

Subject: Response to the project report of the EU Commission on the adoption of a Common Training Framework for Physiotherapy in the EU

We, the undersigned, write to formally express our strong opposition to the adoption of a Common Training Framework for Physiotherapy in the EU as currently proposed.

While a Common Training Framework is a noble aim, the EU Commission's project report "Feasibility of Establishing a Common Training Framework for the Profession of Physiotherapist" of 13 June 2025 raises serious concerns among the professional associations of Member States, including but not limited to:

- **Potential risk to patient safety**

The professional qualifications Directive 2005/36/EC already allows for mobility of physiotherapists within the EU, EEA countries and Switzerland while at the same time protecting patient safety in that those not reaching the education level within the host EU Member State must undertake compensatory measures. This is of utmost relevance, especially in the EU landscape where physiotherapists are, as they should be according to their education, autonomous health professionals in some Member States. Allowing physiotherapists who are not educated to work autonomously to practise autonomously is a serious threat to patient safety. The duty of the Regulatory Authorities is to protect the public and automatic recognition at level 4 or 5 of the European Qualifications Framework (EQF) will reduce public protection in many Member States. Establishing a Common Training Framework at either level confirms the deep concerns that the Europe Region has been raising since this idea was first mooted; – it will lower the standard of physiotherapy across Europe and it is completely unacceptable.

The level of the survey was not of sufficient detail to determine the depth and duration of the commonalities and therefore feasibility cannot be accepted on such a shallow basis. The variation that exists within the content - both depth and duration - of physiotherapy programmes at EQF level 6 across Europe, including the presence or absence of autonomy and the range of supervised clinical placements, means that a Common Training Framework would still pose a risk to patient safety.

- **Lowering of educational standards of physiotherapy and quality of care in Europe**

The disparate education levels within Europe do not enable a Common Training Framework at this time and adopting what is currently proposed by the EU Commission would inevitably lead to a lowering of standards of the profession in Europe. Allowing lower non-university EQF levels for a shorter and "easier" way to practise physiotherapy might open the door for other Member States to reduce their existing model which would lead to an undermining of the educational standards of the profession and ultimately a diminishing of the standard and quality of Physiotherapy delivered to patients across Europe.

- **Risk of fragmentation of the profession**

Currently there are countries where extensive compensatory measures are applied to physiotherapists educated in other EU Member States applying to practise in that country. These Member States are not likely to accept a Common Training Framework where compensatory measures are no longer an option. This will lead to a fragmentation of the profession across Europe, with some Member States potentially applying the Common Training Framework and others still applying the general system.

In summary, the adoption of a Common Training Framework as it is currently proposed in the EU Commission's project report "Feasibility of Establishing a Common Training Framework for the Profession of Physiotherapist" of 13 June 2025, **may lead to increased patient risk, a decline in the quality of physiotherapy care, a lowering of national professional standards, and, over time, a potential reduction in both the recognition and educational standards in countries where these are currently high.**

The Europe Region of World Physiotherapy and the undersigned national organisations believe that prior to implementing a Common Training Framework, the first step is to raise the levels of physiotherapy education so that there is a uniformity to the minimum level throughout Europe. We are at the full disposal of the Member States to support them in this task.

We remain open, however, to collaborating with the European Commission and the representatives of the EEA countries in relation to the way forward from this report as long as the next steps by the Commission involve the following.

- (i) Regarding commonalities: an in-depth assessment to explore the extent, depth and duration of each of the perceived commonalities in the existing entry level programmes at EQF level 6 in the EU and the EEA should be undertaken to more accurately ascertain commonalities and feasibility
- (ii) Regarding compensatory measures: a comprehensive analysis should be carried out to identify the number of applications for the recognition of the title of physiotherapy received by each competent authority within the EU and EEA, what percentage of these need to undergo compensatory measures, and what are the main deficiencies that lead to the need for these compensatory measures.

Most respectfully,

On behalf of the undersigned national organisations.

Esther-Mary D'Arcy
Chairperson of the Europe Region of World Physiotherapy



EU Physiotherapy organisations:

Austria	Physio Austria
Belgium	AXXON, Physical Therapy in Belgium
Bulgaria	Bulgarian Association of Physiotherapists / Асоциация на Физиотерапевтите в България
Croatia	Croatian Council of Physiotherapists / Hrvatska komora fizioterapeuta
Cyprus	Cyprus Association of Physiotherapists / Παγκύπριος Σύλλογος Φυσιοθεραπευτών
Czech Republic	Union of Physiotherapists of the Czech Republic / Unie fyzioterapeutu České republiky
Denmark	Association of Danish Physiotherapists / Danske Fysioterapeuter
Finland	Finnish Association of Physiotherapists / Suomen Fysioterapeutit - Finlands Fysioterapeuter
Germany	Physio Deutschland / Deutscher Verband für Physiotherapie (ZVK) e. V.
Greece	Panhellenic Physiotherapists' Association
Hungary	Association of Hungarian Physiotherapists / Magyar Gyógytornász-Fizioterapeuták Társasága
Ireland	Irish Society of Chartered Physiotherapists (ISCP)
Italy	Italian Association of Physiotherapy / Associazione Italiana di Fisioterapia
Latvia	Latvian Association of Physiotherapists / Latvijas Fizioterapeitu Asociācija
Lithuania	Lithuanian Physiotherapy Association / Lietuvos Kineziterapeutų Draugija
Luxembourg	Luxembourg Association of Physiotherapists / Association Luxembourgeoise des Kinésithérapeutes (ALK)
Malta	Malta Association of Physiotherapists
Netherlands	Royal Dutch Society for Physiotherapy / Koninklijk Nederlands Genootschap Voor Fysiotherapie
Romania	Order of Physiotherapists in Romania / Colegiul Fizioterapeuților din România
Slovakia	Slovak Chamber of Physiotherapists / Slovenská Komora Fyzioterapeutov
Slovenia	Slovenian Association of Physiotherapists / Strokovno Združenje Fizioterapevtov Slovenije
Spain	Asociación Española de Fisioterapeutas / Spanish Association of Physiotherapists
Sweden	Swedish Association of Physiotherapists / Fysioterapeuterna

Non-EU Physiotherapy organisations:

Bosnia and Herzegovina	Association of Physiotherapists in Bosnia and Herzegovina (UfuBiH)
Iceland	Icelandic Physiotherapy Association / Félag sjúkráþjálfara
Israel	Israeli Association of Physiotherapists
Lebanon	Order of Physiotherapists in Lebanon
Liechtenstein	Physiotherapists' Association of the Principality of Liechtenstein / Physiotherapeuten Verband Fürstentum Liechtenstein (PVFL)
Norway	Norwegian Physiotherapist Association / Norsk Fysioterapeutforbund
Switzerland	Physioswiss / Schweizer Physiotherapie Verband
Turkey	Turkish Physiotherapy Association / Türkiye Fizyoterapistler Derneği
Ukraine	Ukrainian Association of Physical Therapy / Українська Асоціація фізичної терапії
United Kingdom	Chartered Society of Physiotherapy

Umbrella organisation:

ENPHE: European Network of Physiotherapy in Higher Education

