



To:
Dr Marek Vink
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Brussels, 8 May 2015

Subject: Recognition of third country diplomas

Dear Dr Marek Vink, President of the Estonian Dental Association

It was with great concern that I heard about the initiative of the Estonian Health Board - Terviseamet to lower standards for the recognition of third country diplomas of healthcare professionals from third countries, namely requirements related to professional experience and language knowledge. Particularly since this initial recognition by Estonian competent authorities could not only unbalance Estonian dentistry but also have a severe impact on the EU internal market. Downgrading these requirements could lead to uncertainties and mistrust by other Member States in case these professionals wished to migrate within the EU after three years of professional practice, creating unnecessary difficulties in dentistry.

As President of the Council of European Dentists (CED)¹, I strongly support the endeavour of the Estonian Dental Association of maintaining these requirements to guarantee patient safety, protect public health and to enhance trust among competent authorities.

The provision of healthcare services, in particular oral health, require highly qualified and skilled professionals that can keep abreast professional development and maintain a safe and effective practice. When there is no coordination/harmonisation of the minimum training requirements to access to a profession (i.e. study programme, duration, traineeship), or either the possibility to control the quality of these requirements in a third country, the only assurance for Member States is the number of years of professional experience. **For this reason, the number of years of professional experience cannot be downgraded to allow faster recognition of professional qualifications.**

In addition, the obligation for professionals to have the necessary language knowledge to practice the profession in the host Member State (Estonia) is essential and justified for reasons of patient safety. Healthcare professionals should be able to communicate with their patients in a proper way (to obtain informed consent, to inform them about the procedure

¹ Council of European Dentists (CED) is the representative organisation for the dental profession in the EU, representing over 340,000 practising dentists through 32 national dental associations and chambers from 30 European countries. Established in 1961 to advise the European Commission on matters related to the dental profession, the CED promotes high standards of oral healthcare and effective patient-safety centred professional practice across Europe and contributes to safeguarding the protection of public health..

and risks, to explain treatment options, etc.) and understand fully the information given by the patients. They should also be able to communicate with their colleagues (in order to work in a hospital environment or to carry out surgeries), their employer (to follow-up instructions, etc.) and competent authorities (to understand professional rules, codes of conduct, national legislation, etc.). Misinterpretation in healthcare can lead to fatal errors. **Hence, the official knowledge of the host Member State language and respective control by competent authorities for professions with patient safety implications are required.**

The latter requirement was clarified and strengthened due to numerous patients' complaints during the last revision of Directive 2005/36/EC on the recognition of professional qualifications². The knowledge of the language of the host Member State and the possibility to carry out controls can (and should indeed) be carried out in case of a serious and concrete doubt about the sufficiency of the professional's language knowledge, this before the professional has direct contact with patients (Article 53 of Directive 2005/36/EC).

And although Directive 2005/36/EC does not regulate the recognition of professional qualifications from third country nationals holding third-country diplomas, the principle that all recognition should respect in any case minimum training conditions established in Directive 2005/36/EC is established under recital 10 and enshrined throughout the Directive.

I do hope that the Estonian Health Board reconsiders its position of lowering national standards for the recognition of professional qualifications from third country nationals holding third-country diplomas. The CED firmly supports the Estonian Dental Association in advocating the application of the same stringent requirements for these diplomas and professionals in order to safeguard public interest and to guarantee patient safety and quality of care across the EU.

We remain at your disposal for any assistance you might require.

Yours sincerely,



Dr Wolfgang Doneus
CED President

CC:

Terviseamet - Estonian Health Board

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² [Directive 2005/36/EC of the European Parliament and of the Council of 7 September 2005 on the recognition of professional qualifications](#) as amended by Directive 2013/55/EU of the European Parliament and of the Council of 20 November 2013 amending Directive 2005/36/EC on the recognition of professional qualifications and Regulation (EU) No 1024/2012 on administrative cooperation through the Internal Market Information System ('the IMI Regulation').