



NON-PAPER BY THE BENELUX UNION

Joint priorities of Belgium, the Netherlands and Luxembourg on the Skills Portability Initiative¹

Introduction

The Benelux Union, an intergovernmental organisation bringing together Belgium, the Netherlands and Luxembourg, has placed cross-border mobility at the heart of its action, as a key driver of economic integration and the free movement of persons and services. In the context of sectoral changes, demographic shifts, and persistent labour and skills shortages across the EU, recognising qualifications and skills effectively is a strategic priority for competitiveness, social cohesion, and the green and digital transitions.

The Benelux Union welcomes the upcoming European Commission's Skills Portability Initiative. Actively engaged in the recognition of professional qualifications among themselves and with other EU Member States, the Benelux countries view this initiative as a timely opportunity to further advance their efforts. In the context of renewed calls for greater European competitiveness and deeper integration of the EU internal market, as highlighted in the reports by Mario Draghi and Enrico Letta, this initiative appears as an opportunity to modernise existing frameworks, remove unnecessary administrative barriers, and ensure that skills and qualifications are effectively recognised and fully utilised across borders, while maintaining quality standards and thereby strengthening mutual trust.

Close to 23% of all cross-border workers in the EU live in the Benelux countries and their neighbouring regions². As a result, border regions therefore risk missing significant economic and social opportunities if they fail to harness the full potential of cross-border labour markets. To stimulate cross-border mobility, coordinated support from the relevant ministries of neighbouring countries is indispensable for local and regional actors in border areas.

¹ Please note that possible projects mentioned in this non-paper which would imply working out or modifying (existing) legislation would always need the involvement and approval of the competent national administrations responsible for the recognition of professional qualifications.

² More than 400,000 of the 1.9 million cross-border workers in the European Union live in the Benelux+ area (Benelux countries and neighbouring regions in France and Germany) according to data compiled by the Secretariat General of the Benelux Union from the European Commission, IBA-OIE, INAMI and INSEE.

At the same time, a coherent, well-coordinated and effective European policy is essential, and the Benelux countries support the European Commission's efforts under the upcoming Skills Portability Initiative. They also stress the importance of allowing room for innovation and adaptation - where relevant and beneficial - to specific cross-border situation, particularly within regional cooperation frameworks such as the Benelux Union.

Concerning (higher) education, new initiatives should be fully coherent with existing European Higher Education Area (EHEA) instruments, notably the European Standards and Guidelines (ESG), the European Approach to Cross-border Quality Assurance (EA), Qualifications Framework (EHEA-QF), and the Lisbon Recognition Convention (LRC), as well as the Global Recognition Convention (GRC). Ensuring alignment with these frameworks is essential to guarantee transparency, trust, and the smooth recognition of both academic qualifications and qualifications giving access to regulated professions. The Multilateral Treaty on the Automatic Recognition of Higher Education Qualifications among the Benelux and Baltic countries represents a best practice that could be extended to the wider European region.

Action 1: Facilitate worker mobility through improved transparency of skills and qualifications, and digitalisation

The Benelux Union:

- **Welcomes and supports the European Commission's ambition**, under the upcoming Skills Portability Initiative, to facilitate worker mobility through greater transparency of skills and qualifications and enhanced digitalisation. Existing frameworks - such as the LRC, the GRC, Benelux cooperation in higher education, and also the European Qualification Framework (EQF) - already provide an important basis. The Benelux Union further calls upon the Commission to more explicitly differentiate between higher education and vocational education and training (VET), between diploma recognition and skills recognition, between regulated and non-regulated professions, and between formally and non-formally acquired skills. The Commission should take into account the existence of different portability regimes, depending on the type of qualifications or skills concerned.
- Underlines that a more **skills-oriented labour market** calls for the need of increasing transparency, transferability (between roles and sectors), recognition and trust in skills.
- Supports the **further development of centralised information**, such as the Your Europe platform, for skills transparency, integrating qualifications, micro-credentials and professional experience, and providing links to recognition procedures, competent authorities, and tailored guidance for regulated and non-regulated professions.
- Stresses the importance of stronger **links and interoperability between and with existing EU tools and systems**, notably Europass, national qualifications frameworks referenced to the EQF, and national skills languages that correspond with ESCO, ensuring that qualification information is systematically linked to skills taxonomies and includes micro-credentials, with sufficient tools to prevent fraud.
- Supports the **development of interoperable and verifiable digital credentials** for qualifications and professional skills - issued by recognised authorities, and easily shareable across borders - ensuring coherence with existing initiatives such as ESCO.
- Promotes strengthened **direct contacts and practical cooperation between competent actors and administrations**, building on best practices such as the Benelux Union's regional meetings

in sectors with high application volumes. In this context, the Benelux can serve as an **effective network of actors**, engaging stakeholders at all levels - from policymakers to qualification authorities and labour market representatives - and highlighting existing good practices, including cross-border regional projects that actively promote greater transparency of skills and qualifications.

Action 2: Facilitate, modernise and expand recognition processes for regulated professions (Directive 2005/36/EC)

The Benelux Union:

- Supports **targeted and proportionate amendments to Directive 2005/36/EC** to modernise recognition procedures for regulated professions, with a focus on increased use of digital procedures allowing for faster recognition procedures.
- Encourages, where possible, a **gradual extension of automatic recognition regimes**, including through common training frameworks and tests foreseen in Directive 2013/55/EU (amending Directive 2005/36/EC) but not yet implemented, particularly in professions facing acute labour shortages in strategic sectors or high cross-border mobility for instance through European pilot projects within the Benelux region and by exploring their application at Benelux level. In light of the experience gained at EU level, it would be assessed whether and to what extent further application at Benelux level would be appropriate.
- **Regarding the Internal Market Information (IMI) system**, the Benelux Union :
 - Calls for strengthened administrative cooperation through IMI, including improved exchanges of information and enhanced mutual learning among competent authorities.
 - Underlines the importance of ensuring timely and effective responses to requests submitted via IMI, in order to increase trust between administrations, with sufficient tools to prevent fraud.
 - Encourages the European Commission to continue its work on giving guidance to Member States on the proper use of the Alert Mechanism in IMI. Next to that, the possibility of interoperability of IMI with national systems/databases should be taken into consideration to make a more automated and user-friendly treatment of alerts possible for competent authorities.
- Invites the European Commission to further encourage the use of SOLVIT and to enhance its visibility across the European Union.

Action 3: Common rules to simplify procedures for the recognition of qualifications and skills of third-country nationals

The Benelux Union:

- Supports **greater transparency, at EU level, in establishing common procedural** rules for the recognition of third-country nationals' (TCN) professional qualifications, including clear timelines and transparent criteria.
- Encourages, at EU level, **early recognition and skills assessment** and takes into account the **challenges faced by Member States**, including difficulties with document authentication, language barriers, and the need to complement formal qualifications with skills-based

approaches. For professions where formal documentation is incomplete or unavailable, alternative assessment methods - such as skills tests, practical assessments, and validation of prior learning - are often in practice.

- Encourages **EU engagement with priority third countries** to enhance the authenticity, transparency, and trustworthiness of professional qualifications, in line with the principles of mutual trust and transparency arising from Directive 2005/36/EC, in case of regulated professions. With regard to the recognition of higher education qualifications, the Benelux Union also underlines the importance of relying on principles established in the LRC and the GRC.
- Stresses that **any new EU-framework should be fully coherent with existing EU migration instruments**, including the EU Talent Pool, the Blue Card Directive, and sector-specific initiatives, when attracting TCN with skills needed for strategic sectors, while respecting national rules regarding labour market admissions.

Conclusion

The Benelux countries support the European Commission's efforts to enhance the transparency of skills and facilitate the mobility of skilled workers across Europe - an essential step towards a more integrated and competitive internal market. Particular emphasis should be placed on what is already being advanced, or could further be achieved, at EU level to ensure coherent and effective solutions across Member States.

This objective is fully coherent with the Benelux Union's focus on the further development of its internal market and economic union, as set out in the 2008 Benelux Union Treaty, and with the priorities and lines of action as set out in its multiannual work programme 2025-2028 and its successive annual plans. In this context, the Benelux seeks to complement and support EU-level initiatives by contributing to stronger cross-border cooperation at all levels, in line with Article 2 of the Benelux Union Treaty.

Where necessary and of added value, the Benelux Union stands ready to play a pioneering role within the European Union - testing innovative approaches, helping to remove unnecessary barriers to labour mobility, and further strengthening mutual trust in each other's skills and (professional) qualifications. In doing so, the common Benelux priorities aim to support and contribute concretely to the broader objectives pursued at EU level.

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