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Brussels, January 11, 2010

**European Federation of Psychologists Associations EFPA
Competent authorities of European governments dealing with health care professionals**

Plans concerning establishing a common platform for psychotherapy and psychotherapists

Dear Madam, dear Sir,

The **European Federation of Psychologists' Associations (EFPA)**, after consultation with the **European Board of Psychiatry of the European Union of Medical Specialists (UEMS)**, wants to express its view to the European Commission and to the competent authorities of European governments concerning plans to establish a "common platform" for psychotherapy and/or psychotherapists according to Article 15 of the Directive 2005/36/EC on the recognition of professional qualifications.

EFPA represents the profession of psychologists within the European Union both at the national and the European level. Its members are 35 national associations of psychologists including 26 of the 27 European member states. This representativeness is required by Article 15 of the Directive of all the organizations which would be considered eligible to submit a common platform concerning professional qualifications in a defined professional area.

EFPA has heard that an organization by the name European Association of Psychotherapy (EAP) has presented itself to the European Commission as a representative organization in the field of psychotherapy. The same organization EAP also publicly claims that it will establish a common platform for psychotherapy as a separate profession together with the European Commission.

Therefore EFPA, as representative of European psychologists at the national and the European level must point out to the European Commission and the competent authorities of European governments the following facts:

Psychotherapy is a professional activity practiced by psychologists, psychiatrists and in some European countries also by persons with other professional backgrounds.

The profession of psychotherapy is based on psychology and psychiatry, which are scientific disciplines conducted and taught at university level. Psychologists together with psychiatrists form the core of this professional activity both scientifically and professionally. In most European countries, the majority of psychotherapy practitioners are psychologists or psychiatrists.

EAP, the European Association of Psychotherapy does neither represent psychologists nor psychologists working as psychotherapists. On the contrary, this association has conflicting views with EFPA about psychotherapy and psychotherapy training – and EFPA therefore objects to its activities.

EAP is not a representative organization in the field of psychotherapy and psychotherapists as meant by Article 15 of the Directive 2005/36/EC on the recognition of professional qualifications. It is neither representative at the European level nor at the national level. In some EU Member States there is not even a member organization of EAP. And most importantly, EAP does not represent psychologists or psychiatrists at all, whereas they form the core of psychotherapy, scientifically and professionally.

Therefore, we strongly advise the European Commission and the competent authorities of the European governments to reject any negotiations about a “common platform” with this non-representative organization, EAP. Such activity would be a violation against the requirements of Article 15 of the Directive 2005/36/EC.

If the European Commission wants to negotiate about the regulation of the professional activity of psychotherapy, EFPA as representative European organization of psychologists is available for cooperation with the European Commission.

Sincerely,



Dr. Robert A. Roe,
President, EFPA

Copy :

European Commission : DG Health and Consumer – 1049 Brussels

For more information about EFPA see <http://www.efpa.eu>

Attachment:

Article 15 of the Directive 2005/36/EC on the recognition of professional qualifications - points 1 and 2

Waiving of compensation measures on the basis of common platforms

1. For the purpose of this Article, 'common platforms' is defined as a set of criteria of professional qualifications which are suitable for compensating for substantial differences which have been identified between the training requirements existing in the various Member States for a given profession. These substantial differences shall be identified by comparison between the duration and contents of the training in at least two thirds of the Member States, including all Member States which regulate this profession. The differences in the contents of the training may result from substantial differences in the scope of the professional activities.

2. Common platforms as defined in paragraph 1 may be submitted to the Commission by Member States or by professional associations or organisations which are representative at national and European level. If the Commission, after consulting the Member States, is of the opinion that a draft common platform facilitates the mutual recognition of professional qualifications, it may present draft measures with a view to their adoption in accordance with the procedure referred to in Article 58(2).