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GROUP OF COORDINATORS FOR THE RECOGNITION OF PROFESSIONAL QUALIFICATIONS - SUB-GROUP ARCHITECTURE

NON-PAPER: ISSUES ON COMPLIANCE OF THE PRE-EXISTING 5 YEAR PROGRAMMES WITH NEW ARTICLE 46 REQUIREMENTS

This paper is to support the discussion at the meeting of 10th February 2017 on the compliance of pre-existing 5 year programmes in architecture with the new training requirements.

BACKGROUND

Directive 2005/36/EC (as last amended by Directive 2013/55/EU) requires that training programmes comply with the new requirements of Article 46 as to the minimum duration and contents of the training programmes for architecture. In particular, the minimum duration of training has been increased from at least 4 years to at least 5 years of full-time study at a university or not less than 4 years of full-time study at a university and a completion of two years of professional traineeship.

Prior to entry into force of the above mentioned training requirements most Member States already had in place training programmes of at least 5 years' duration (hereinafter "pre-existing 5 year programmes"). Some of these programmes offered, for instance, the possibility of specialising within the architectural profession, acquiring additional skills and knowledge not directly linked to architecture, or even simultaneously acquiring qualifications in more than one field (e.g. architecture and engineering).

Bearing in mind that pre-existing 5 year programmes were listed in the Annex at the time of entry into force of the new requirements, they have been assessed against the requirements previously in force (i.e., a minimum 4 years of duration and the requisite skills and knowledge listed in Article 46(2) throughout those 4 years).

The increase in minimum training durations presents an additional challenge with respect to the process of notification and examination of such diplomas. On the one hand it implied a need for a review of all such diplomas currently listed in the Annex. On the

other hand, re-notification of all such diplomas would have presented a significant administrative burden for the competent authorities.

The issue of new requirements was discussed at the meeting of 26 February 2016. The Commission first stressed the legal obligation of each Member State to ensure compliance of any programme already listed in the Annex and to withdraw any programme not meeting the new standards. It has to be reported that since 2016, there has been no communication in IMI of any withdrawal of a pre-existing programme in architecture from the Annex.

On the procedural issue, the Commission suggested three main types of IMI notifications for the affected programmes in architecture¹. It was also agreed with Member States that there was no necessity to re-notify each of these programmes via IMI, provided they remain in line with new Article 46.

Subsequent to the meeting of 26 February 2016, some stakeholders and one Member State have raised a particular issue of compliance of 5 years programmes, namely, whether compliance of these programmes with the minimum knowledge and skills listed in Article 46(2) shall be assessed throughout the five years of minimum required duration.

There is therefore a need to re-discuss the issue of compliance with the requirements of Article 46(2) of the programmes in architecture of at least 5 years duration that were listed in the Annex prior to entry into force of revised training conditions

1. COMPLIANCE WITH THE MINIMUM KNOWLEDGE AND SKILLS UNDER ARTICLE 46(2) THROUGHOUT THE FIVE YEARS OF MINIMUM REQUIRED DURATION

In its non-binding opinion of 29.8.2006², the Advisory Committee on Education and Training in the field of Architecture recommended in relation to the minimum training requirements that were previously in force (i.e., minimum 4 years' duration):

"In order for a diploma to comply with the new Qualifications Directive it shall be necessary for the educational programme of that diploma to consist of a minimum of four years which are dedicated to a curriculum which embodies the eleven points.

Once a diploma can be shown to comply to this extent Schools of Architecture should be free to introduce any other subjects or areas of specialisation that they see fit. However, bearing in mind the Report and Recommendations on Post-Diploma Education and Training in Architecture⁴ of March 1990, the introduction of areas of Specialisation should not occur in the early years of the Course since this might prevent students from having an overall balanced view of the various necessary aspects of the education and

¹ Under category (A) "New title / evidence / certificate / training program or modified training program" Member States were specifically invited to notify the courses that were listed as 4 years but which have been subsequently amended in order to comply with new training requirements (at least 5 years duration or 4+2 model). Under Category (B) "Change of denomination of the title / evidence / certificate / awarding body" Member States were invited to notify redacting changes having with no effect on the substance of the courses. Under Category (C) "Withdrawal of a previously notified training program / evidence of formal qualification from the annex of Directive 2005/36/EC" Member States were called to withdraw any courses not complying with new training requirements.

² MARKT/D/4984/2/2006-EN orig.

training required for Architects. Appendix II contains a number of examples of structures of diplomas in architecture which could be deemed to comply with both Directives."

In Appendix II, the Committee has presented the examples of some different formats for Architectural Education which could be regarded as being in compliance with the requirements then in force:

- (1) A straight 4 or 5 year programme in architecture where the curriculum clearly follows the guidelines set out in the eleven points.
- (2) A "4+1" type programme where the first four years clearly follows the structure of the eleven points set out in both Directives and where the 5th year or the plus 1 year can deal with almost any other subject the school wishes.
- (3) A "3+2" programme where the first 3 years of the bachelors master's programme clearly follow the format of the eleven points and where at least the 1st of the two years of the masters programme also clearly follows the format of the eleven points.

The Committee recommended that a 5 year programme or a "3+2" year programme of which at least 80% of the curriculum clearly follow the eleven points of the Directive would be considered compliant and that it would seem reasonable that the remaining 20% could either be one single year at the end or half of each of the fourth and fifth years of the programme. The Committee also suggested that specialisation should not be introduced in the early years of the course, programmes which begin with an identified specialisation, or a specialisation which is introduced before year 4 could be considered not to be principally concerned with Architecture and therefore would not comply with the Directive.

Bearing in mind that the minimum duration of training was increased from at least 4 to at least 5 years' duration, the above recommendations of the Committee would need to be revisited. While 5 year programmes in architecture whose curricula clearly follow the guidelines set out in the eleven points of Article 46(2) would meet the new training standards, compliance of other formats of training might need to be indeed reconsidered in light of the new training requirements. This is particularly true for the "4+1" and "3+2" types of programmes, which might not clearly follow the format of the eleven points throughout the minimum required five years of training.

We would like to invite the Group of Coordinators to discuss how Member States should ensure compliance of training programmes of at least 5 years duration (in particular those where final years are dedicated to specialisations not directly linked to architecture) with the eleven points of Article 46(2) in light of the new requirements and taking into account the above mentioned recommendations of the Advisory Committee. We would also invite Member States to share their views and experiences regarding 4+1" and "3+2" formats of programmes in that context.

2. A NEED TO COMMUNICATE NON-COMPLIANCE OF PRE-EXISTING 5 YEAR PROGRAMMES TO THE COMMISSION AND THE MEMBER STATES

As already mentioned, subsequent to the meeting of 26 February 2016 certain stakeholders sought clarifications from the Commission regarding compliance of pre-existing 5 years programmes with the revised training requirements to which the

Commission is not always in a position to provide assurances in the absence of sufficient information from Member States (since 2016 no withdrawal of a 5 year programme has been notified via IMI).

COM would like to recall that any programme that is found to be no longer compliant shall be withdrawn by using IMI notification option C "*Withdrawal of a previously notified training program / evidence of formal qualification from the annex of Directive 2005/36/EC*". The programmes notified via option C would not disappear from Annex V.7.1; instead, a reference to the latest date of compliance would be added.

3. CONCLUSIONS

The Commission therefore looks forward to the views of attendees on the 10th February 2017 concerning compliance of their pre-existing 5 year programmes with the new training requirements.