



EUROPEAN
COMMISSION

Brussels, **XXX**
[...](2026) **XXX** draft

COMMISSION DELEGATED DIRECTIVE (EU) .../...

of **XXX**

**supplementing Directive 2005/36/EC of the European Parliament and of the Council by
establishing a common training framework for physiotherapists**

(Text with EEA relevance)

This draft has not been adopted or endorsed by the European Commission. Any views expressed are the preliminary views of the Commission services and may not in any circumstances be regarded as stating an official position of the Commission.

EXPLANATORY MEMORANDUM

1. CONTEXT OF THE DELEGATED ACT

Following amendments introduced by Directive 2013/55/EC¹, Chapter IIIA on automatic recognition based on common training principles was included in Title III of Directive 2005/36/EC on recognition of professional qualifications².

Article 49a of Directive 2005/36/EC empowers the Commission to adopt delegated acts establishing common training frameworks ('CTFs'). CTFs are common sets of the minimum knowledge, skills and competences that are required by a minimum number of Member States for the pursuit of a specific profession. The establishment of CTFs aims to facilitate free movement of professionals without fully harmonising education or regulatory frameworks. CTFs support the comparability of professional knowledge, skills and competences and help ensure the safety of people receiving services and the quality of professional services across the EU, while fully respecting the diversity of national education systems and regulatory frameworks.

Expanding automatic recognition through CTFs is aligned with the objectives of the forthcoming Fair Labour Mobility package, which aims to facilitate fair and efficient labour mobility across the Union. In this context, the Commission intends to further develop CTFs under Directive 2005/36/EC, when there is sufficient interest by stakeholders and the conditions set out in the Directive are fulfilled. The aim is to follow-up on the first CTF, established by the present act, with additional frameworks in the coming years, building in particular on a horizontal study currently underway to identify professions suitable for the establishment of CTFs, as well as on a streamlined programme of work with the relevant expert group.

Based on Article 49a(2) of Directive 2005/36/EC "a common training framework shall comply with the following conditions:

- a. it enables more professionals to move across Member States;
- b. the profession to which it applies is regulated, or the education and training leading to the profession is regulated in at least one third of the Member States;
- c. the common set of knowledge, skills and competences combines the knowledge, skills and competences required in the systems of education and training applicable in at least one third of the Member States; it shall be irrelevant whether the knowledge, skills and competences have been acquired as part of a general training course at a university or higher education institution or as part of a vocational training course;
- d. the CTF shall be based on levels of the EQF, as defined in Annex II of the Recommendation of the European Parliament and of the Council of 23 April 2008 on the establishment of the European Qualifications Framework for lifelong learning³;

¹ 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, OJ L 354, 28.12.2013, p. 132.

² Directive 2005/36/EC of the European Parliament and of the Council of 7 September 2005 on the recognition of professional qualifications, OJ L 255, 30.9.2005, p. 22.

³ Recommendation of the European Parliament and of the Council of 23 April 2008 on the establishment of the European Qualifications Framework for lifelong learning, OJ C 111, 6.5.2008, p. 1.

- e. the profession concerned is neither covered by another CTF nor subject to automatic recognition under Chapter III of Title III;
- f. the CTF has been prepared following a transparent due process, including the relevant stakeholders from Member States where the profession is not regulated;
- g. the CTF permits nationals from any Member State to be eligible for acquiring the professional qualification under such framework without first being required to be a member of any professional organisation or to be registered with such organisation.”

The goal of this Directive is the establishment of the CTF for the profession of physiotherapist by listing the requirements that constitute the common set of minimum knowledge, skills and competences necessary for the pursuit of that profession.

Establishment of the CTF does not require Member States to modify the training programmes they already have in place. Rather, the CTF is based on existing commonalities across countries as regards the training programme and competences of physiotherapists. The CTF is without prejudice to Member States’ competence to maintain or introduce higher national education and professional requirements, in accordance with Union law.

In accordance with Article 49a(6), the national qualifications falling under the CTF may be included in an implementing act on the basis of notifications received within six months of the entry into force of this Directive.

Member States are generally required to grant automatic recognition to qualifications that meet the standards laid down in the CTF, providing the holders of these qualifications with the same access to the profession as the holders of professional qualifications acquired in that Member State. However, in accordance with Article 49a(5) of Directive 2005/36/EC a Member State may be exempted from both the obligation to introduce the CTF and the duty to grant automatic recognition if it can demonstrate that: (a) it does not offer such training in its territory; (b) the CTF would adversely disrupt its national education system; or (c) substantial training differences pose a serious risk to public health or safety.

Qualifications issued in a Member State that give access to the profession of physiotherapist and which are not covered by the CTF, will continue to be assessed by the host Member States under the rules of the general system of Directive 2005/36/EC.

If the training of physiotherapists is regulated at national level, and the national regulation fulfils the requirements to participate in the CTF, all educational institutions in the Member States that deliver such training would be able to participate in the CTF without further assessments of the individual training programmes. If the training of physiotherapists is not regulated at national level, or the national regulation does not fulfil the requirements of the CTF, an educational institution may participate in the CTF if it offers training which fulfils the requirements established by the CTF.

If a Member State does not have physiotherapist qualifications in place that fulfil the requirements for participation in the CTF, participation would only be possible if the training is updated to meet the CTF’s requirements. Only training that fulfils the requirements listed in this Delegated Directive will be covered by the CTF.

2. CONSULTATIONS PRIOR TO THE ADOPTION OF THE ACT

In 2022 and 2023, the Commission discussed the topic of CTFs with the relevant expert group, the Group of Coordinators for the recognition of professional qualifications. Following

the identification of the physiotherapy profession⁴ as a profession of interest for establishing a CTF, a survey was conducted to map the education and training requirements for the profession of physiotherapist across Member States. The results of this survey informed the decision to continue exploring the possibility of creating a CTF for this profession in the framework of a Subgroup on CTFs⁵ established at the meeting of the Group of Coordinators in March 2024⁶.

Subsequently, more detailed input was gathered from various stakeholders (competent authorities, professional associations, educational institutions, physiotherapy experts and members and observers of the Subgroup on CTFs) in order to map the national requirements pertaining to the regulation, education and training of physiotherapists.

The Commission analysed the collected data and carried out a comprehensive comparative assessment to identify commonalities and discrepancies across EU/EEA countries as regards the regulatory framework, training and education of the physiotherapist profession. On 27 November 2024, the Commission presented to the Subgroup on CTFs the preliminary mapping of the physiotherapist regulation and training based on stakeholder input.

As the feasibility of establishing a CTF is closely related to the requirements outlined in Article 49a of Directive 2005/36/EC, the focus was on analysing and comparing the data related to these requirements: (i) in how many Member States the physiotherapy profession is regulated; (ii) which EQF level the entry-level physiotherapy education is based on in most Member States; and (iii) which knowledge, skills and competences are required for physiotherapists in the systems of education and training in most Member States. The data analysis also sought to provide a greater understanding of the physiotherapist profession across EU/EEA countries.

In June 2025, the project report: *Feasibility of Establishing a Common Training Framework for the Profession of Physiotherapist - Mapping the regulation, education and training of the physiotherapist profession in EU/EEA countries*⁷ was presented to the Group of Coordinators and the Subgroup on CTFs. They were invited to provide comments in writing on the report by 1 October 2025. Based on the mapping of the physiotherapist profession, this report concluded that it was feasible to establish a CTF for the profession of physiotherapist under Article 49a of Directive 2005/36/EC.

On the basis of the comments received on the report, the Commission consolidated the main points raised, informed the Group of Coordinators in October 2025, and in November launched a further survey of Subgroup Members to identify their preferences regarding the proposed direction and content of the CTF. Based on the results collected, the Commission

⁴ According to the European Skills, Competences, Qualifications and Occupations ([ESCO](#)) Code 2264.2 physiotherapists are autonomous health professionals who are responsible for developing, maintaining or restoring motor function and movement throughout the lifespan using evidence-based practice. They relieve pain and treat or prevent physical conditions associated with injury, disease or other impairments. Physiotherapists empower patients and their carers to manage the condition outside clinical settings. They work within their scope of practice and their professional code of conduct.

⁵ The possibility to participate in the work of the Subgroup was open to the members of Group of Coordinators from all the Member States and the observers from the three EU/EEA countries, as well as to experts in physiotherapy that each participating country could designate.

⁶ The Commission Decision establishing the Group of Coordinators, the Subgroup and the minutes of the meetings of the Group of Coordinators and the Subgroup, are available here: [Register of Commission expert groups and other similar entities](#)

⁷ This report was subsequently updated, following the consultations with Member States, and it was published in March 2026: [Feasibility of establishing a common training framework for the profession of physiotherapist - Publications Office of the EU](#)

subsequently informed the Group of Coordinators and consulted the Subgroup in December, while inviting further written input from Subgroup Members until mid-January 2026.

The draft delegated act was sent to the Subgroup and main expert Group on 13 February 2026, for written comments by 27 February. The Subgroup was then consulted on the draft at the meeting of 5 March 2026. Subsequently, the updated draft was shared with both the Subgroup and the Group for any further written comments between 5 and 10 March, and was the subject of a consultation at the meeting of the Group on 12 March 2026.

 The present draft incorporates certain changes proposed by Member States during the above-mentioned consultation, as confirmed by the Commission at the meetings of 5 and 12 March. These include: clarifications on the scope and effects of the CTF; revisions of the elements used to determine the level of the CTF (deletion of minimum number of years of training, addition of minimum number of ECTS credits); description of professional autonomy; adjustments to the list of subjects and to the knowledge, skills and competences; specification of clinical training requirements.

The draft delegated act was the subject of a call for evidence between 24 February and 24 March 2026. The comments received through this call for evidence have been duly considered and did not warrant further changes to the draft beyond those introduced following the consultation of the expert Group and Subgroup.

The draft delegated act was also subject to public feedback in the period xxx. Commission received the following comments xxx and accommodated them in the following way xxx

3. LEGAL ELEMENTS OF THE DELEGATED ACT

The empowerment to adopt this Directive is provided for in Articles 49a(4) and 57c of Directive 2005/36/EC.

Article 1 of the Directive sets out its subject matter and Article 2 delineates its personal scope.

Article 3 explains the effects of automatic recognition granted under this Directive.

Article 4 lays down the level of the CTF, and Article 5 sets out its minimum training content.

Article 6 provides for the possibility to review the CTF.

Article 7 sets the transposition period and the obligation for Member States to communicate the measures adopted to the Commission.

Article 8 specifies the date of entry into force of this Directive, and Article 9 identifies its addressees.

COMMISSION DELEGATED DIRECTIVE (EU) .../...

of **XXX**

supplementing Directive 2005/36/EC of the European Parliament and of the Council by establishing a common training framework for physiotherapists

(Text with EEA relevance)

THE EUROPEAN COMMISSION,

Having regard to the Treaty on the Functioning of the European Union,

Having regard to Directive 2005/36/EC of the European Parliament and of the Council of 7 September 2005 on the recognition of professional qualifications⁸, and in particular Article 49a(4) thereof,

Whereas:

- (1) Currently, physiotherapists qualified in one Member State benefit from the recognition of their qualifications for the purpose of cross-border access to the same regulated profession in another Member State under the conditions laid down in Articles 10 to 14 of Directive 2005/36/EC (general system of recognition 
- (2) Establishing a common training framework for physiotherapists ('CTF') **will introduce automatic cross-border recognition of evidence of professional qualifications in physiotherapy that meet the minimum training requirements set out in the CTF and have been notified to the Commission and the other Member States; those qualifications may then be listed in the implementing act which the Commission may adopt pursuant to Article 49a(6) of Directive 2005/36/EC.**
- (3) For physiotherapists whose qualifications do not meet the requirements of the CTF, or physiotherapists whose qualifications are submitted for recognition to a Member State exempted from the CTF on the basis of Article 49a(5) of Directive 2005/36/EC, the general system of recognition of their qualifications under Directive 2005/36/EC is to apply.
- (4) **The profession of physiotherapist or the education and training leading to the qualification as a physiotherapist is currently regulated in at least one third of the Member States.**
- (5) In most Member States, the entry level education to gain access to practice the profession of physiotherapist is based on the same level of the European Qualifications Framework ('EQF')⁹. It is thus possible to base the CTF for physiotherapists on a level of the EQF.

⁸ OJ L 255, 30.9.2005, p.22, ELI: <http://data.europa.eu/eli/dir/2005/36/oj>

⁹ Council recommendation of 22 May 2017 on the European Qualifications Framework for lifelong learning and repealing the recommendation of the European Parliament and of the Council of 23 April 2008 on the establishment of the European Qualifications Framework for lifelong learning (OJ C 189, 15.6.2017, p. 15).

- (6) In the systems of education and training applicable in at least one third of the Member States, there is a common set of knowledge, skills and competences to be acquired by physiotherapists as part of a general training course at a university or higher education institution. That common set of knowledge, skills and competences should be reflected in the list of requirements that constitute the CTF.
- (7) The profession of physiotherapist is neither covered by another CTF nor subject to automatic recognition under Chapter III of Title III of Directive 2005/36/EC.
- (8) The CTF for physiotherapists has been prepared following a transparent due process, including consultation of the relevant stakeholders from Member States where the profession is not regulated.
- (9) In accordance with Article 49a(2), point (g), of Directive 2005/36/EC, the CTF is to permit nationals from any Member State to be eligible for acquiring the professional qualification under that framework without first being required to be a member of any professional organisation or to be registered with such an organisation.
- (10) The common training framework for physiotherapists should therefore be adopted,

HAS ADOPTED THIS DIRECTIVE:

Article 1 *Subject matter*

1. This Directive establishes rules in accordance with which a Member State which makes access to or pursuit of the profession of physiotherapist in its territory contingent upon possession of specific professional qualifications shall recognise automatically, for access to and pursuit of that profession, qualifications obtained in one or more other Member States which allow the holder to pursue the same profession there, and which satisfy the requirements laid down in this Directive.

2. This Directive establishes the set of minimum knowledge, skills and competences to be included in the common training framework for physiotherapists ('CTF')

Article 2 *Scope*

This Directive shall apply to nationals of a Member State who hold qualifications obtained in one or more other Member States and satisfy the requirements laid down in this Directive and who wish to pursue the profession of physiotherapist in a Member State other than that in which they obtained their professional qualifications, on either a self-employed or employed basis.

Article 3 *Automatic recognition*

1. Each Member State shall recognise automatically evidence of formal qualifications giving access to the professional activities of physiotherapist which fulfils the conditions referred to in Articles 4 and 5 and has been notified to the Commission and the other Member States on the basis of Article 49a(6) of Directive 2005/36/EC.

2. Any citizen of the Union who holds such evidence of professional qualifications issued in a Member State shall be entitled to gain access to the professional activities of physiotherapists

in other Member States subject to the same conditions as physiotherapists who have acquired their qualification in those Member States.

Article 4

Minimum level of the qualification to benefit from the automatic recognition

1. The qualification as a physiotherapist shall certify training of at least 180 ECTS credits, and shall be based on at least level 6 of the EQF as well as the accomplishment of the traineeship in Member States where this is mandatory for the pursuit of the profession.

2. The qualification as a physiotherapist shall attest to the professional autonomy of the physiotherapist.

For the purposes of this Article, professional autonomy means the competence to independently assess and determine physiotherapy needs, both with and without referral from a doctor, and to plan, organise, implement and adapt physiotherapy intervention, based on scientific knowledge, clinical expertise and knowledge of the nature and ethics of the profession. Professional autonomy shall entail professional responsibility as well as collaboration with other healthcare professionals, including referral to a doctor in the patient's best interest in a timely manner.

Article 5

Minimum content of the training to benefit from the automatic recognition

1. The training as a physiotherapist shall include, as a minimum, the following elements:

(a) Training subjects:

(i) Biological and physical sciences

- (1) Anatomy
- (2) Physical sciences (biophysics, biomechanics)
- (3) Physiology
- (4) Applied Pathology
- (5) Kinesiology and movement sciences
- (6) Pathokinesiology
- (7) General physiotherapy

(ii) Social, behavioural and technical sciences

- (8) Health Promotion
- (9) Applied psychology
- (10) Preventive healthcare

(iii) Clinical sciences

- (11) Musculoskeletal sciences
- (12) Orthopaedics
- (13) Rheumatology
- (14) Paediatrics
- (15) Sports injuries
- (16) Women's health
- (17) Pain theory/medicine
- (18) Geriatrics and care of the elderly
- (19) Traumatology

- (20) Neurology
- (21) Orthotics and prosthetics
- (22) Cardiology
- (23) Physiotherapy in clinical sciences
- (24) Pneumology/pulmonology
- (25) Internal diseases

(iv) Interventional skills

- (26) Physical agent modalities (thermal, sound, electrical and light)
- (27) Ergonomics
- (28) Manual techniques
- (29)  Massage techniques 
- (30) Therapeutic exercise physiotherapy
- (31) Patient education and prophylactics
- (32)  Rehabilitation

(v) Interventional skills linked to specific fields

- (33) Musculoskeletal physiotherapy
- (34) Sport therapy
- (35) Intensive care
- (36) Cardio-respiratory physiotherapy
- (37) Neurological physiotherapy
- (38) Pre- and post-operative recovery and intervention
- (39) Oncology
- (40) Physiotherapy for different population groups (such as children, older people, persons with disabilities, pregnant women)

(vi) Evidence-based practice

- (41) Research methods and research application
- (42) Theoretical foundations of research

(vii) Ethics and professional practice

- (43) Communication
- (44) Ethics and legislation

(b) Training as a physiotherapist shall include clinical training representing a clearly identifiable component of the programme, consisting in no less than 1 000 hours and carried out under supervision in appropriate clinical settings and in direct contact with patient 

(c) Training as a physiotherapist shall provide an assurance that the professional in question has acquired the following knowledge, skills and competences:

(i) Diagnosis and treatment plans

- (1) Ability to independently evaluate clients'/patients' musculoskeletal system symptoms and health conditions and to determine if physiotherapeutic care is indicated or if a referral to a doctor is necessary
- (2) Proficiency in formulating physiotherapy diagnoses and prognoses
- (3) Ability to independently consider and screen for differential diagnosis
- (4) Ability to independently diagnose functional disorders of the musculoskeletal system

- (5) Capacity to independently design tailored client/patient-centred treatment plans
- (6) Ability to independently design, implement and evaluate physiotherapeutic exercises
- (7) Capacity to design, implement and evaluate therapeutic exercise programmes for different population groups (such as children, older people, persons with disabilities, pregnant women)

(ii) Physiotherapy practice

- (8) Ability to implement various physiotherapy interventions safely and effectively, including exercise therapy, manual therapy and physical modalities
- (9) Knowledge of the biological, physical and clinical sciences and ability to apply them to physiotherapy practice
- (10) Knowledge and understanding of re-education and functional recovery, including methods, procedures and physiotherapeutic actions related to these fields
- (11) Capacity to independently monitor and evaluate physiotherapy intervention outcomes, and make necessary modifications
- (12) Ability to implement the social and behavioural sciences relevant for physiotherapy practice
- (13) Ability to consider socio-economic, personal and cultural factors in the physiotherapeutic assessment and examination of the client/patient
- (14) Ability to incorporate psychological principles into physiotherapy practice

(iii) Ethics and professionalism

- (15) Understanding of professional ethics, standards of practice and legal regulations
- (16) Basic knowledge of healthcare systems, organisational structures and healthcare policies
- (17) Ability to practice as an autonomous professional, exercising one's own professional judgment
- (18) Ability to maintain client/patient records appropriately and in accordance with ethical and legal requirements

(iv) Communication

- (19) Effective communication skills with clients/patients
- (20) Effective communication skills with other healthcare providers

(v) Social science and public health

- (21) Knowledge of preventive healthcare and health promotion work
- (22) Ability to adapt to changes in healthcare and society
- (23) Knowledge of public health concerns and of prevention activities to improve public health
- (24) Ability to collaborate with clients/patients, caregivers and healthcare team members

(vi) Professional collaboration and management

- (25) Ability to collaborate with other members of interdisciplinary and multi-professional teams
- (26) Knowledge of one's own role and the role and responsibility of others in an interdisciplinary team
- (27) Ability to apply theoretical knowledge in practice and employ clinical reasoning
- (28) Ability to make decisions and act based on knowledge of evidence-based practice



Article 6 Review

No later than five years after the expiry of the transposition period of this Directive, the Commission, in cooperation with the Member States, shall reassess the CTF established by this Directive, in particular its content and its continued suitability in light of generally acknowledged scientific and technical progress in the profession.

Article 7 Transposition

1. Member States shall bring into force the laws, regulations and administrative provisions necessary to comply with this Directive by [Publication Office: Please insert a date: 18 months after publication of the legal act] at the latest. They shall forthwith communicate to the Commission the text of those provisions.

2. When Member States adopt those provisions, they shall contain a reference to this Directive or shall be accompanied by such a reference on the occasion of their official publication. Member States shall determine how such reference is to be made.

3. Member States shall communicate to the Commission the text of the main provisions of national law which they adopt in the field covered by this Directive.

Article 8 Entry into force

This Directive shall enter into force on the twentieth day following that of its publication in the *Official Journal of the European Union*.

Article 9 Addressees

This Directive is addressed to the Member States.

Done at Brussels,

*For the Commission
The President*

Ursula VON DER LEYEN

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