Architects' Council of Europe

EU-US MRA (architectural services)

EU-US MRA, architectural services

The Architects' Council of Europe

- Representing 47 Member Organisations in EU28 + +

- EU legislative programme: PQD, PPD, EED

- cross-border service provision & trade in services

EU-US MRA, architectural services

Problems in 2005

- EU COM required a political interlocutor

- USTR not mandate to negotiate for or bind the State Licensing Bodies

- NCARB could negotiate for but not bind the SLBs

- Implausible to bring 54 jurisdictions to the table

- No definition or acceptance of the notion of Critical Mass

EU-US MRA, architectural services

Canada

- CETA – professional services chapter

- Template for MRAs annexed

- Negotiations with Canadian Architectural Licensing Authority (CALA); agreement this year?

EU-US MRA, architectural services

TTIP

- new momentum, fresh hope;

- Sub-federal issues to be addressed?

- New attitude to Critical Mass?

EU-US MRA, architectural services

Meetings resume

- DG TRADE-USTR-ACE-NCARB (13.02.15);

- Further meetings / telecons planned, possibly in the margins of TTIP rounds;

- EU28 vs. Critical Mass
  - 50% + 1 i.e. 28 States to sign up within 6 months or the MRA is abandoned);
  - rolling programme for others to accede over time

EU-US MRA, architectural services

Key differences

- Harmonisation vs Equivalency

- Licensing examinations: required in all US States (not so in most EU MS)

- Accreditation of Schools (NAAB in the USA; 3 approaches in the EU – QA agencies, Government Ministries, professional bodies)

- Traineeship – compulsory and structured in the USA; requirements vary in EU

EU-US MRA, architectural services

Key differences

- EU courses architecture-based throughout;

- US system allows a first degree in an unrelated subject e.g. History of Art, followed by an elongated Masters (3.5 years)

- Hence, the proposal to supplement qualifications with Compensatory Mechanism so that beneficiaries of the MRA will be considered to be broadly experienced.

EU-US MRA, architectural services

Conclusions

- We remain open to dialogue;

- Uncertain how an agreement based on Critical Mass can be equitably implemented

- The US side has difficulty with EU MS they perceive to be unregulated (NB. *ex* ante regulation vs *ex post* regulation)

- So we are working hard to explain the differences, while looking to resist an approach based on a forensic examination of systems.

EU-US MRA, architectural services

Thank you for your attention!