



"Building the future together"

EFRS, May 2025

**To the Estonian Ministry of Social Affairs,
and the Estonian Political Institutions,**

The **European Federation of Radiographer Societies (EFRS)** would like to express its strong **support for the formal recognition of radiographers in Estonia as healthcare professionals**, aligned with European frameworks and recommendations. As a federation representing over 110,000 radiographers and more than 8,500 radiography students through over 50 national societies and professional bodies and over 60 educational institutions across 38 countries, we remain committed to ensuring that the profession is duly recognised and regulated at all levels.

Over the years, the EFRS has worked closely with European institutions to promote professional recognition and education standards. In this regard, we would like to highlight the following important developments that support the urgent need for change in Estonia:

1. **ESCO Classification (European Skills, Competences, Qualifications and Occupations):** Radiographers are officially classified under **"Health Professionals"**. This is a key recognition at the EU labour market level and clearly aligns the profession with healthcare.
2. **EC RP 175 – Guidelines on Medical Exposures:** The European Commission explicitly defines radiographers as one of the healthcare professions directly involved in the use of ionising radiation for medical purposes, particularly in ensuring radiation protection and patient safety.
3. **EU-REST (European Union Radiation, Education, Staffing & Training) Project (2024):** The recently published final report from this EU-funded project further consolidates the radiographer's role as a central actor in medical imaging and radiation-based therapies. It emphasises the radiographer's responsibility and accountability within the healthcare system. Moreover, and additionally, this report highlights the necessity of formal higher education and ongoing training.
4. **IAEA Recommendations (2022):** The International Atomic Energy Agency recommends the establishment of registration and licensing frameworks for radiographers in Estonia to ensure



"Building the future together"

compliance with international standards and enhance patient and radiation safety.

Despite this broad EU-level recognition, the current situation in Estonia —where radiographers are not formally recognised as healthcare professionals—**is inconsistent with European practices and expectations.**

Radiographers in Estonia complete a 3.5-year professional higher education programme, corresponding to EQF Level 6, meeting European educational standards.

Failure to formally recognise radiographers:

- **Undermines patient safety and the quality of healthcare services.**
- **Limits professional mobility across the EU.**
- **Conflicts with European Directive 2005/36/EC, which mandates the recognition and regulation of healthcare professions' qualifications.**
- **Hinders Estonia's alignment with international standards on radiation protection and healthcare delivery.**

Formal recognition would:

- **Ensure safer clinical practices and improved radiation protection.**
- **Facilitate enhanced access to postgraduate education (EQF 7 & 8).**
- **Support greater professional mobility across Europe.**
- **Strengthen compliance with EU regulations and international standards.**
- **Support the inclusion of Estonia in EU-funded research and innovation initiatives.**
- **Lead to higher standards of practice, as professionals would have to meet strict educational and ethical requirements.**
- **Raise public trust in the health service, ensuring that radiation services are provided by recognised professionals who comply with European regulations and international recommendations.**

In conclusion, the EFRS strongly urges the Estonian authorities to take immediate action to recognise radiographers as healthcare professionals and to align education and professional status with

established EU and international standards. This includes ensuring full inclusion in national healthcare legislation and workforce policies.

We remain available to provide further information and participate in constructive discussions

With kind regards,



Dr. Patrizia Cornacchione

President of the EFRS

On behalf of the EFRS Executive Board

References:

1. ESCO (European Skills, Competences, Qualifications and Occupations)

 <http://data.europa.eu/esco/occupation/7639a601-6db0-41ed-9fb0-813d9b8beb05>

2. European Commission Radiation Protection Report 175 (RP175)

 <https://op.europa.eu/en/publication-detail/-/publication/9020ff7f-e7c6-4c11-a0f5-50449beeba0b>

3. EU-REST Report (European Union Radiation, Education, Staffing & Training)

 https://op.europa.eu/en/publication-detail/-/publication/dc0dd10d-d879-11ef-be2a-01aa75ed71a1/language-en?fbclid=IwZXh0bgNhZW0CMTAAR3kiO4_Hrp9aw2Qxz8hTJcdJldlhawEcnQNSftqxlvhkUslIVL7-xrl1Yg_aem_AxBPBv-dVOCZR9A-h9S5vg

4. European Qualifications Framework (EQF) Level 6 Benchmarking Document: Radiographers

 <https://api.efrs.eu/api/assets/posts/205>

5. EFRS Statement on Radiography Education

 <https://api.efrs.eu/api/assets/posts/201>

6. Report of the IAEA Pilot Advisory Mission on Radiation Protection and Safety in Medical Exposure in Estonia (22-30 March 2022)

 <https://www.sm.ee/sites/default/files/documents/2022-09/Pilot%20advisory%20mission%20on%20radiation%20protection%20and%20safety%20in%20medical%20exposure%20-%20Estonia%20-%202022.pdf>