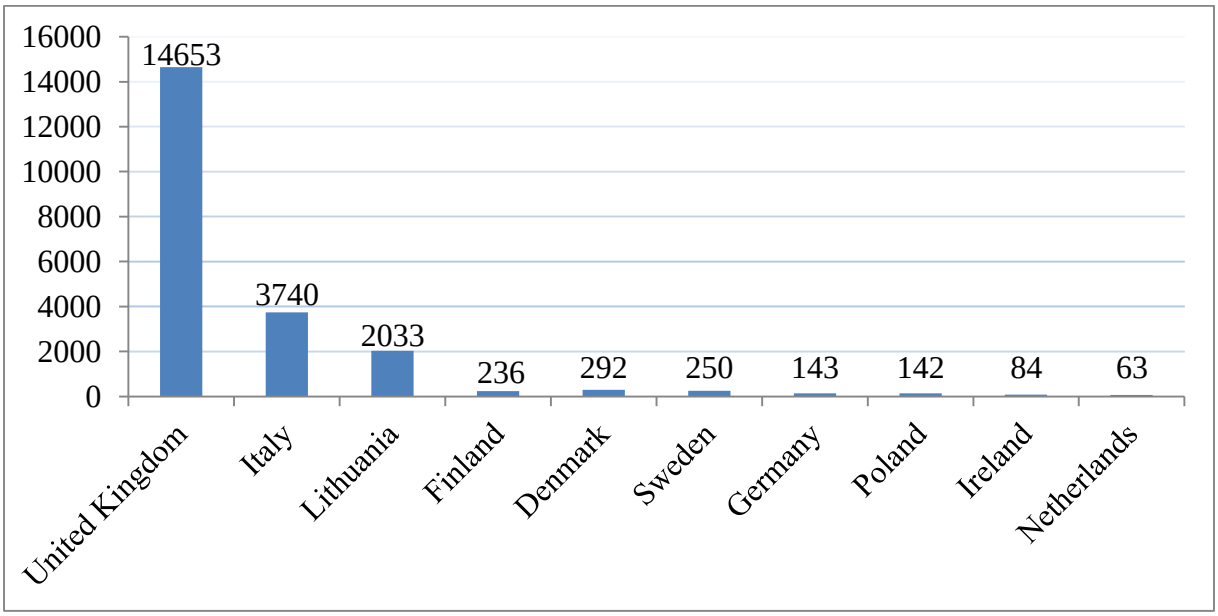


Source: IMI

It is important to highlight that neither the alert mechanism, nor the Directive harmonise in any way the national sanctions that caused the alerts. It is a fact that national disciplinary, professional, criminal systems differ greatly among Member States. In order to build more understanding on the national sanctions that are behind the alerts sent by national authorities, we initiated a dialogue on this issue in the group of coordinators. This dialogue will continue.

On geographical coverage, a significant majority (67.5 %) of the alerts were sent by the UK competent authorities, followed by Italian and Lithuanian authorities. However, it is to be noted that 10 Member States have not yet sent any alerts. This may be due to a certain implementation gap. Contacts with all Member States to ensure take-up and application of the alert mechanism are continuing.

Diagram 19: Number of alerts sent by Member States



Source: IMI

III. SURVEY ON STAKEHOLDERS' EXPERIENCE WITH THE EPC AND THE ALERT MECHANISM - ANALYSIS OF RESULTS

1. Context

The Commission carried out an online public survey between 17 March and 3 May 2017. The survey aimed to gather feedback from relevant national public authorities and professional organisations on both the EPC and alert mechanism initiatives 1 year after their launch on 18 January 2016.

This questionnaire was divided into separate sections. Depending on their interest and experience, respondents could choose to reply to one or several sections of this questionnaire. The sections are listed below.

- Section A was to be completed by all respondents (it requested information on the respondent).
- Section B was aimed at public authorities involved in the national implementation of the EPC for the five professions currently covered by the procedure.
- Section C was aimed at professional organisations representing any of the five EPC professions.
- Section D was aimed at public authorities involved in the implementation of the alert mechanism.

In what follows below, we give our analysis of the responses. Our analysis follows the same order as the questionnaire.

Most of the questions were composed of multiple choice questions and using scales of measures (we used 5-point or 6-point scales), where respondents were asked to share opinions and views.

The survey also invited the respondents to make general remarks and suggestions on the relevant initiatives and on the relevant IMI modules.

The results of the survey have been published on the Commission website together with the individual responses[29].

The survey questions are annexed to this staff working document.

2. Description of the survey respondents

The public consultation on experiences with the EPC and the alert mechanism received a total of 181 responses from public authorities and professional organisations. The consultation also received one separate submission per email and four position papers within the closing date of the consultation period. Another two position papers were submitted after the end of the

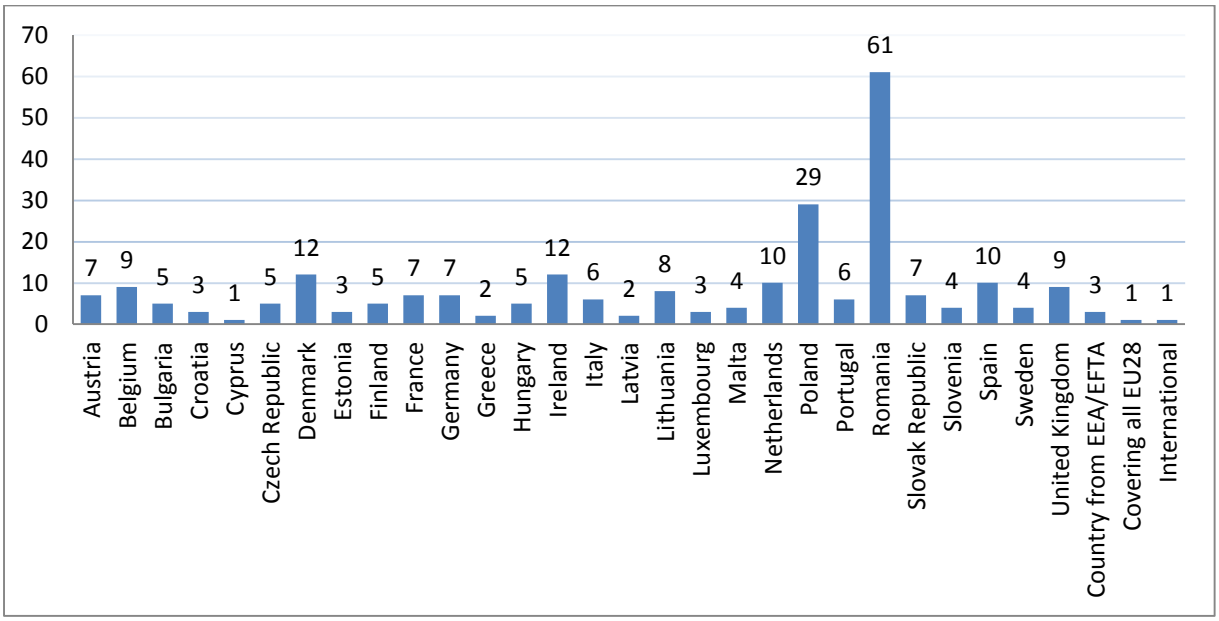
[29] https://ec.europa.eu/growth/content/take-part-our-survey-first-year-european-professional-card-0_en

consultation period. The contributions submitted after the closing date are valuable contributions to the general assessment of the EPC and alert mechanism procedures but they have not been considered in the analysis of the results of this particular survey.

The majority of the respondents were public authorities (119 responses accounting for 66 % of the total number of responses) involved in the implementation of the EPC and/or with the alert mechanism. In addition, 62 professional organisations (34 % of the total number of participants) contributed to the survey, representing one of the five EPC professions.

The survey respondents provided a good geographic coverage. There was an average of 8 respondents per country (or all EU28, EEA/EFTA, international), with a large number of responses from Romania (61 respondents) and Poland (29 respondents)[30].

Diagram 20: Distribution of survey respondents per country, EU28, EEA/EFTA, international



Source: EU survey 'Survey on the experiences with the European Professional Card and the alert mechanism procedures'

The different sections were responded to as follows:

- **51** public authorities responded to **Section B** aimed at public authorities who are involved in the national implementation of the EPC for the five professions that are currently covered by the procedure;
- **43** professional organisations responded to **Section C** aimed at professional organisations representing any of the five EPC professions;
- **95** public authorities responded to **Section D** aimed at public authorities who are involved in the implementation of the alert mechanism.

[30] The respondents could choose more than one country of representation, hence the total responses to these questions were 251.

Some public authorities responded to both Section B and D (these respondents were involved in the implementation of both the EPC and the alert mechanism), in which case they are only counted once in terms of the total number of respondents (181).

3. Analysis of responses to Section B of the questionnaire - public authorities involved in the national implementation of the EPC

3.1. Responsibilities of the survey respondents

51 public authorities responded to this section of the survey, of which the majority were competent authorities responsible for one of the health professions:

- 25 % of the responding authorities were responsible for nurses responsible for general care (25 answers);
- 21 % of the responding authorities were responsible for physiotherapist (21 answers);
- 20 % of the responding authorities were responsible for pharmacists (20 answers);
- 8 % of the responding authorities were responsible for real estate agents (8 answers);
- 8 % of the responding authorities were responsible for mountain guides (8 answers).

We also received input from authorities acting either as national coordinators for the recognition of professional qualifications, national IMI coordinators (NIMICs) or assistance centres under the Professional Qualifications Directive. Given that one public authority might have several roles and responsibilities in this context, the number of **received** answers (99 answers) is higher than the number of responding authorities (51 public authorities).

Diagram 21: Public authorities responding to Section B of the survey

The role of the public authority	Responses	Percent
EPC competent authority for nurses responsible for general care	25	25 %
EPC competent authority for pharmacists	20	20 %
EPC competent authority for physiotherapist	21	21 %
EPC competent authority for real estate agents	8	8 %
EPC competent authority for mountain guides	8	8 %
National coordinator for the recognition of professional qualifications	8	8 %
Assistance centre under the Professional Qualifications Directive	7	7 %
National IMI coordinator (NIMIC)	2	2 %
Total responses	99	100 %

Source: EU survey ‘Survey on the experiences with the European Professional Card and the alert mechanism procedure’

3.2. Main issues analysed in this section

Section B asked for the view of public authorities on the following three main issues:

- The EPC procedure – delivering benefits
- Procedural fees
- The EPC procedure and the relevant IMI features

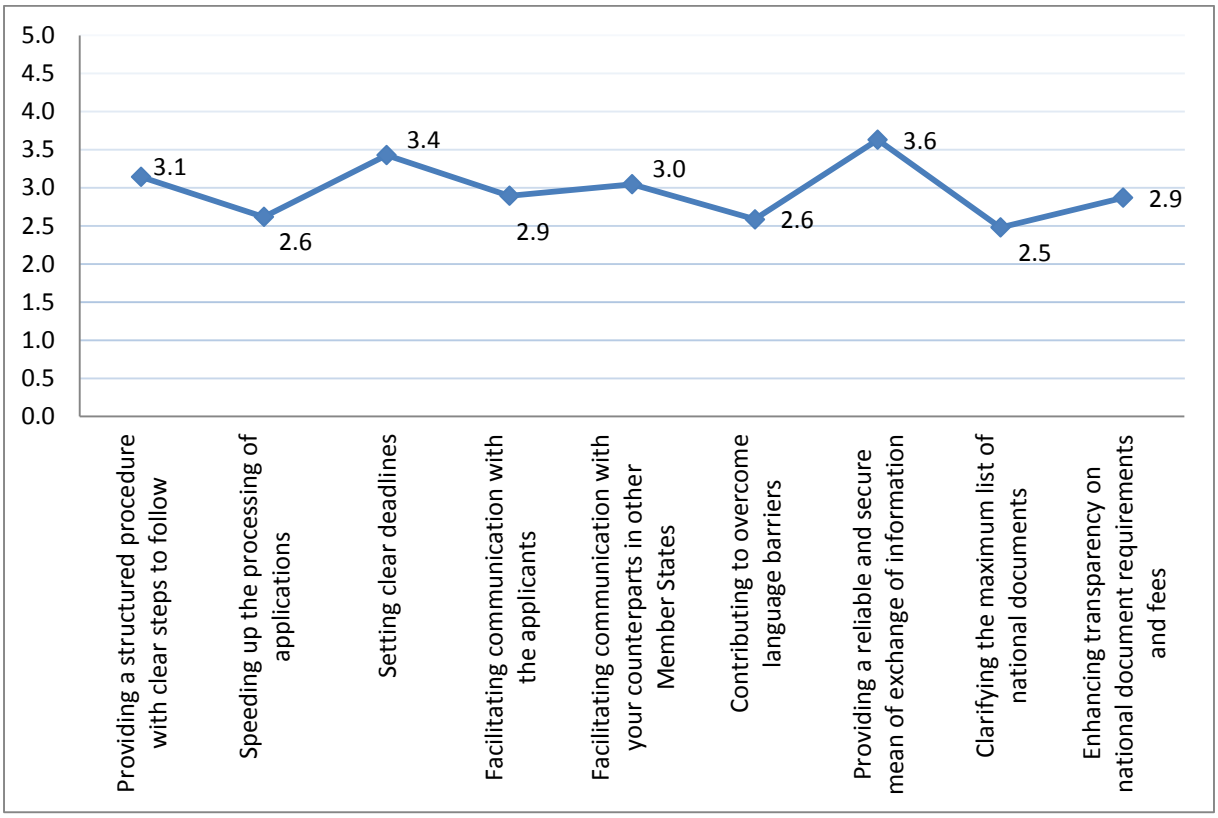
In the remainder of Section 3.2, we will look at the responses to each of these three issues.

(i) The EPC procedure – delivering benefits

First of all, public authorities were invited to express their views on the extent to which the EPC procedure, implemented through the IMI system, delivers benefits in handling professionals' applications.

Public authorities were asked to use a scale from 0 to 5 and express their views on the potential benefits of the system[31]. The following table and chart show the responses received from public authorities.

Diagram 22: Public authorities' views - Benefits delivered by the EPC procedure (Question B4)



Source: EU survey 'Survey on the experience with the European Professional Card and the alert mechanism procedure'

[31] Does not deliver any benefit (0); delivers poorly (1); delivers fairly (2); delivers well (3); delivers very well (4); or delivers excellently (5).

These results proved that public authorities found that the EPC procedure, implemented through the IMI-system, delivers well the analysed benefits in handling professionals' applications.

Public authorities particularly appreciated that the EPC procedure is:

- 'providing a reliable and secure mean of exchange of information' (rated at 3.6);
- 'setting clear deadlines' (rated at 3.4);
- 'providing a structured procedure with clear steps to follow' (rated at 3.1).

It is also important to highlight that public authorities generally replied **very positively** to this question: they found that the EPC procedures deliver potential benefits in handling the relevant applications. From the results received none of the analysed potential benefits received scoring that the EPC would not at all deliver any of these benefits, and only 2% considered that the EPC would deliver them poorly.

The survey showed that public authorities liked the secure means of information exchange. The IMI system in general, and the EPC procedure more specifically, are implemented in line with the relevant EU data protection framework. Within the EPC procedures, access rights are therefore limited. The only parties with access to the professional's data are: the professionals themselves and the relevant competent authorities directly involved in handling an EPC application. Neither the Commission, nor any other third parties have access to professionals' individual applications. However, interested third parties (employers, patients, other national bodies) can check the validity of an issued EPC certificate through a specific validation function available online[32].

Survey respondents said that the EPC procedure also offers a clear and structured procedure for the competent authorities in order to facilitate the handling of applications within the applicable legal frameworks. Even though some of the survey respondents found the applicable deadlines 'burdensome' and 'too tight', public authorities still liked the clarity and the structure introduced by this electronic procedure. Following user feedback, the Commission made several developments of the IMI system to further improve the user experience. For example, currently a built in timer feature informs the relevant competent authorities about the remaining deadlines for a particular application[33].

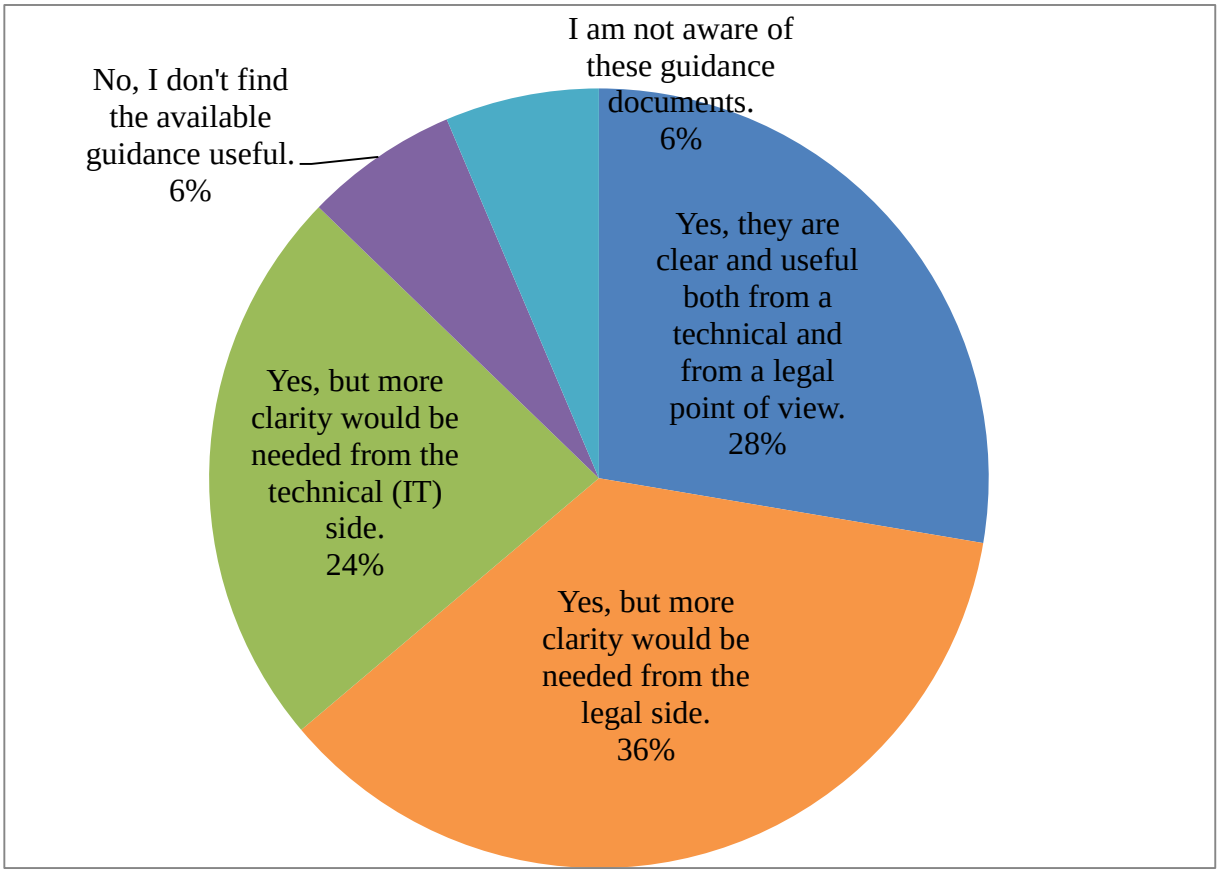
The EPC procedure is implemented in a way that the home competent authority is responsible in making sure that the professional's application is complete before it is transferred to the host Member State. The home authority assists professionals by clarifying the applicable document requirements and by providing them directly with some of the relevant supporting documents or proofs.

The maximum list of documents is outlined by Annex II of Commission Implementing Regulation (EU) 2015/983. This Regulation also lays down the rules concerning the requests

[32] https://ec.europa.eu/epc/public/validity?locale=en
[33] The updates were implemented after the survey's publication on 17 March 2017.

for translations, certified documents and sets a procedure for the payment of any fees. Given that the national document requirements differ greatly between Member States, a so-called repository solution was implemented in IMI where the host countries can specify their document and fee requirements. To date, this repository has not been completed by all Member States and for all the relevant professions. The lack of information on these requirements might be one of the reasons why the EPC procedure was not rated as highly as expected amongst the benefits of making the processing of applications swifter. This was also reflected in the answers to question B8 on the usefulness of the available guidance.

Diagram 23: Public authorities' views - Do you find the available user guide and legal guidance useful when processing EPC applications/completing notifications to the EPC repository? (Question B8)



Source: EU survey 'Survey on the experiences with the European Professional Card and the alert mechanism procedure'

Legal and technical guidance is already available online[34], including a document on the 'Conditions for requesting translations and certified copies under the EPC procedure'. There have also been several discussions within the group of coordinators on this guidance. Nevertheless, we recognise that not all the competent authorities seem to be familiar with this guidance. Therefore, there is the need to raise more awareness on these documents and if necessary provide further legal and practical guidelines on the **document requirements** of the EPC procedure. The Commission is also committed to making sure that Member States

[34] http://ec.europa.eu/internal_market/imi-net/library/index_en.htm

keep the information on their document requirements and applicable fees fully complete and updated in the IMI EPC repository.

Survey responses by public authorities also gave the Commission important feedback on the need to further improve the built-in translation features of the IMI system. The EPC procedure, and the IMI in general, aim to make communication between the relevant national competent authorities easier and to overcome language barriers. Respondents indicated that there is still room for improvements in this area. This applies equally for the extensive national translation requirements (see above), but also related to the automatic translation functionality of the IMI system[35].

The Commission also provided extensive guidance to competent authorities that were acting as home Member States for a profession that was not regulated in their Member State. This issue came up most specifically in the case of mountain guide and real estate professions.

This guidance and exchanges helped shaping the practices of these authorities as regards validation and authentication of documents requested by the host Member State. They also helped Member States to better understand how to establish internal cooperation mechanisms to carry out their tasks. Bilateral exchanges helped Member States to clarify how to proceed with the validation of certain evidences of professional qualifications or work experience of professionals in case neither the profession nor the training was regulated in the host Member State.

Finally, it is equally important to highlight that public authorities did not provide any specific feedback that would have revealed any particular patient safety threats, especially for the professions in health area. Before the introduction of the EPC, some stakeholders had voiced concerns about such threats[36].

(ii) Procedural fees

The Directive[37] contains some general limitations as regards the potential fees national authorities may charge in relation to the EPC procedures. It states that '*any fees which applicants may incur in relation to administrative procedures to issue a European Professional Card shall be reasonable, proportionate and commensurate with the costs incurred by the home and the host Member States and shall not act as a disincentive to apply for a European Professional Card.'*

Based on the information notified by the Member States via the IMI EPC repository[38], fees charged for EPC procedures vary across Member States depending on the profession, the

[35] Also covered by Question B9 : The ease of use of functions in the EPC module in IMI

[36] SWD(2015) 123 final Commission staff working document accompanying Commission Implementing Regulation (EU) No 2015/983 on the procedure for issuance of the European Professional Card and the alert mechanism pursuant to Directive 2005/36/EC of the European Parliament and of the Council {C(2015) 4209 final}.

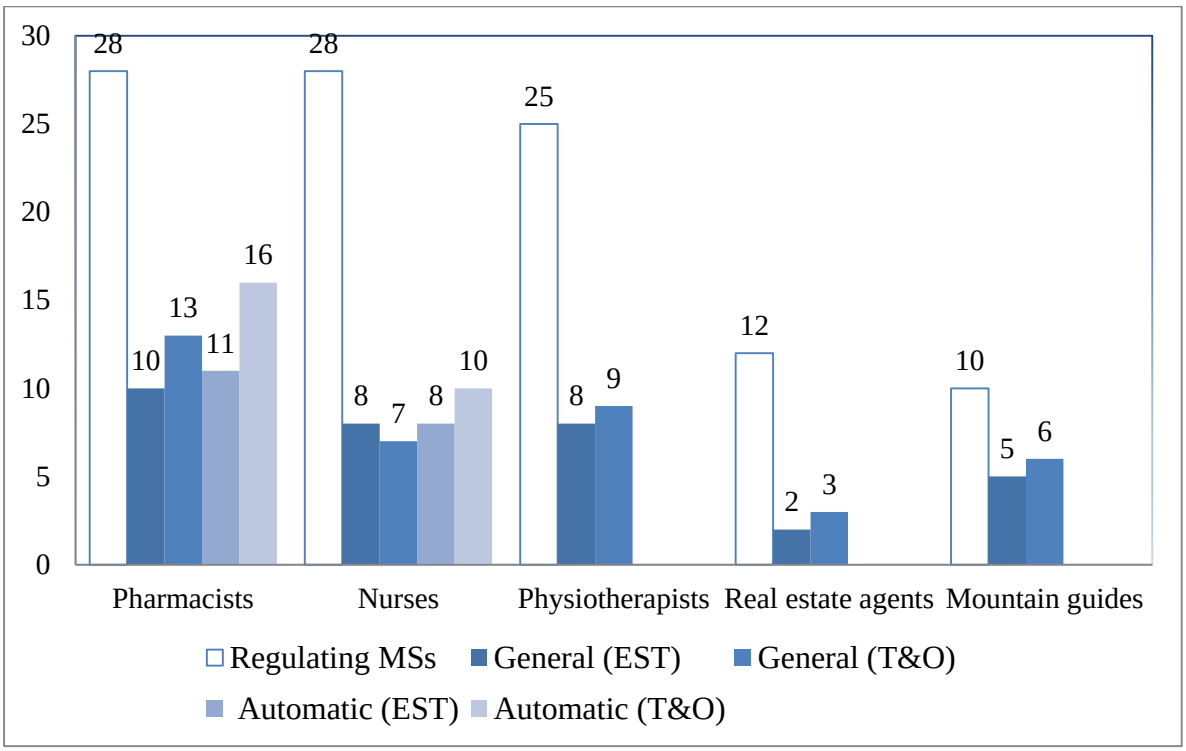
[37] In its Article 4a(8).

[38] Information on the fees charged for EPC applications is also available through the simulator on 'Your Europe' website (http://europa.eu/youreurope/epc).

purpose (establishment or temporary service provision), and the regime of recognition (automatic or general system of recognition).

The diagram below shows a number of Member States that choose not to impose any fees for handling EPC applications for all or some professions or recognition regimes while acting as a home and as a host competent authority.

Diagram 24: Number of Member States that regulate the relevant profession but do not charge any fees for handling of EPC applications (as home and as host competent authority), per purpose (establishment (EST) or temporary service provision (T&O)) and recognition regime (automatic or general system of recognition)[39]

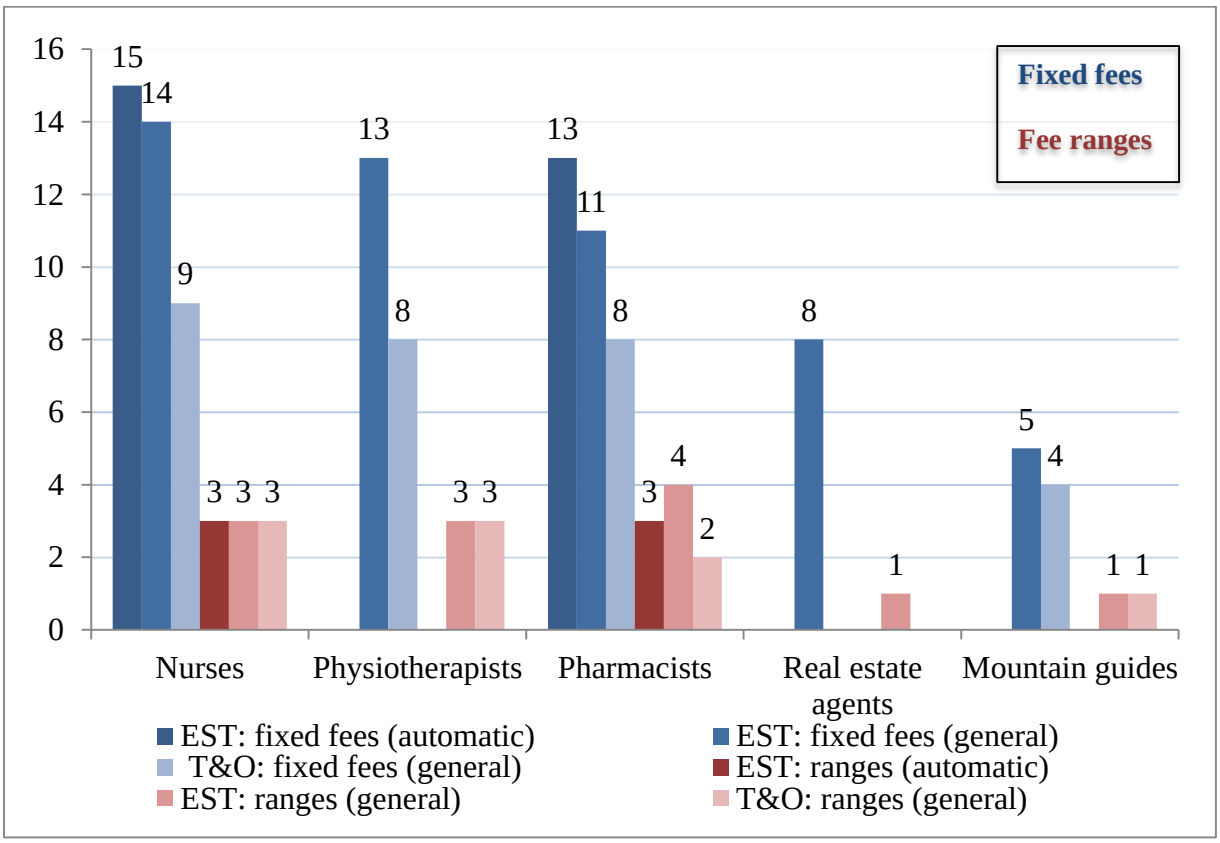


Source: IMI EPC Repository, November 2017

Most of the Member States that impose fees have notified fixed levels of the fees. Although the level of fixed fees varies greatly (from less than EUR 10 to up EUR 500), in most Member States fixed fees do not exceed EUR 150. In addition, some Member States notified fee levels in **ranges** depending on the work that is involved in treating EPC applications, or pending more precise determination of the fees. For instance, Germany has notified a fee range from EUR 0 to EUR 300 for real estate agents, and a fee range from EUR 10 to EUR 400 for all other professions.

[39] In addition, in several instances Member States reported that they impose fees only if they are acting either as home or as host authority. The 'Automatic (EST)' and 'Automatic (T&O)' data are not relevant for real estate agents and mountain guides, i.e., professions that do not benefit from automatic recognition regime under Directive 2005/36/EC.

Diagram 25: Number of Member States charging fees (fixed or in ranges) as host country competent authority, by purpose (establishment (EST) or temporary service provision (T&O)) and recognition regime (automatic or general system of recognition)[40]

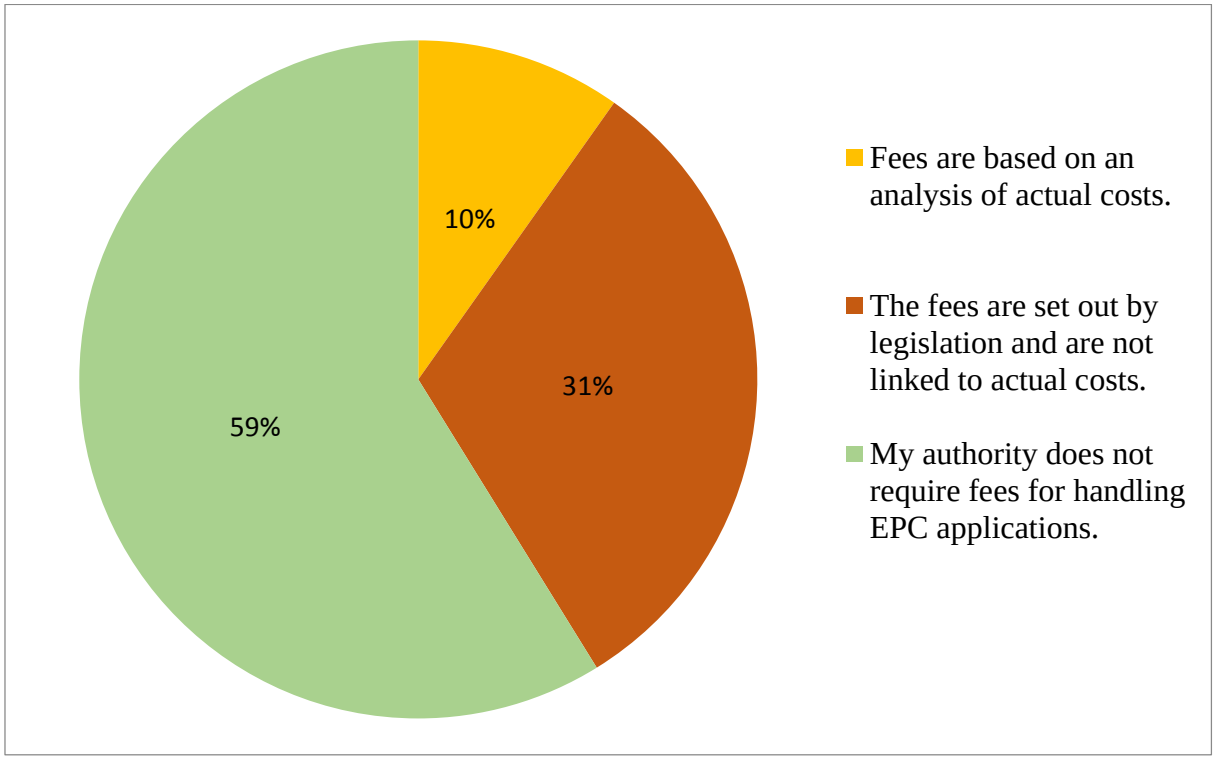


Source: IMI EPC Repository, November 2017

The survey asked public authorities to explain how they implemented EPC provisions as on fees in their national processes.

[40] Member State regions (in particular this is relevant for Austria, Germany and the UK) have been counted as one Member State (e.g., where 3 regions charge fixed fees and 1 region of the same country charges fess in ranges, that same Member State was counted for each scenario).

Diagram 26: Public authorities' views - Should your authority apply fees for handling EPC applications, do you thoroughly analyse the actual costs involved? (Question B10)

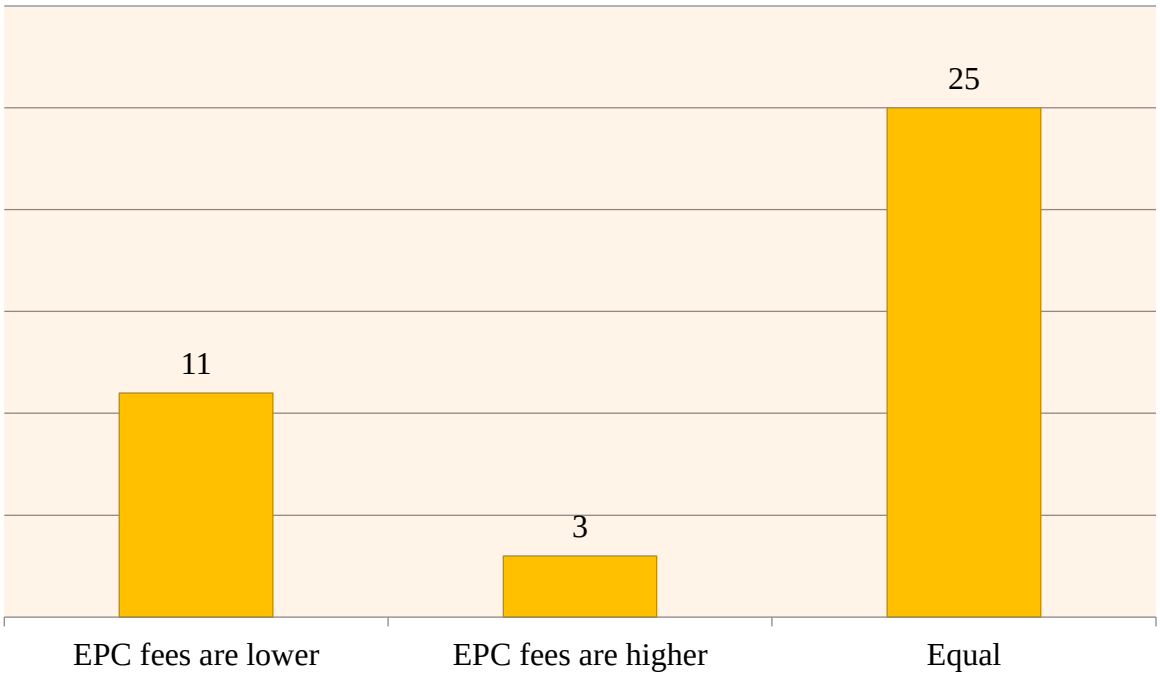


Source: EU survey 'Survey on the experiences with the European Professional Card and the alert mechanism procedure'

The responses received to this question indicate that, in 31 % of cases, these fees were set by legislation and not linked to the actual costs of processing the application. However, it is to be noted that these cases may include fees that are both higher and lower than the actual costs. Where the fees are lower than the actual costs, there should be no unjustified disincentives to apply for an EPC.

This might also be the reason why only three authorities responded that they apply higher fees for the EPC procedures compared to the 'traditional recognition procedures'. 25 responses indicated that they apply the same fees for both EPC procedures and traditional procedures.

Diagram 27: Public authorities' views - Should your authority apply fees for handling EPC applications as a home or a host Member State, how do these EPC fees correspond to the fees of the traditional recognition procedures? (Questions B11-12)

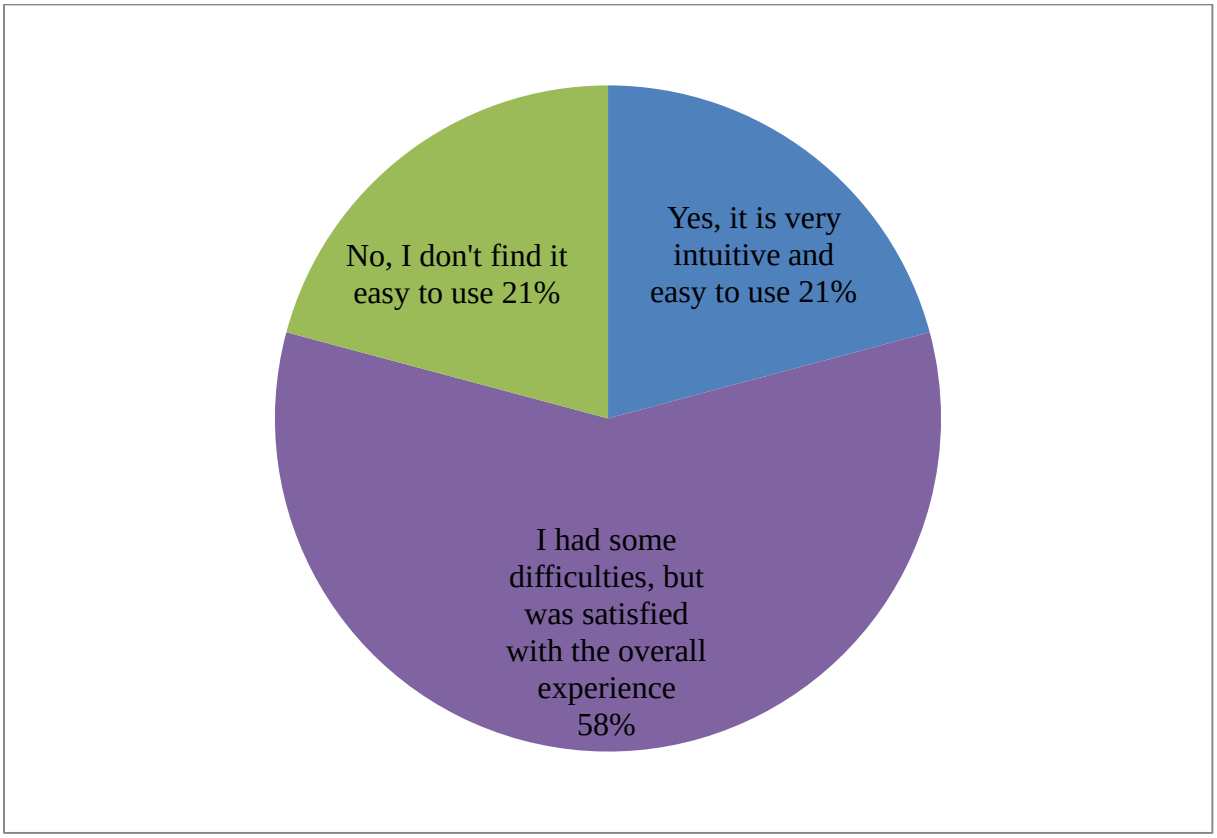


Source: EU survey 'Survey on the experiences with the European Professional Card and the alert mechanism procedure'

(iii) The EPC procedure and the relevant IMI features

In general, the responding public authorities highly appreciated the EPC IMI module. More than three quarters of the respondents were satisfied with the overall experience or found the module intuitive and easy to use. Only 21 % of the respondents said that they did not find the module easy to use.

Diagram 28: Public authorities' views - Based on your overall experience have you found the EPC IMI module easy to use? (Question B5)



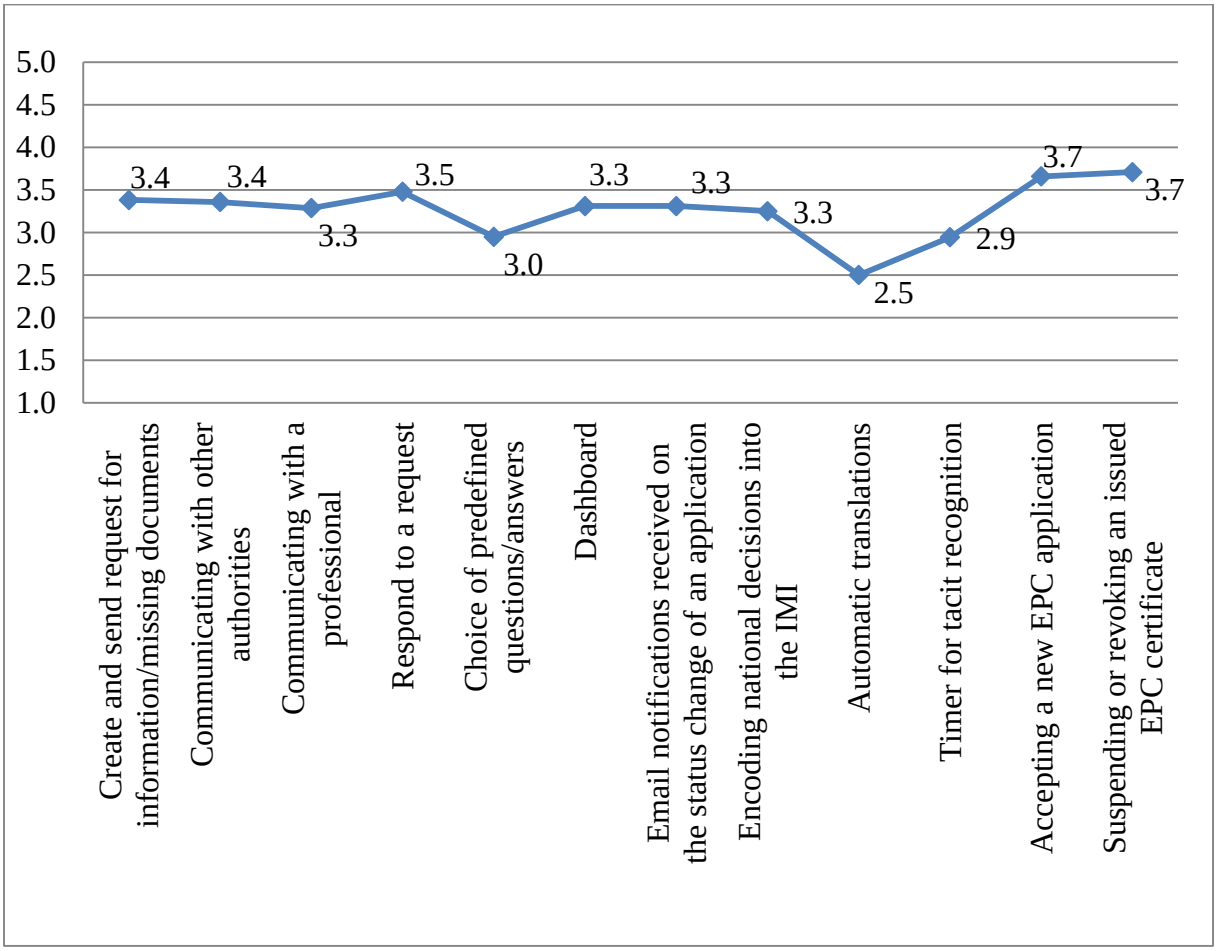
Source: EU survey 'Survey on the experiences with the European Professional Card and the alert mechanism procedure'

Public authorities were also asked to evaluate the ease of use of different functions in the EPC IMI module by using a scale[41].

The following diagram outlines the responses received.

[41] Indicating whether the functions are: poor (1); fair (2); good (3); very good (4); or excellent (5).

Diagram 29: Public authorities' views - The ease of use of functions in the EPC module in IMI (Question B9)



Source: EU survey 'Survey on the experience s with the European Professional Card and the alert mechanism procedure'

Public authorities in general were satisfied with the ease of use of the relevant EPC IMI functionalities. Respondents were least satisfied with the IMI automatic translation tool.

4. Analysis of the responses to Section C of the questionnaire - professional organisations representing the EPC professions

4.1. Analysis of the respondents to Section C

Section C of the survey was addressed to professional organisations representing any of the five EPC professions.

Some 43 professional organisations responded to this Section.

These respondents mostly represented one (or more) of the health professions covered by the EPC procedure:

- 33 % represented nurses responsible for general care (15 answers);
- 33 % represented physiotherapists (15 answers);
- 16 % represented pharmacists (7 answers).

In addition, 11 % of the responding professional organisations represented real estate agents (5 answers); and 7 % represented mountain guides (3 answers).

Given that one professional organisation might represent more than one of the EPC professions, the number of contributions received (45 answers) was higher than the number of responding organisations (43 professional organisations).

Diagram 30: Professional organisations responding to Section C

The responsibility of the professional organisation	Responses	Percentage
Nurses responsible for general care	15	33 %
Pharmacists	7	16 %
Physiotherapists	15	33 %
Real estate agents	5	11 %
Mountain guides	3	7 %
Total number of responses	45	100 %

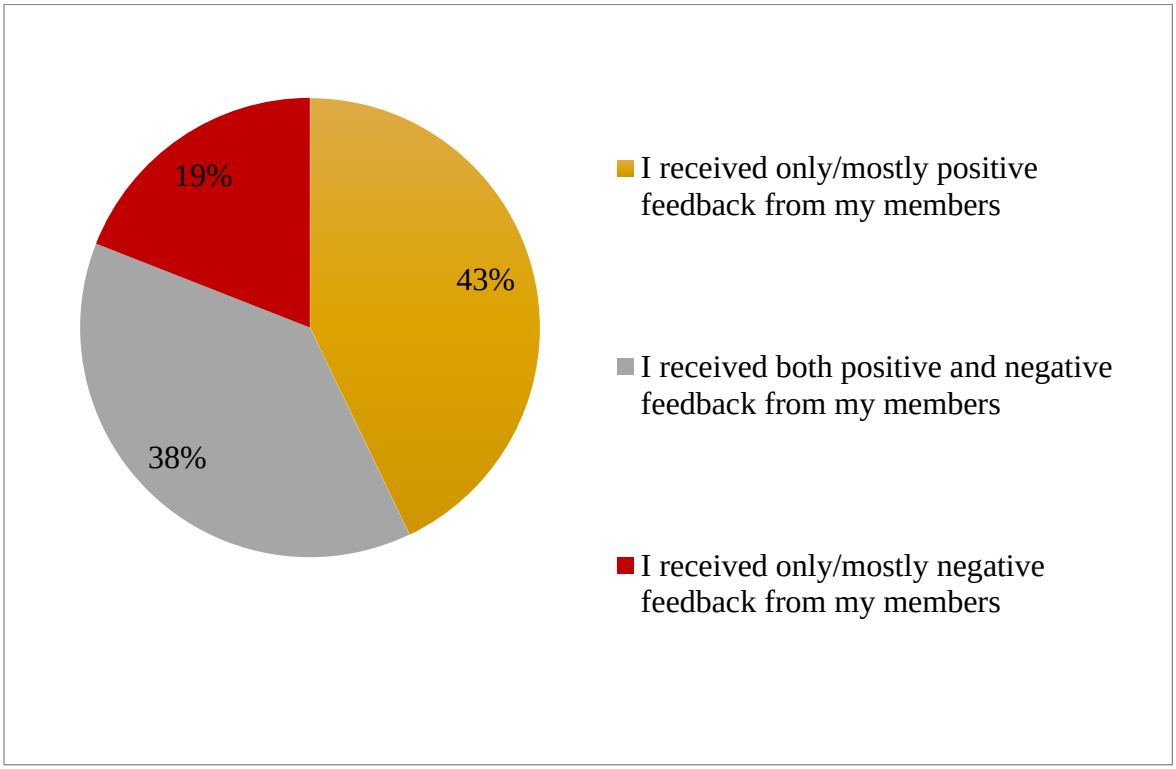
Source: EU survey 'Survey on the experiences with the European Professional Card and the alert mechanism procedure'

4.2. The EPC procedure –views of professional organisations

Professional organisations, representing the professions who currently benefit from EPC, were asked to report on their members' views of the EPC procedures in a number of questions.

In general, professional organisations gave good feedback on the EPC procedure. Only 19 % of the respondents indicated that they received only or mostly negative feedback from their members, while the other responses were rather positive or neutral.

Diagram 31: Overall how would you assess the feedback you received from your members on the EPC procedure? (Question C4)

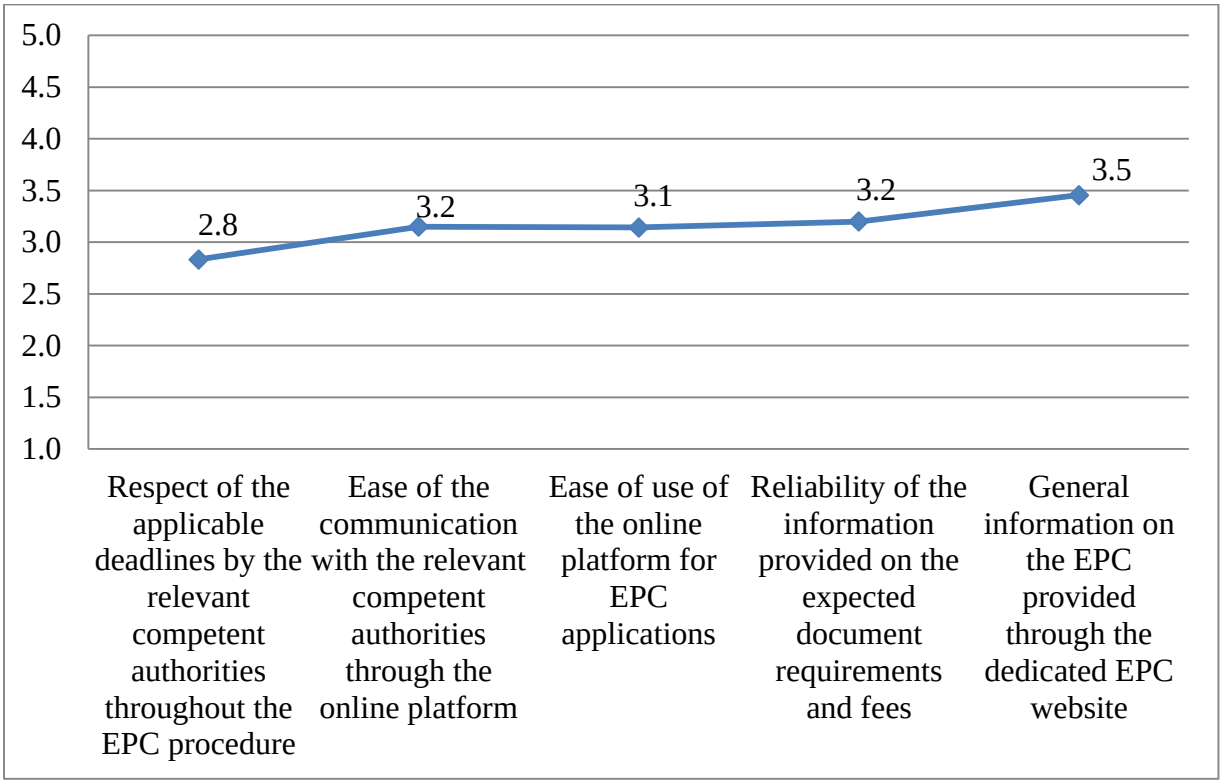


Source: EU survey 'Survey on the experiences with the European Professional Card and the alert mechanism procedure'

Professional organisations were also asked to report on professionals' opinions of certain characteristics of the EPC procedure by indicating their views on a scale[42].

[42] poor (1); fair (2); good (3); very good (4); or excellent (5)

Diagram 32: Professionals' views of certain characteristics of the EPC procedure (Question C5)



Source: EU survey 'Survey on the experiences with the European Professional Card and the alert mechanism procedure'

On average, the respondents a 'very good' assessment of the above characteristics. Professional associations particularly liked the information on the procedure available through the 'Your Europe' website.

Nevertheless, professional organisations also saw room for improvement on the relevant competent authorities' compliance with the applicable deadlines throughout the EPC procedure.

However, the main concerns were about the **procedures' fee and document requirements**. Although professional organisations liked that professionals could get informed about the expected fees and document requirements in advance, they often reported that the relevant host competent authorities imposed heavier document requirements in reality than initially indicated.

The professionals were also concerned that although the EPC attested the recognition of qualifications, professionals were still required to complete **additional steps** (registration, licensing etc.) before they could provide their activities in the host Member States, and that these additional steps were often burdensome.

A final issue was raised at the workshop of May 2017: **tacit recognition**. Professional organisations appreciated that this feature has the potential to be advantageous for

professionals by ensuring applications were not left unattended. However professionals reported difficulties in certain Member States and professions, where the EPC provisions were not properly transposed. In these cases professionals were not able to use their tacitly issued EPCs to access the profession in the host Member States (or to complete the necessary registration processes). These concerns were also echoed by national authorities that were acting as home Member States in the processes. The concerns were carefully followed up on by the Commission. Nevertheless, this issue was a temporary problem linked to a late transposition of the EPC-related provisions of the Directive by certain Member States and is now fully resolved.

The Commission always made clear that a tacitly issued EPC has the same value and effects as any other recognition decisions, in accordance with the legal provisions, and this was not contested by the stakeholders.

Finally, it is equally important to highlight that professional organisations, like public authorities, did not provide any specific feedback that would have revealed any particular patient safety threats, especially concerning the three health professions concerned. Before introduction of the EPC some of the stakeholders voiced concerns about such threats[43].

5. Analysis of the responses to Section D of the questionnaire - public authorities involved in the implementation of the alert mechanism

5.1. Analysis of the respondents to Section D

A total number of 95 public authorities involved in the implementation of the alert mechanism responded to Section D of the survey.

These public authorities had different responsibilities:

- 36 % indicated that they were responsible for the module concerning falsified diplomas (56 answers);
- 15 % indicated that they were responsible for the prohibition/restriction of "other health professions" module (24 answers);
- 12 % indicated that they were responsible for the prohibition/restriction of nurses responsible for general care module (19 answers);
- 10 % indicated that they were responsible for the prohibition/restriction of professions concerning the education of minors module (16 answers);
- 10 % indicated that they were responsible for the prohibition/restriction of doctors module (15 answers);
- 6 % of the respondents were acting as national coordinators for the recognition of professional qualifications (10 answers);

[43] SWD(2015) 123 final Commission staff working document accompanying Commission Implementing Regulation (EU) No 2015/983 on the procedure for issuance of the European Professional Card and the alert mechanism pursuant to Directive 2005/36/EC of the European Parliament and of the Council {C(2015) 4209 final}.

- 4 % of the respondents were assistant centres under the Professional Qualifications Directive (7 answers);
- 4 % indicated that they were responsible for the prohibition/restriction of veterinary professions module (7 answers);
- 2 % of the respondents were acting as national IMI coordinators (NIMICs) (3 answers).

One public authority can have several roles and be responsible for more than one of the above alert modules. Hence the number of answers (157 answers) does not correspond to the number of responding authorities (95 public authorities).

Diagram 33: Responsibilities of public authorities who responded to Section D

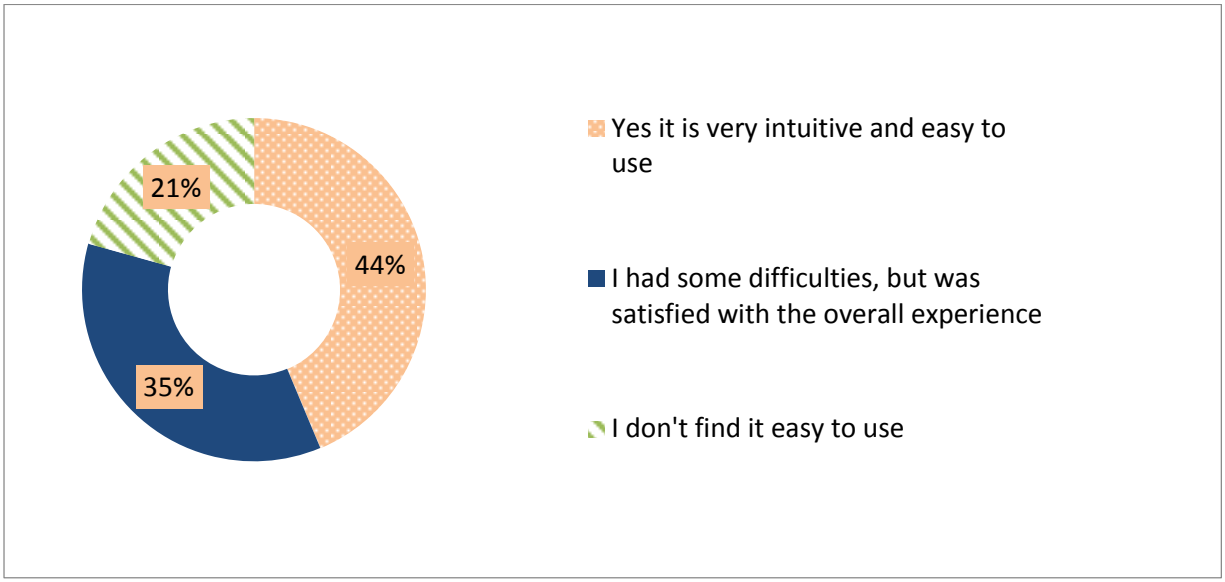
Responsibilities of the public authorities	Respondents	Percentage
Prohibition/restriction of doctors	15	10 %
Prohibition/restriction of nurses	19	12 %
Prohibition/restriction of veterinary professions	7	4 %
Prohibition/restriction of other health professions	24	15 %
Prohibition/restriction of professions for the education of minors	16	10 %
Falsified diplomas	56	36 %
National IMI coordinator (NIMIC)	3	2 %
National coordinator for the recognition of professional qualifications	10	6 %
Assistance centre under the Professional Qualifications Directive	7	4 %

Source: EU survey 'Survey on the experiences with the European Professional Card and the alert mechanism procedure'

5.2. The alert mechanism - views of the public authorities

Public authorities in general were satisfied with the overall experience of the alert mechanism. 79 % of the responding authorities indicated that they either find the system very intuitive and easy to use, or that despite certain difficulties they were satisfied with the overall experience. Only 21 % of the respondents did not find the mechanism easy to use.

Diagram 34: Based on your overall experience did you find the alert mechanism easy to use? (Question D6)



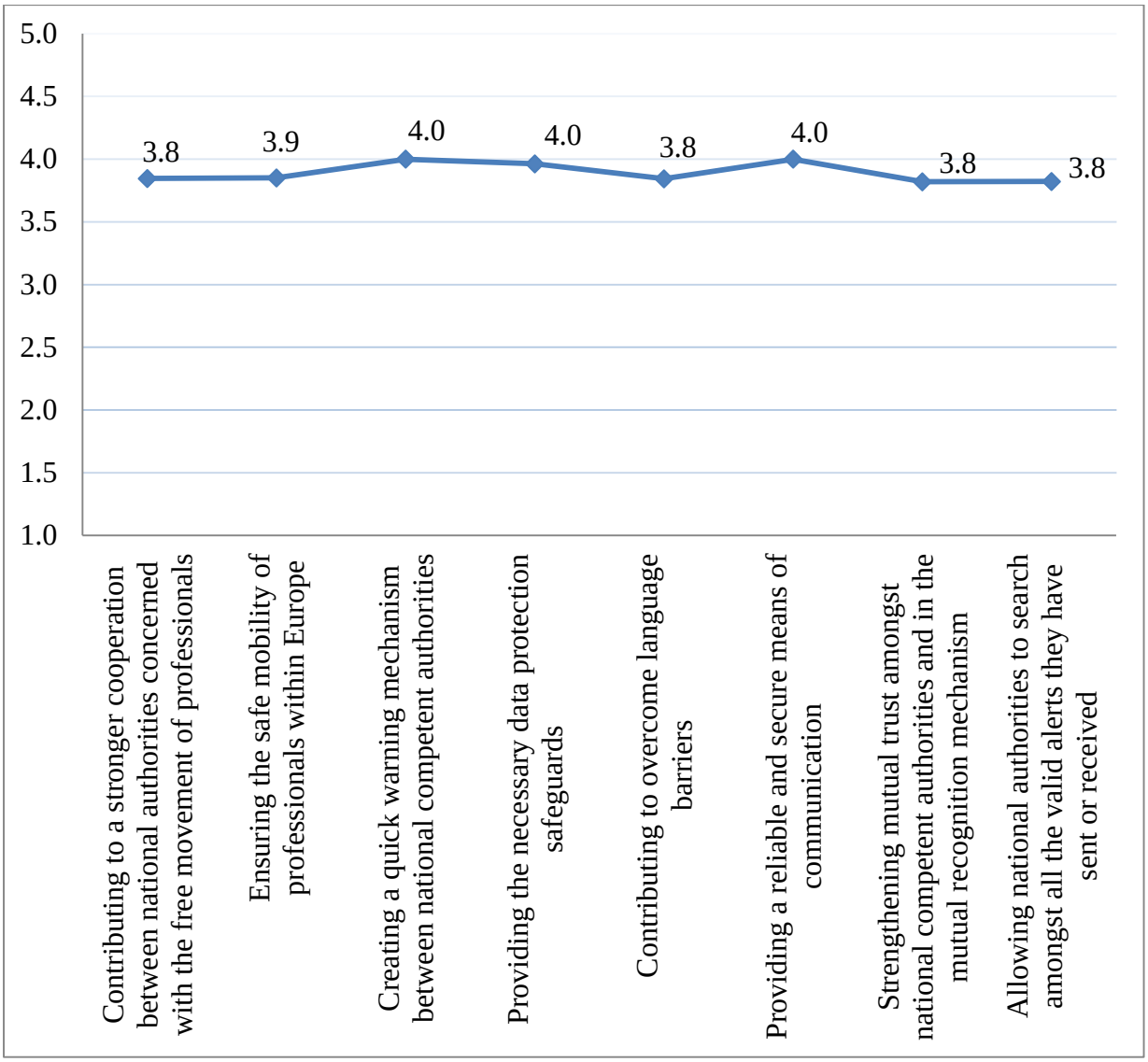
Source: EU survey 'Survey on the experiences with the European Professional Card and the alert mechanism procedure'

When looking at specific challenges and benefits of the alert mechanism the following main points could be observed:

Competent authorities especially liked that the alert mechanism:

- contributes to stronger cooperation for safe mobility;
- provides the necessary data protection safeguards;
- works as a quick warning mechanism among authorities;
- enables authorities to search among valid alerts that they sent or received.

Diagram 35: Benefits delivered by the alert mechanism (Question D5)



Source: EU survey 'Survey on the experience s with the European Professional Card and the alert mechanism procedure'

The main challenge for the competent authorities was **the high number of alerts**, an issue already discussed in point 4 of Chapter II of this staff working document. In order to facilitate the work of the competent authorities further, Commission made new releases to the search function of the IMI alert module. There was also an extensive information exchange on national sanctions and disciplinary systems in the group of coordinators.

However, competent authorities pointed out that they were not always aware of the information exchanges on national sanctions in the group of coordinators, and asked for more transparent information. They also asked for further guidance on how to categorise alerts, namely the ones concerning prohibition or restriction of professionals. This is because

authorities are asked to indicate in IMI for each alert whether the alert was sent on the basis of 'substantial reasons'[44] or 'other reasons'[45].

They also requested further operational developments (more specifically on the translation functions of the IMI alert module) and asked to Commission to consider developing specific modules for professions that have many alerts. This could especially be considered within the "other health professions" module.

[44] The prohibition or restriction to perform the professional activities when the professional is deemed not fit to practise.
[45] The prohibition or restriction to perform the profession due to administrative reasons such as the non-payment of fees or the renewal of membership with a professional organisation.

IV. CHANGES TO IMI FUNCTIONALITY AND THE EPC PROFESSIONALS' INTERFACE SINCE THE LAUNCH OF THE EPC AND THE ALERT MECHANISM

1. Collecting feedback from professionals and end-users of IMI

Since the EPC procedure and the alert mechanism were launched in IMI, the Commission and Member States have been continuously monitoring the use of the system and the new IMI modules. They have collected user feedback and identified how the features of the IMI could be further improved. Feedback collected from end-users of the IMI system (including from professional organisations and assistance centres in Member States) was discussed on several occasions in expert group meetings and with the network of national IMI coordinators. The IMI helpdesk always tried to address any identified technical issues as soon as possible and avoid the reoccurrence of difficulties encountered. Since January 2016 several major improvements have already been put in place and further improvements are planned.

2. System improvements

Since the EPC module was launched in IMI, the first experiences revealed a need for several IMI improvements to help public authorities handle EPC applications in a timely fashion. In particular, the following improvements were made to better assist public authorities.

- Since public authorities were not fully aware of deadlines for the procedure, the IMI user interface was improved already in 2016 to display all deadlines for a given EPC application (legal and technical) in the full view of EPC applications. In addition, by the end 2017 IMI also included the ability to sort EPC applications by submission date, last update and tacit recognition dates.
- The IMI dashboard has been improved to make it easier to access not only EPC applications on which an IMI user has recently taken an action, but also the ones for which an EPC has been issued and where the user was acting on behalf of the home or the host authority.
- The maximum length of messages has been increased to facilitate communication with professionals.
- An EPC monitoring function in IMI was released. It enables identified users in Member States can have a full overview of all EPC-related activities in IMI. This new feature enables IMI coordinators easily to identify procedural issues (without access to personal data), when public authorities fail to act on EPC applications in a timely manner.
- For exceptional cases, a new feature has been released in IMI to make it easier to request missing documents, to forward or to eventually refuse erroneously submitted EPC applications following the expiry of the one week legal deadline.
- A suspension function (temporary deactivation) has been developed in IMI for all EPC applications. This functions makes it possible to undo incorrect actions (e.g., where a

public authority mistakenly revokes or issues an EPC) without the involvement of the IMI helpdesk.

- Based on end-user feedback the IMI actions for document validation were simplified by streamlining related error messages, improving the list of document validation messages in 2016, and subsequently displaying more clearly when and by whom documents were validated or updated in IMI.
- Towards the end of 2017 a new IMI feature was released. It enables host countries to report that they have received an incomplete EPC application and requires the home authorities to follow up on such EPC applications.

The requested improvements to the EPC public interface of professionals mainly concerned information about document requirements and cases where professionals had to submit new or multiple EPC applications. The following main improvements were made to assist professionals.

- In 2016, a 'copy' function was developed for professionals. This new feature makes resubmission of withdrawn, rejected, expired or closed EPC applications easy and straight forward. It enables professionals to submit additional EPC applications without having to re-enter the same information or reselect the same documents.
- In 2016 the IMI team improved the public professionals interface by adding a full display of the document requirements notified by Member States and fees into the process of submitting EPC applications. This is in addition to the document simulator on 'Your Europe' website that already enables professionals to check the list of documents and the applicable fees before to submitting their application.
- For EPC applications for temporary and occasional service provision the IMI team has created additional reminders for professionals to ensure that they are aware of the limited validity and expiry of their EPCs. The new reminders invite professionals to request the extension of validity for their EPCs whenever needed.
- The information sections on the professionals' interface have also been improved. Particular attention was paid to improving the information on automatically recognised qualifications of general care nurses and pharmacists (the interface now clearly displays which diplomas are recognised automatically).

IMI improvements to the alert mechanism were mostly made because of the unexpectedly high volume of alerts that were recorded in IMI, which was observed already during the first days after the opening of the corresponding modules of the system. The following improvements were made to facilitate the daily work of IMI users with alerts about prohibitions and restrictions of professionals and on falsified diplomas.

- In early 2016, the IMI team revised the list of recipients to whom the system sends automated email messages. The number of automatic emails reduced further by deactivating certain messages considered unnecessary by the users. The content of alert related automatic emails has also been improved by adding information about the

initiating country, the profession concerned, the type, the nature and the reason for the restriction.

- In 2016, the Commission developed a new 'access personal data' function that allows alert coordinators to access personal data of an alert with a single click (this feature replaced the previous cumbersome procedure where alert coordinators had to go through several steps to add their own authority as responsible for that alert).
- Following user feedback the IMI team has put in place an amended list of professions in the different alert modules. The team also improved the search criteria and the exportable search-result list of the different alert forms.

3. Further system improvements already developed and awaiting release

At the end of 2017 the IMI team released the technical improvements and changes to the professionals' interface that were requested by professionals, Member State representatives and assistance centres. Moreover, the Commission developed new IMI features related to EPC processing by public authorities and to the alert mechanism. However, these features are pending to be released to end-users of the IMI system. These improvements are currently being fine-tuned and are expected to be made available in the first quarter of 2018. They include the following:

- an automated selection of initiating country, which will make recording of alerts simpler for all senders.
- new information request forms for the alerts for information exchanges between Member State authorities (IMI will automatically copy alert data into these new request forms, which will be directly linked to the corresponding alert in the system);
- information request forms for EPCs for information exchanges between Member State authorities (IMI will automatically copy alert data into these new request forms, which will be directly linked to the corresponding EPC application in the system);
- the search-result lists of alerts and EPC applications will be further improved (a new sorting feature for all columns and the possibility to hide columns in the default view).

4. Potential future improvements

The IMI Team has identified a set of potential future improvements based on user feedback and based on discussions of national IMI coordinators and Member States representatives in the group of coordinators for the recognition of professional qualifications. These potential improvements have to be further planned and incorporated in the work plans of the coming year(s). For technical and organisational reasons, developing and releasing any of the listed improvements to the alert mechanism requires appropriate implementation by all Member States of the currently available six alert modules.

The following potential improvements have already been identified:

- introducing new, specific alert modules for dentists, pharmacists, physiotherapists psychologists and social workers;
- connecting the alert mechanism with national databases for Member States, where relevant (subject to prior legal and technical analysis);
- further improving the IMI dashboard to provide easy access to predefined list of alerts and EPC applications (e.g. displaying only active alerts);
- further improving document management IMI functionalities for EPC to facilitate the work of the competent authorities.

The Commission will continue to collect feedback from IMI users and professionals and to add to the above list of potential technical improvements. Member States will be informed about developments planned for future improvements through the network of national IMI coordinators and the group of coordinators for the recognition of professional qualifications.

GENERAL CONCLUSIONS

In contacts with Member States and stakeholders, the Commission has always insisted on the importance of closely monitoring how the competent authorities have implemented the EPC and the alert mechanism. The Commission has also insisted on the importance of monitoring and evaluating how the EPC has been used by the professionals the EPC was intended to help. This staff working document is an important step in this continuous evaluation and monitoring.

As indicated in previous points, several expert meetings, a conference, a workshop and many bilateral exchanges have taken place. Together with the survey results, these events all helped to ensure that the initiatives are implemented in the most reasonable and effective way.

The statistics on the usage of the EPC (and the feedback received from professional organisations and competent authorities) confirmed that the initiatives meet the policy needs well, enhance further safe professional mobility, and provide added value compared to the 'traditional' recognition processes.

Analysis of the statistics and feedback of stakeholders also confirmed that the IMI system provides an effective and secure platform for handling professionals' applications, and that it is flexible enough to be developed further to cater to user needs.

It is equally important to highlight that neither the statistics, nor the feedback on EPC revealed any particular patient safety threats, especially concerning the three health professions concerned. Before the introduction of the EPC some stakeholders had voiced concerns about such threats.

Stakeholder feedback also confirmed that the alert mechanism strengthens cooperation for safe mobility. This initiative is therefore also serving its purpose. Nevertheless, we recognise the challenges Member States face in implementing this mechanism due to the differences in their national disciplinary and professional rules.

The Commission is committed to continue fine-tuning, within the existing frameworks, the EPC procedures and the relevant IMI features to further improve their functioning and the user experience. Stakeholder input is very valuable in helping the Commission perform this work. It is therefore important to continue working together and remain in dialogues. This is the best way to tackle new implementation challenges and make the most of both the EPC and the alert mechanism.

The Commission is also ready to assist stakeholders with their implementation difficulties. In this context, the Commission is also analysing how to improve the existing legal and technical guidance and how to improve even further transparency to make sure that guidance is available for all stakeholders.

ANNEX

Questions from the 'Survey on the experiences with the European Professional Card and the Alert Mechanism procedures (EN)'

Objectives and general information

Introduction

The **European Professional Card** (EPC) is an electronic procedure professionals can use to get their professional qualifications recognised in another EU country. This procedure, supported by the Internal Market Information System (IMI), makes the recognition of qualifications faster and less burdensome.

It is fully electronic recognition procedure, and more transparent than the traditional paper based processes: professionals can get informed and start their application through the Your Europe web portal (http://europa.eu/youreurope/epc). They can keep track of their application on-line and re-use already uploaded documents to start new applications for different countries. Professionals can apply for an EPC for the purposes of permanent establishment in another Member State or for temporary and occasional service provision there.

The recognition procedure under the EPC also builds on the strong cooperation between national competent authorities in the professionals' home and host countries. The professional always applies for the EPC, through IMI, to her home Member State (the country where she is established or where she obtained her relevant professional qualification). The file will be forwarded electronically to the host Member State which issues the EPC. In case of temporary and occasional mobility without prior check of qualifications, it is the home Member State itself that issues the EPC.

From 18th January 2016 the European Professional Card (EPC) has been available for general care nurses, physiotherapists, pharmacists, real estate agents and mountain guides.

To ensure that EU patients and consumers are adequately protected, the Commission also introduced an **Alert Mechanism**. EU countries accordingly are required to quickly warn each other through IMI concerning professionals: in the health and education of minors sectors who have been prohibited or restricted from practicing the profession in one country; have used falsified diplomas for their application for the recognition of their qualification.

This consultation aims to gather views on the usage of both initiatives more than a year after their launch. The results of this public consultation will be without prejudice to potential actions that the Commission may wish to take in the future.

The results of this consultation will be published, including the individual responses provided, should the respondents have agreed to publicly disclose their contributions. You are invited to read the privacy statement attached to this consultation for information on how your personal data and contribution will be dealt with.

This public consultation will close on **3rd May 2017**.

This questionnaire is divided into **different sections which are not dependent on one another**. In light of their interest and experience respondents can choose to reply to one or several sections of this questionnaire.

Section A shall be completed by all respondents (information on the respondent).

- Section B targets public authorities who are involved in the national implementation of the EPC for the five professions that are currently covered by the procedure

- Section C targets professional organisations representing any of the five EPC professions.

- Section D targets public authorities who are involved in the implementation of the alert mechanism

Please select the section(s) of interest to you after completing Section A.

Thank you for taking the time to respond to this consultation.

Fields marked with * are mandatory

Section A - Information on the respondent

Section A

A1. Please indicate in which capacity you are responding to this questionnaire:

- Public authority
- Professional organisation

What kind of professional organisation?

- National professional organisation representing one or more of the professions covered by the EPC
- European organisation representing one or more of the professions covered by the EPC
- International organisation representing one or more of the professions covered by the EPC

Please specify:

What kind of public authority?

- National competent authority responsible for the implementation of the European Professional Card (e.g. a national competent authority responsible for handling EPC applications, or a coordinating authority in this context)

- National competent authority responsible for the implementation of the alert mechanism procedures (e.g. a national competent authority responsible for sending or receiving alert or a coordinating authority in this context)
- National Coordinator responsible for the recognition of professional qualifications
- National IMI coordinator
- Assistance centre under the Professional Qualifications Directive

A2. Please indicate the country(ies) your public authority or professional organisation represents:

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czech Republic
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Ireland
- Italy
- Latvia
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Poland
- Portugal
- Romania
- Slovak Republic
- Slovenia
- Spain
- Sweden
- United Kingdom
- Country from EEA/EFTA
- Covering all EU28
- International

A3. Please give us the name of your organisation and your address (seat).

A4. Please provide us the email address of your organisation.

A5. Should we have further questions on the opinions you express, do you give permission for us to contact you?

Yes / No

A6. Are you registered in the Interest Transparency Register?

Please note that if your public authority/professional organisation is not registered in the Transparency register, we will consider and publish your response separately.

The transparency register may be found here: Transparency Register. Through this website you might also complete your registration, should you wish to register no.

Yes / No

If yes, please indicate your registration number

A7. Publication of results

Received contributions may be published on the Commission's website, with the identity of the respondent. Please state your preference with regard to the publication of your contribution. Please note that regardless of the option chosen, your contribution may be subject to a request for access to documents under Regulation 1049/2001 on public access to European Parliament, Council and Commission documents. In this case the request will be assessed against the conditions set out in the Regulation and in accordance with applicable data protection rules)

- My contribution may be published under the name indicated; I declare that none of it is subject to copyright restrictions that prevent publication
- My contribution may be published but should be kept anonymous; I declare that none of it is subject to copyright restrictions that prevent publication
- I do not agree that my contribution will be published at all

A8. Which section(s) of this consultation do you want to reply to?

- Section B - targeting public authorities who are involved in the national implementations of the EPC for the five professions that are currently covered by the procedure
- Section C - targeting professional organisations representing any of the five EPC professions

- Section D - targeting public authorities who are involved in the application of the alert mechanism.
- Section B - Public authorities' experience with the EPC

Section B

B1. For which of the following professions is your authority responsible for?

Should your authority be responsible for more than one of the EPC professions and should your answers for the following questions differ for these professions please reply concerning the profession on which you gained the most experience. Please provide additional details and explanations on the differences at the end of this questionnaire.

- My authority is an EPC competent authority for Nurses responsible for general care
- My authority is an EPC competent authority for Pharmacists
- My authority is an EPC competent authority for Physiotherapist
- My authority is an EPC competent authority for Real estate agents
- My authority is an EPC competent authority for Mountain guides
- My authority acts as National coordinator for the recognition of professional qualifications
- My authority acts as an Assistance Centre under the Professional Qualifications Directive
- My authority acts as National IMI Coordinator (NIMIC)
- None of these

B2. Has your authority already dealt with professionals' applications for an EPC as a home Member State?

Please note that in the context of the EPC procedures the home Member State is the country where the professional is established. In case the professional is not established in any Member States at the moment of application, then the home Member State is the Member State where the professional obtained the relevant professional qualification.

Yes / No

If yes, how many applications in total?

B3. Has your authority already dealt with professionals' applications for an EPC as a host Member State?

Please note that under the EPC procedures the host Member State indicates the Member States where the professional wishes to get established or provide temporary services.

Yes / No

If yes, how many applications in total?

B4. Please rank from 0 to 5 how well in your view the European Professional Card procedure, implemented through the Internal Market Information System, delivers the following benefits.

(0) does not deliver any benefit, (1) poorly, (2) fairly, (3) well, (4) very well, and (5) excellently

	0	1	2	3	4	5	I do not know
Providing a structured procedure with clear steps to follow							
Speeding up the processing of applications (compared to "traditional" recognition procedures)							
Setting clear deadlines							
Facilitating communication with the applicants							
Facilitating communication with your counterparts in other Member States							
Contributing to overcome language barriers							
Providing a reliable and secure mean of exchange of information							
Clarifying the maximum list of national documents (including translations and certified copies) that authorities can request in support of an EPC application							
Enhancing transparency on national document requirements and fees both for professionals and national competent authorities							

Please feel free to add any additional comments if necessary:

B5. Based on your overall experience have you found the EPC IMI module easy to use?

- o Yes, it is very intuitive and easy to use.
- o I had some difficulties, but was satisfied with the overall experience.

- No, I don't find it easy to use.
- I don't know.

Should you have experienced difficulties, or found it not easy to use, please explain why.

B6. Based on your experience have you found it easy to notify your document and fee requirements to the EPC repository?

- Yes, it is very intuitive and easy to use.
- I had some difficulties, but was satisfied with the overall experience.
- No, I don't find it easy to use.
- I don't know.

Should you have experienced difficulties, or found it not easy to use, please explain why.

B7. Based on your experience have you found it easy to consult other Member States' document requirements in the EPC repository?

- Yes, it is very intuitive and easy to use.
- I had some difficulties, but was satisfied with the overall experience.
- No, I don't find it easy to use.
- I don't know.

Should you have experienced difficulties, or found it not easy to use, please explain why.

B8. Do you find the available user guide and legal guidance useful when processing EPC applications/completing notifications to the EPC repository?

- Yes, they are clear and useful both from a technical and from a legal point of view.
- Yes, but more clarity would be needed from the legal side.
- Yes, but more clarity would be needed from the technical (IT) side.
- No, I don't find the available guidance useful.
- I am not aware of these guidance documents.
- I don't know.

B9. Please evaluate the ease of use of the following functions of the EPC IMI module.

(1) poor, (2) fair, (3) good, (4) very good and (5) excellent

	0	1	2	3	4	5	I do not know
Create and send request for information/missing documents							
Communicating with other authorities							
Communicating with a professional							

Respond to a request							
Choice of predefined questions/answers							
Dashboard							
Email notifications received on the status change of an application							
Encoding national decisions into the IMI (including decisions on approval, rejection, compensation measures, additional deadlines)							
Automatic translations							
Timer for tacit recognition							
Accepting a new EPC application							
Suspending or revoking an issued EPC certificate							

Please feel free to add any additional comments if necessary.

B10. Should your authority apply fees for handling EPC applications, do you thoroughly analyse the actual costs involved?

- Yes, we carry out such analysis.
- No, the fees are set out by legislation and are not linked to actual costs.
- My authority does not require fees for handling EPC applications.

If yes, please provide more information on how you carried out such analysis.

B11. Should your authority apply fees for handling EPC applications as a home Member State, how do these EPC fees correspond to the fees of the traditional recognition procedures?

- EPC fees are lower than fees of the traditional procedures.
- EPC fees are higher than the traditional procedures.
- The fees of the EPC and traditional procedures are the same.
- My authority does not require fees for handling EPC applications.

B12. Should your authority apply fees for handling EPC applications as a host Member State, how do these EPC fees correspond to the fees of the traditional recognition procedures?

- EPC fees are lower than fees of the traditional procedures.

- EPC fees are higher than the traditional procedures.
- The fees of the EPC and traditional procedures are the same.
- My authority does not require fees for handling EPC applications.

B13. Does your authority accept certain documents in different languages than the official/administrative language of your Member State?

Yes / No

If yes, please provide a list of the documents (document categories) that you accept in other languages too.

B14. In view of the experiences of the first year of the EPC procedure , does your authority plan to revise its requirements on fees/documents (including certified copies and translations)?

Yes / No

If yes, please provide more information on your planned reforms.

B15. In your experience has the EPC procedure also helped in creating a stronger network of the relevant competent authorities?

- Yes, I have now closer contacts with my counterparts in other Member states, and also with other competent authorities within my own Member State.
- Yes, I have now closer contacts with my counterparts in other Member States.
- Yes, I have now closer contact with other competent authorities within my own Member State.
- No, I did not develop any new relations or improved existing ones despite that I handle EPC applications regularly.
- I don't know.

B16. Who would you turn to if you needed help with using the EPC IMI module?

- I do not know who to contact.
- I would contact my National IMI Coordinator.
- I would contact my National coordinator for the Recognition of Professional Qualifications.
- I would contact for advice other competent authorities in my Member State.
- I would contact the IMI helpdesk or other Commission services.

B17. General remarks

Should you feel to do so, please provide any general remarks or suggestions (respecting the applicable legal framework) either on the EPC procedure or the IMI EPC module. Please also explain here the differences you might experienced concerning the different professions your authority is responsible for.

B18. Documents

You might also upload any additional document or position paper that you find relevant.

Thank you for taking your time to respond to this Section.

Section C - Professional organisations' experience with the EPC

Section C

C1. Which of the following professions does your organisation represent?

- ☐ Nurses responsible for general care
- ☐ Pharmacists
- ☐ Physiotherapist
- ☐ Real estate agents
- ☐ Mountain guides
- ☐ None of these

C2. How often are you contacted by your members on issues concerning the European Professional Card?

- o I have never been contacted
- o I receive questions frequently (at least weekly).
- o I receive questions regularly (at least monthly).
- o I receive questions occasionally.

C3. Do you provide information on the EPC for your members on your website/through your communication activities?

- ☐ Yes, we provide information on our website.
- ☐ Yes, we provide information on our website (also pointing to the relevant section of the Your Europe website).
- ☐ Yes, we communicated on it by other means (newsletters, flyers, conferences etc).
- ☐ No, we do not communicate in any form on the EPC.

Please provide us with the link to your website if possible:

C4. Overall how would you assess the feedback you received from your members on the EPC procedure?

- ☐ I received only positive feedback from my Members.
- ☐ I received mostly positive feedback from my Members.
- ☐ I received both positive and negative feedback from my Members.
- ☐ I received mostly negative feedback from my Members.
- ☐ I received only negative feedback from my Members.
- ☐ I did not receive any feedback from my Members.

C5. On the basis of the feedback of your Members, how would you assess their appreciation of the following features?

(1) poor, (2) fair, (3) good, (4) very good and (5) excellent

	0	1	2	3	4	5	I do not know
General information on the EPC provided through the dedicated EPC website (http://europa.eu/youreurope/epc)							
Reliability of the information provided on the expected document requirements and fees (through the simulator of the dedicated EPC website)							
Ease of use of the online platform for EPC applications							
Ease of the communication with the relevant competent authorities through the online platform							
Respect of the applicable deadlines by the relevant competent authorities throughout the EPC procedure							

Please feel free to add any additional comments if necessary.

C6. On the basis of the feedback of your Members, what did they consider as advantageous features of the EPC procedure, compared to the traditional recognition procedures?

- ☐ The professional knew the document requirements and the expected fees in advance.
- ☐ The procedural steps were clear.
- ☐ It was easy for professionals creating their profile and submitting their EPC application(s).
- ☐ The professional could reuse his valid supporting documents for further EPC applications.
- ☐ It was easy to contact the relevant competent authorities electronically.

- It was easy to keep track of the application: the procedure was transparent.
- The EPC certificate could be generated by the system directly.
- The professional obtained the EPC quicker than the traditional recognition procedures would have been.
- The professional could get support from its National Assistance Centre throughout the Procedure.
- The validity of an EPC certificate could be checked by the potential employers/clients/chambers online.
- Others

If you selected "others", please specify.

C7. Should your Members have expressed some concerns on the EPC procedure, which were these?

- National authorities imposed heavier document requirements, including the need for submitting translations or certified copies, than what they indicated initially.
- Fees of the procedure.
- Additional steps needed to be completed by the professional (language checks, registration with professional bodies or chambers etc.) before he could start practicing his profession in the host Member State.
- The home Member State did not process the application timely.
- Difficult to get support during the applications from the national Assistant Centres.
- Others

If you selected "others", please specify.

C8. General remarks

Should you feel to do so, please provide any general remarks or suggestions (respecting the applicable legal framework) either on the EPC procedure or the IMI EPC module. Please also explain here the differences you might experienced concerning the different professions your authority is responsible for.

C9. Documents

You might also upload any additional document or position paper that you find relevant.

Thank you for taking your time to respond to this Section.

Section D - Public authorities' experience with the alert mechanism

Section D

D1. For which of the following IMI alert modules is your authority competent?

- ☐ Prohibition/restriction of doctors
- ☐ Prohibition/restriction of nurses
- ☐ Prohibition/restriction of veterinary professions
- ☐ Prohibition/restriction of other health professions
- ☐ Prohibition/restriction of professions concerning the education of minors
- ☐ Falsified diplomas
- ☐ My authority acts as National IMI Coordinator (NIMIC)
- ☐ My authority acts as National coordinator for the recognition of professional qualifications
- ☐ My authority acts as an assistant centre under the Professional Qualifications Directive
- ☐ None of these

D2. Has your authority already sent alerts by using the relevant IMI module?

Yes / No

If yes, in how many cases?

D3. Has your authority already received alerts through the relevant IMI module?

Yes / No

If yes, in how many cases?

D4. If your authority already received alert(s) through the relevant IMI module, did they concern professionals who were already registered or had applied for recognition in your Member State?

Yes / No

Please provide us with more information on how do you follow up on the relevant alerts within your authority?

D5. How well do you think the alert mechanism, implemented through the Internal Market Information System, delivers the following benefits?

(1) poorly, (2) fairly, (3) well, (4) very well and (5) excellently

	0	1	2	3	4	5	I do not know
Contributing to a stronger cooperation between national authorities concerned with the free movement of professionals							
Ensuring the safe mobility of professionals within Europe							
Creating a quick warning mechanism between national competent authorities							
Providing the necessary data protection safeguards							
Contributing to overcome language barriers							
Providing a reliable and secure means of communication							
Strengthening mutual trust amongst national competent authorities and in the mutual recognition mechanism							
Allowing national authorities to search amongst all the valid alerts they have sent or received							

Please feel free to add any additional comments if necessary.

D6. Based on your overall experience have you found alert mechanism IMI module easy to use?

- Yes, it is very intuitive and easy to use.
- I had some difficulties, but was satisfied with the overall experience.
- No, I don't find it easy to use.
- I don't know.

Should you have experienced difficulties, or found it not easy to use, please explain why

D7. Based on your experience, do you find it useful to share information between Member States within the Group of Coordinators on the different national implementations of the alert mechanism?

- Yes, I find the current information exchange useful within the Group of Coordinators. I understand better now what kind of national sanctions are behind the alerts sent by other Member States.
- I do not find such exchanges useful or necessary.
- I am not aware of the current discussions that take place within the Group of Coordinators.

D8. Please evaluate the ease of use of the following functions of the PQ alert module in IMI.

(1) poor, (2) fair, (3) good, (4) very good and (5) excellent

	0	1	2	3	4	5	I do not know
Create and send alerts							
Dashboard							
Following up on alerts using the 'Request' for information exchange							
Email notifications concerning the alerts							
Searching for/amongst alerts							
Automatic translations							
Withdrawal and closure of alerts							

D9. General remarks

Should you feel to do so, please provide any general remarks or suggestions (respecting the applicable legal framework) either on the EPC procedure or the IMI EPC module. Please also explain here the differences you might experienced concerning the different professions your authority is responsible for.

D10. Documents

You might also upload any additional document or position paper that you find relevant.

Thank you for taking your time to respond to this Section.