

ENMCA response to the updated Implementing Act

16 March 2015

1. The European Network of Medical Competent Authorities (ENMCA) was first convened at the behest of the European Commission (EC) in spring 2010 and brings together organisations responsible for recognising medical qualifications under Directive 2013/55/EU. As doctors are one of the most mobile professions in Europe, ENMCA participants have significant experience with both the benefits and challenges of high levels of mobility and recognition procedures.

We call on the national Coordinators to vote against the Act proposed for written vote on 18 March and on the European Commission to separate the Implementing Act into two distinct pieces of legislation for the European professional card (EPC) and the IMI alert mechanism respectively.

This would allow for further scrutiny on the EPC without jeopardising the implementation of the alert mechanism by the January 2016 deadline.

2. Both the alert mechanism and the EPC need to be fit for purpose. Unfortunately the revised Implementing Act does not address the patient safety concerns ENMCA raised about the EPC part of the Act on 9 February.
3. The risks of an ill-drafted EPC text with the corresponding implications for patient safety are far greater than the political risk of delaying its adoption and implementation until the Act is fit for purpose.
4. Separating the EPC part of the Act and postponing its adoption would allow the Commission to address the gaps that were identified in our position of 9 February and give more time to roll out an operationally complex system that needs to work from the outset, without compromising patient safety.
5. We realise that doctors are not proposed to be in the first phase of implementation for the EPC. However, as the intention of the Commission is to extend the Act to the medical profession in a future phase, it is essential for the legislation not to undermine patient safety.

To discuss our position, please contact: [Nicola While](#), General Medical Council (+44 161 250 6954); [Alexander Jäkel](#), German Medical Association (+49 30 400 456-369); [Marie Colegrave-Juge](#), French Medical Council (+32 2 401 61 58) or visit the ENMCA [website](#) for more information.