

## Public Consultation on the EU Skills Portability Initiative:

### Action 1, 2 & 3

#### Response by the European Federation of Geologists (EFG)

February 2026

## 1. Introduction and Political Context

The European Federation of Geologists (EFG) welcomes the Skills Portability Initiative launched by the European Commission and strongly endorses its aims to promote labour mobility, enhance skills transparency, and reinforce the effective functioning of the EU Single Market.

Geologists play a pivotal role in supporting Europe's green, digital, and industrial transitions, including the implementation of key EU policies on critical raw materials, net-zero technologies, climate adaptation, and environmental protection. Through their work, they make a direct contribution to European competitiveness, innovation, and sustainable development.

EFG's objectives and activities are fully aligned with the Commission's 2024–2029 political guidelines, the Union of Skills, and the priorities highlighted in the Letta and Draghi reports, which underline the importance of making skills transparent, portable, and reliable across borders. EFG also supports the principles of the European Pillar of Social Rights and the European approach to micro-credentials.

Given the inherent mobility requirements of the geology profession, EFG regards the Skills Portability Initiative as a key instrument for unlocking the full potential of highly qualified professionals in Europe and for addressing persistent labour and skills shortages in strategic sectors.

## 2. Evidence of Barriers to Skills Portability in the Geology Profession

### 2.1 High Mobility and Skills Shortages

Geology is intrinsically characterised by a high degree of professional mobility. According to the 2024 Employment Survey conducted by the European Federation of Geologists, 22% of respondents relocate within a four-year period, with 22% moving within the European Union and 29% pursuing international mobility. These mobility requirements are expected to intensify further in response to skills shortages, demographic developments, and increasing demand in sectors that are critical to Europe's strategic autonomy.

Nevertheless, persistent regulatory, administrative, and structural barriers continue to constrain effective professional mobility and the optimal deployment of skills across Member States.

### 2.2 Limited Recognition and Transparency of Qualifications

Geologists are not covered by the system of automatic recognition established under Directive 2005/36/EC and are therefore required to rely on the general system for the recognition of professional qualifications. This framework is frequently characterised by lengthy processing times, substantial financial costs, and significant administrative complexity. In practice:

- Recognition procedures differ considerably among Member States;

- Employers and competent authorities often display limited confidence in geology qualifications obtained in other jurisdictions;
- Early-career professionals and recent graduates face restricted access to clear, efficient, and predictable recognition pathways.

These constraints reflect broader structural challenges identified by the European Commission, notably the uneven implementation of transparency instruments and the insufficient level of trust in cross-border qualifications, which continue to hinder effective labour mobility within the Single Market.

### **2.3 Fragmented Regulation and Quality Assurance**

Across the EU, geology is regulated in certain Member States but remains unregulated in others. Where oversight is absent, unqualified individuals can work as geologists, creating threats to safety, environmental stewardship, and professional standards.

Such inconsistencies weaken confidence between national systems and limit the success of EU mobility initiatives.

### **2.4 Limited Digitalisation of Professional Credentials**

Despite the availability of voluntary digital instruments, professional qualifications in geology continue to be predominantly paper-based or dispersed among national systems. They are not systematically linked to EU platforms such as Europass, the European Learning Model, or emerging EU digital identity frameworks.

As a result, interoperability remains limited, administrative procedures are more burdensome, and employers encounter challenges in reliably and efficiently verifying skills and qualifications.

### **2.5 Administrative Barriers for Mobile Professionals**

Geologists engaged in cross-border commuting, project-based work, or short-term contracts face additional challenges related to taxation, social security coordination, and administrative compliance. These barriers discourage mobility and reduce labour market efficiency.

## **3. Relevance to the Objectives of the Skills Portability Initiative**

The experiences of geology professionals clearly demonstrate the urgent challenges that the Initiative must address, including inadequate transparency and comparability of qualifications, weak digitalisation and poor interoperability of credentials, slow and fragmented recognition procedures, and the persistent under-recognition of skills gained through professional experience and lifelong learning.

These systemic shortcomings directly contribute to skills mismatches, recruitment bottlenecks, and declining competitiveness, particularly in strategic sectors that are essential for delivering the EU's green and digital transitions. Without decisive action, these barriers will continue to undermine workforce mobility and economic resilience.

EFG therefore strongly endorses the Initiative as a critical and timely instrument to empower workers, support employers, and strengthen Europe's long-term competitiveness and strategic autonomy.

## **4. EFG Recommendations**

## Action 1

### **EFG Recommendations for Facilitating Worker Mobility through Skills Transparency and Digitalisation of the Skills Portability Initiative**

EFG strongly supports Action 1 (Facilitating worker mobility through skills transparency and digitalisation) and considers it foundational for improving labour mobility in regulated and science-intensive professions.

#### **Key challenges for geologists**

- Employers and authorities often lack trust in foreign qualifications.
- Qualifications, professional experience, and continuing professional development are not consistently visible or comparable across borders.
- Digital credential systems remain fragmented and poorly interoperable.

#### **EFG recommendations**

- Ensure that qualifications and professional credentials are systematically referenced to National Qualifications Frameworks (NQFs) and the European Qualifications Framework (EQF), with up-to-date data made available through EU platforms.
- Promote interoperable digital credentials for qualifications, recognition outcomes, professional certifications, and lifelong learning, aligned with the European Learning Model and usable via the EU Digital Identity Wallet.
- Enable professionals to digitally share verified credentials with employers and authorities, reducing administrative burden and fraud risks.
- Ensure that micro-credentials, continuing professional development, and validated non-formal and informal learning are visible, comparable, and portable across Member States.

EFG's European Geologist (EurGeol) Register and Expert Database already operate on harmonised competence standards and could contribute to piloting interoperable digital solutions under Action 1.

## Action 2

### **EFG Recommendations for Modernising and Expanding Recognition Processes for Regulated Professions**

EFG welcomes Action 2 (Modernising and expanding recognition processes for regulated professions) and considers it essential for ensuring fair, predictable, and effective mobility for geologists.

#### **Key challenges for geologists**

- Geology is not included in automatic recognition under Directive 2005/36/EC.
- The general recognition system is often lengthy, costly, and unpredictable.

- Fragmented regulation across Member States undermines mutual trust and creates risks of unfair competition and unqualified practice.

### **EFG recommendations**

- Extend automatic recognition mechanisms under Directive 2005/36/EC to additional professions, including geology, notably through delegated acts.
- Support the development of a Common Training Framework (CTF) for geology, building on EQF-aligned learning outcomes previously developed through EU-funded initiatives such as EuroAges.
- Digitalise and simplify recognition procedures, including applications, assessments, and decisions, to reduce administrative burdens for professionals, employers, and authorities.
- Recognise trusted European professional certifications, such as EurGeol, as complementary tools that support transparency, quality assurance, ethical standards, and continuous professional development.

Such measures would significantly improve predictability, reduce processing times, and strengthen trust in cross-border professional mobility.

## **Action 3**

### **EFG Recommendations for Simplifying Recognition of Qualifications and Skills of Third-Country Nationals**

EFG supports Action 3 (Simplifying recognition of qualifications and skills of third-country nationals) and recognises its importance for addressing labour and skills shortages in strategic sectors.

### **Key challenges**

- Recognition of third-country qualifications remains fragmented, complex, and slow.
- Highly skilled professionals face delays that limit their contribution to EU labour markets, research, and innovation.
- Employers struggle to assess third-country qualifications in the absence of trusted reference frameworks.

### **EFG recommendations**

- Establish clear EU-level rules for recognition of third-country qualifications, including transparent procedures, clear deadlines, and digital workflows.
- Promote EU-level comparison of third-country qualification frameworks with the EQF, particularly for priority regulated professions.
- Allow pragmatic solutions such as temporary access to employment under supervision while recognition procedures are pending, where appropriate.
- Consider using established European professional certifications, such as EurGeol, as reference benchmarks for assessing professional competence and experience.

Balanced and efficient recognition mechanisms would support EU competitiveness while maintaining high professional and ethical standards.

## **5. Subsidiarity, Added Value of EU Action and Expected Impacts**

EFG strongly concurs that Member States acting independently would face difficulties in effectively addressing the identified barriers. Skills portability in geology relies on cross-border interoperability, mutual trust in qualifications, harmonised digital standards, and coordinated recognition procedures.

Only action at EU level can ensure coherence, prevent fragmentation, and deliver economies of scale. In the absence of coordinated intervention, national approaches will continue to diverge, increasing costs and restricting mobility.

EU involvement in this area is therefore fully justified under Articles 46, 53, and 114 TFEU and aligns with the principles of subsidiarity and proportionality.

The proposed measures are expected to deliver substantial benefits, including improved mobility of highly skilled professionals, better alignment between skills and labour market needs, reduced recruitment costs for employers and SMEs, stronger professional standards and public confidence, and enhanced contributions to the green and digital transitions. In addition, digitalisation would reduce paperwork and administrative travel, generating positive environmental impacts.

## 6. Role of EFG in Implementation

EFG stands ready to play an active and constructive role in implementing this Action of the Skills Portability Initiative, particularly in modernising and strengthening recognition systems for regulated professions. This commitment is demonstrated through:

- The development and maintenance of robust competence frameworks for geology;
- The operation of the EurGeol Register and Expert Databases;
- Targeted lifelong learning and upskilling programmes delivered by the EFG Academy;
- Ongoing collaboration with national authorities and EU institutions.



Drawing on its strong track record in quality assurance, professional accreditation, and cross-border cooperation, EFG is prepared to support pilot projects and contribute directly to the development and dissemination of best practices.

## 7. Conclusion

The geology profession illustrates both the strong potential and the current constraints of skills portability within the European Union. While professional mobility is high, recognition frameworks remain fragmented, digitalisation is limited, and standards are inconsistently applied across Member States.

By advancing transparency measures, formalising robust certification systems, and accelerating interoperable digital credential development, the Skills Portability Initiative can significantly boost labour mobility and strengthen competitiveness in this strategically vital sector.

The European Federation of Geologists fully endorses the Initiative and is committed to close collaboration with the European Commission and Member States to ensure its effective, coherent, and timely implementation

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### About EFG:



The European Federation of Geologists (EFG) is the largest and most influential network of geoscience professionals across the Council of Europe countries, with 28 national associations representing a direct membership of approximately 50,000 individuals. EFG collaborates extensively with leading geoscience organisations worldwide, including in Australia, the USA, Canada and South Africa, indirectly reaching over 150,000 experts.