

# Statement

## DGB views on the Skills Portability Initiative

**In addition to ETUC views on Skills Portability Initiative, the DGB explains its position on the proposal for a Skills Portability Initiative.**

DGB and its member unions have always considered the recognition of foreign qualifications to be important because recognition can provide a certain degree of protection against exploitation and poor working conditions - and because it also facilitates access to training. That is why we have been very committed to the Recognition Act in Germany, which since 2012 has included a legal right to recognition of foreign qualifications - for citizens of EU countries as well as for third-country nationals.

Nevertheless, the recognition of skills is only one part of a complex picture. For third-country nationals, significant problems relating to their residence status are particularly associated with access to good jobs. They do not enjoy the freedom of movement that EU citizens are entitled to. In their situation, obtaining a residence permit and recognition of their qualifications are intrinsically linked to their employment contract and must be taken into account in future instruments.

### On recognition of foreign qualifications

However, to ensure that the legal right on recognition of foreign qualifications can be better enforced, we have key demands (more detailed see our [position-paper on the recognition of foreign qualifications](#), only German):

- **Strengthen a culture of recognition:** As a country of immigration, Germany must improve its recognition of foreign qualifications so that immigrants have fair access to the labour market, with equal opportunities in training, employment, remuneration, and further education and training. Current recognition procedures are too bureaucratic, lengthy, and expensive. Qualifications must be recognized more quickly and transparently. Despite their professional skills, many immigrants work in low-paid jobs with poor working conditions. However, demographic change and a shortage of skilled workers require better use of existing qualifications. A culture of recognition in society, public authorities, and companies is therefore necessary. And that means: A culture of recognition in companies stands or falls with the willingness of employers to treat immigrant employees fairly and equally in all respects. Employers must therefore be held more accountable for supporting further training and language courses. Works councils and staff councils should be actively involved in the recognition process to communicate the equivalence of foreign qualifications and ensure fair treatment.

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- **Speed up and improve recognition procedures:** Recognition procedures take too long. The reasons for this in Germany are staff shortages in the relevant authorities, differing standards between federal states, and a lack of opportunities for upskilling measures. In addition, there have been more applications since 2023. All of this leads to long waiting times, meaning that immigrants often must work in poorly paid unskilled jobs. To improve this situation, we need more staff in the relevant authorities, and standardized recognition procedures, digital processing, acceptance of English-language documents and waiver of certifications, use of AI to speed up processes and create simple sample decisions. Above all, there is a need for clear and transparent responsibilities, e.g., one recognition authority per federal state and profession. However, automatic European recognition is not necessary. There are already numerous agreements between EU member states on the mutual recognition of qualifications. This also means that recognition procedures for EU citizens in Germany are overwhelmingly concluded with full equivalence of their qualifications. This also applies to the recognition of qualifications obtained in the context of regulated professions.
- **Mandatory funding and an expand of re- and upskilling opportunities:** Recognition procedures are often expensive, with costs for fees, translations, and document procurement. These financial hurdles and uncertain refinancing prospects lead to great uncertainty and high consulting costs. We call for mandatory, systematic, and transparent funding for these procedures. However, it is becoming increasingly rare for foreign qualifications to be deemed fully equivalent in recognition procedures. This is particularly common among immigrants from non-EU countries. Although retraining opportunities are needed to achieve full equivalence, there is a lack of suitable training opportunities and language courses, which leads to long waiting times. We propose that qualification programs be better tailored to the needs of participants and that cooperation between authorities, VET providers, and employers be improved. In addition, language acquisition must be promoted without restriction, as otherwise successful integration cannot take place.

Finally: if we had a **right to training**, it would be easier for those affected to access appropriate training measures and reliable advice and financial support (i.e. funding). Both employers and public authorities would be truly obliged to ensure that immigrants are given real opportunities to training if gaps in their qualifications are identified.

### **On Qualification Frameworks and other (digital) tools**

The Commission's proposal addresses a wide range of further measures. We would like to focus on three existing instruments:

- **National qualifications frameworks** play at the moment only a minor role in recognition procedures. However, we believe that there is greater potential for improvement in terms of recognition procedures if mapping and referencing in the framework of European Qualification Framework were improved, if member states made their National Qualification Frameworks more binding (as Austria has done, for example), if information about National and European Qualification Framework were easier and more accessible and if more public awareness and information about qualification frameworks were provided.
- In our view, linking ESCO and EQF is not particularly desirable. **ESCO** serves to classify occupations and is important for the labor market, not for educational qualification systems. However, the placement of job seekers and employees in border regions via the EURES platform could benefit from further improvements to the functionality of ESCO.
- The **validation and recognition of non-formal and informal learning** must be further improved and particularly quality assured to ensure greater permeability and better mobility in Europe. The implementation of the Council Recommendations of 20 December 2012 on the validation of non-formal and informal learning (2020/C 417/01) must be enforced by a Council decision.