

Key gaps and implications of the Directive update

- The Directive sections under revision are outdated, and fail to reflect scientific advances in midwifery practice and education;
- The current update methodology is flawed, lacking cultural adaptation, transparency and inclusivity, risking biased or incomplete recommendations;
- Many EU/EEA countries treat the Directive as a maximum standard rather than a minimum, limiting midwives' freedom of movement across EU Member States;
- Alignment with Global Standards such as those by ICM, WHO and others is critical to harmonise education and practice across Europe and support European leadership in the midwifery sector;
- The Directive update has broader implications for gender equality, health system resilience, and economic development across the EU, and its update in alignment with Global Standards been included in the EU Gender Equality Strategy (2026–2030).

The need to update the Directive

The Directive on Professional Qualifications (Directive 2005/36/EC) aims to harmonise minimum education and practice standards across the EU/EEA to facilitate mutual recognition of professional qualifications and enable workforce mobility. Midwifery, as a key profession in sexual, reproductive, maternal, newborn and adolescent health (SRMNAH), is crucial to achieving EU health, gender equity, and sustainable development goals. However, the current Directive's provisions on midwifery education and scope of practice lag global best practices and scientific evidence, failing to adequately reflect midwives' evolving roles and competencies. The ongoing talks on a potential update process, led by DG-EMPL, represent a rare and urgent opportunity to modernise these standards. Unfortunately, the process exhibits significant methodological shortcomings, including reliance on unvalidated questionnaires available only in English, exclusion of advancements that are not reported by at least 16 countries, and limited transparency and stakeholder engagement. These limitations risk perpetuating disparities between countries where the Directive is interpreted as a ceiling rather than a floor for standards.

Professional bodies such as ICM, EFNNMA and the European Midwives Association (EMA), have collaborated to provide coordinated feedback emphasising the need for alignment with globally recognised standards. These standards enable midwives to safely and effectively provide over 90% of SRMNAH care needs, reduce maternal and neonatal mortality and morbidity, and enhance health system efficiency and resilience.

Alignment with global standards is essential

While respecting Member States' primary role in healthcare, the Directive's core purpose is to set minimum harmonised standards for midwifery education and practice. These standards ensure quality, facilitate workforce mobility, and support professional recognition across the EU/EEA. Failure to update the Directive in accordance with scientific evidence and ICM Global Standards risks sustaining fragmentation and inconsistencies, which hinder midwives' free movement and professional progression. Educational programmes in Finland and many other countries are already using the ICM Global Standards as a benchmark.

Moreover, midwifery remains a predominantly female profession facing intersectional challenges including gender bias, undervaluation, and professional competition. Adopting a gender-transformative lens in modernising the Directive is essential to empower midwives,

promote women's economic empowerment, and improve health outcomes, consistent with the EU's commitments to gender equality and the Sustainable Development Goals.

Ignoring alignment with Global Standards undermines the EU's commitment to evidence-based policy, gender equality, health workforce resilience, and patient safety. Reiterating only minor technical updates, as suggested by SPARK Policy Consulting, would reduce the EU's global competitiveness by leaving midwifery education stagnant while other countries advance. It would also widen gaps in education quality and midwifery autonomy that negatively affect care standards and workforce sustainability across the EU/EEA. Finally, it is a poor use of taxpayer resources, which should be used to improve and align the Directive with accepted Global Standards.

The Federation of Finnish Midwives calls together with ICM and EFNMA on EU policymakers to prioritise a comprehensive update of the Directive that

- Aligns midwifery education and practice standards with the latest evidence and global consensus as set by the ICM and WHO,
- Ensures the Directive serves as a floor, not a ceiling, encouraging Member States to exceed minimum requirements,
- Integrates a gender-transformative approach to recognise and empower the predominantly female midwifery workforce,
- Enhance transparency and stakeholder engagement throughout the update process.
- Facilitates equitable access to high-quality midwife-led care across the European Union.

The Federation of Finnish Midwives emphasizes that such an update will strengthen workforce mobility, improve quality and safety of care, and advance the EU's goals on gender equality, public health, and sustainable development.

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Sincerely,

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