




ΕΛΛΗΝΙΚΗ ΔΗΜΟΚΡΑΤΙΑ
ΥΠΟΥΡΓΕΙΟ ΥΓΕΙΑΣ
ΓΕΝΙΚΗ ΔΙΕΥΘΥΝΣΗ ΔΗΜΟΣΙΑΣ ΥΓΕΙΑΣ
ΚΑΙ ΥΠΗΡΕΣΙΩΝ ΥΓΕΙΑΣ
ΔΙΕΥΘΥΝΣΗ ΕΠΑΓΓΕΛΜΑΤΙΩΝ ΥΓΕΙΑΣ
ΤΜΗΜΑ Β΄

Ταχ. Δ/ση : Αριστοτέλους 17
Ταχ. Κώδικας: 104 33

Τηλέφωνο: 213 – 2161520
FAX : 210 – 5237651
E-mail: @moh.gov.gr

Αθήνα, 12 - 7 - 2017
Αρ. Πρωτ. Γ4β/Γ.Π. 53699
σχετ. 46638

ΠΡΟΣ:
Επαγγελματική Ένωση
Στοματικών και Γναθοπροσωπικών
Χειρουργών Ελλάδος

(μόνο με e mail: info@omfsurgeons.gr)

ΘΕΜΑ: «Χορήγηση στοιχείων»
ΣΧΕΤ.: άρθρο 5 παρ. 1 Ν. 2690/99 (ΦΕΚ 45 Α΄)

Σε απάντηση της από 11-7-2017 και της αριθ. 15/16-6-2017 αιτήσεως, σας αποστέλλουμε αντίγραφο του αριθ. Γ4β/Γ.Π. 32306/27-4-2017 ερωτήματος που απευθύναμε με μήνυμα ηλεκτρονικού ταχυδρομείου (2-5-2017) προς την αρμόδια Δ/ση της ΕΕ (European Commission, DG GROW, DG for Internal Market, Industry, Entrepreneurship and SMEs, Unit E5 Professional Qualifications and Skills), την από 5-7-2017 απάντηση της ΕΕ, DG GROW και διευκρινιστικό ερώτημα που αποστείλαμε με e mail 6-7-2017.

Η ΑΝΑΠΛ. ΠΡΟΪΣΤΑΜΕΝΗ ΤΗΣ ΔΙΕΥΘΥΝΣΗΣ

ΣΥΝΗΜΜΕΝΑ

6 φύλλα

Α. ΔΑΝΙΗΛΙΔΟΥ

ΕΣΩΤΕΡΙΚΗ ΔΙΑΝΟΜΗ

1. Γραφείο Προϊσταμένης
Γεν. Δ/σης Δημ. Υγείας
και Υπηρ. Υγείας
2. Δ/ση Γ4(3)





**HELLENIC REPUBLIC
MINISTRY OF HEALTH
GENERAL DIRECTORATE OF PUBLIC
HEALTH AND HEALTH SERVICES
DIRECTORATE OF HEALTH PROFESSIONALS
SECTION B'**

Address: 17 Aristotelous Str.
Athens, GR 104 33

Contact: D. Zafiropoulou

Tel. no: +30 213 2161526

Fax no: +30 210 5237651

e-mail: [redacted]@moh.gov.gr

Athens, 27 April 2017

Ref no: G4b /GP 32306

To:

European Commission

DG GROW

DG for Internal Market

Industry, Entrepreneurship
and SMEs

Unit E5 Professional

Qualifications and Skills

1000 Brussels, Belgium

Office: N105 01/74

E-mail: [redacted]@ec.europa.eu

SUBJECT: "Specialty registered as medical in the Directive 2005/36/EC" but regulated as both medical and dental by national law

REF.: Articles 25, 26 and Annex V 5.1.3 of the Directive 2005/36/EC on the recognition of professional Qualifications (as amended by Commission Delegated Decision (EU) 2016/790)

The hellenic Ministry of Health is currently considering amending article 22 (2) of Law 4272/2014 (GG 145/A/11.7.2014) and rendering anew the (greek) specialty of "oral and maxillo-facial surgery" as both medical and dental specialty (without altering the training program), practiced by professionals registered in both (greek) medical or dental chambers.

In view of the above, could you, please, advise whether such an amendment complies with the fact that the (greek) specialty of "oral and maxillo-facial surgery" is registered in the Directive 2005/36/EC (Annex V 5.1.3) as a medical specialty under "dental, oral and maxillo-facial surgery".

THE DEP. HEAD DEPARTMENT

ΘΕΩΡΗΘΗΚΕ ΓΙΑ ΤΗΝ ΑΚΡΙΒΕΙΑ
Ο ΠΡΟΪΤΑΜΕΝΟΣ ΓΡΑΜΜΑΤΕΙΑΣ
& α.α.

ΑΝΤΙΤΑΝΙΑ ΠΑΠΑΔΟΠΟΥΛΟΥ

A. DANILIDOU

Cc

Ministry of Education, Research and
Religious Affairs
Independent European Union Unit
37, Andrea Papandreou
151 80 Maroussi
Greece

Copy for information

1. General Secretary's office
2. Director-General of Public Health
and Health Services' office
3. Directorate G4(3)



ΕΛΛΗΝΙΚΗ ΔΗΜΟΚΡΑΤΙΑ
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ΔΙΕΥΘΥΝΣΗ ΕΠΑΓΓΕΛΜΑΤΙΩΝ ΥΓΕΙΑΣ
ΤΜΗΜΑ Β΄
Ταχ. Δ/ση : Αριστοτέλους 17
Ταχ. Κώδικας: 104 33
Πληροφορίες: Δ. Ζαφειροπούλου
Τηλέφωνο: 213 – 2161526
FAX : 210 – 5237651
E-mail: [\[redacted\]@moh.gov.gr](mailto: [redacted]@moh.gov.gr)

Αθήνα, 27 - 4 - 2017
Αρ. Πρωτ.Γ4β/Γ.Π. 32306

ΠΡΟΣ:
European Commission
DG GROW
DG for Internal Market
Industry, Entrepreneurship
and SMEs
Unit E5 Professional
Qualifications and Skills
1000 Brussels, Belgium
Office: N105 01/74
E-mail: [\[redacted\]@ec.europa.eu](mailto: [redacted]@ec.europa.eu)

ΘΕΜΑ: «Ειδικότητα καταχωρημένη ως ιατρική στην Οδηγία 2005/36/EK» αλλά ρυθμισμένη ως ιατρική και οδοντιατρική από το εθνικό δίκαιο
ΣΧΕΤ.: Άρθρα 25, 26 και Παράρτημα V 5.1.3 της Οδηγίας 2005/36/EK για την αναγνώριση επαγγελματικών προσόντων, όπως τροποποιήθηκε με την κατ' εξουσιοδότηση απόφαση (ΕΕ) 2016/790 της Επιτροπής

Το ελληνικό Υπουργείο Υγείας προτίθεται να τροποποιήσει τη διάταξη του άρθρου 22 παρ. 2 του Ν. 4272/2014 (ΦΕΚ 145/Α'/11.7.2014) καθιστώντας εκ νέου την (ελληνική) ειδικότητα της «στοματικής και γναθοπροσωπικής χειρουργικής» ως ιατρική και οδοντιατρική ειδικότητα (χωρίς αλλαγή του προγράμματος σπουδών), δυνάμει να ασκείται από επαγγελματίες εγγεγραμμένους σε (ελληνικούς) ιατρικούς ή οδοντιατρικούς συλλόγους.

Ενόψει των ανωτέρω, παρακαλούμε όπως διευκρινίσετε, εάν μία τέτοια τροποποίηση είναι σύμφωνη με το γεγονός ότι η (ελληνική) ειδικότητα της «στοματικής και γναθοπροσωπικής χειρουργικής» είναι καταχωρημένη στην Οδηγία 2005/36/EK (Παράρτημα V 5.1.3) ως ιατρική ειδικότητα κάτω από την επικεφαλίδα "dental, oral and maxillo-facial surgery".

Η ΑΝΑΠΛ. ΠΡΟΪΣΤΑΜΕΝΗ ΤΗΣ ΔΙΕΥΘΥΝΣΗΣ

ΘΕΩΡΗΘΗΚΕ ΓΙΑ ΤΗΝ ΑΚΡΙΒΕΙΑ
Ο ΠΡΟΪΣΤΑΜΕΝΟΣ ΓΡΑΜΜΑΤΕΙΑΣ
& α.α.

ΑΝΤΩΝΙΑ ΠΑΠΑΔΟΠΟΥΛΟΥ

Α. ΔΑΝΙΗΛΙΔΟΥ

ΚΟΙΝΟΠΟΙΗΣΗ

Υπουργείο Παιδείας, Έρευνας
και Θρησκευμάτων
Γεν. Γραμμ. Δια Βίου
Μάθησης και Νέας Γενιάς
Αυτοτελές Τμήμα Διεθνών και
Ευρωπαϊκών Σχέσεων
Ανδρέα Παπανδρέου 37
ΤΚ 151 80 Μαρούσι

ΕΣΩΤΕΡΙΚΗ ΔΙΑΝΟΜΗ

1. Γραφ. Γεν. Γραμμ.
2. Γραφείο Προϊσταμένης
Γεν. Δ/σης Δημόσιας Υγείας
και Υπηρεσιών Υγείας
3. Δ/ση Γ4(3)



EUROPEAN COMMISSION

Directorate for Internal Market, Industry, Entrepreneurship and SMEs
SERVICES

Free movement of professionals

ΥΠΟΥΡΓΕΙΟ ΥΓΕΙΑΣ
ΓΕΝΙΚΟ ΠΡΩΤΟΚΟΛΛΟ
Αρ. Πρωτ.: 529-93
Ημερ.: 06/07/17
Αριθμός Διοτ.: ΕΠ.Υ.6

Brussels, 05/07/2017

A. DANILIDOU
Deputy Head of Department
Health Professionals
Hellenic Ministry of Health
[redacted]@minedu.gov.gr
[redacted]@moh.gov.gr
By email only

Subject: Question concerning specialist training of doctors and dentists

Dear Mr. Danilidou,

I refer to your letter that was registered under Ares(2017)2247171 and to our previous correspondence in this regard.

Your letter concerns a foreseen legislative change of the Greek national law on medical and dental specialisations.

You kindly informed us that you are also considering in this context to revise the Greek notified titles under point 5.1.3. of Annex V of Directive 2005/36/EC on the recognition of professional qualifications ("the Directive") concerning maxillo-facial surgery.

1. Greek titles currently notified under the relevant points of Annex V of the Directive.

Firstly, it is important to outline what are the Greek titles notified currently under the respective points of Annex V of the Directive, and that are relevant for your current enquiry.

Regarding the specific case of dental and medical specialisations, it is important to clarify that the **Directive treats differently medical and dental specialisations** which are covered by the automatic recognition regime. Accordingly, national dental and medical specialist training programmes have to meet different minimum training requirements in order to be entered under points 5.1.2-3. (medical specialisations) or under point 5.3.3. (dental specialisations) of the Directive.

1. Amongst the **dental specialisations** (point 5.3.3. of Annex V of the Directive) Greece notified the following title in oral surgery¹:

Country	Evidence of formal qualifications	Body awarding the evidence of qualifications	Reference date
Ελλάς	Τίτλος Οδοντιατρικής ειδικότητας της Γναθοχειρουργικής (up to 31 December 2002)	— Περιφέρεια — Νομαρχιακή Αυτοδιοίκηση — Νομαρχία	1.1.2003

Consequently, this program is only available for graduates in basic dentistry.

2. Amongst **medical specialisations** (points 5.1.2-3. of the Directive) the Directive provides harmonised requirements for two specialist categories relevant for the issue raised by your letter.

Accordingly, the Directive provides different requirements for the specialisation of

- *"dental, oral and maxillo-facial surgery (basic medical and dental training, minimum period of training: 4 years)"* and for the specialisation of
- *"maxillo-facial surgery (only basic medical training, minimum period of training: 5 years)"*.

The general entry requirement for medical specialisations, as provided by Article 25(1) and (4) of the Directive, is a completed basic medical qualification listed in point 5.1.1. of Annex V of the Directive.

However, for the medical specialist category *"dental, oral and maxillo-facial surgery (minimum period of training: 4 years)"* the Directive provides for specific entry requirements (**double qualification requirement**). Accordingly, specialist trainings leading to the award of the evidence of formal qualifications as a *specialist in dental, oral and maxillo-facial surgery* (basic medical and dental training) assumes completion and validation of basic medical studies (Article 24 of the Directive) and, in addition, completion and validation of basic dental studies (Article 34 of the Directive).

To our knowledge (and according to the Annex V of the Directive) Greece has notified its title under the specialist category of *"dental, oral and maxillofacial surgery (basic medical and dental training)"*, which presumes that **both** a basic medical diploma and a dental diploma are required from professionals who obtained their specialisation in Greece and would like to benefit from its automatic recognition in other Member States.

The notified Greek title in point 5.1.3. of Annex V of the Directive looks as follows:

¹ The Greek national title in oral surgery (dental specialisation) was introduced by Directive 2001/19/EC.

Dental, oral and maxillo-facial surgery (basic medical and dental training)²	
	Minimum period of training: 4 years
Country	Title
Ελλάδα	Στοματική και Γναθοπροσωπική Χειρουργική ³

Greek has not notified any title under the category "Maxillo-facial surgery (basic medical training)".

2. Issues concerning the foreseen amendment

We understand from your letter that you are considering amendment of the Greek legislation to the extent that the same specialist training program would be accessible both for medical doctors and dental practitioners.

You would like to know whether such amendment could be compliant with the Directive.

2.1. Issues to consider concerning the medical specialist category

Should Greece wish to maintain its title under the current medical specialist category in point 5.1.3. of Annex V of the Directive, and given that this category requires the completion of both a medical and dental basic qualification, Greece shall ensure that the title would continue to be delivered only to professionals who obtained both basic qualifications.

Holders of neither only a basic medical qualification, nor only a basic dental qualification could benefit from the automatic recognition of this medical specialisation in other Member States.

2.2. Issues to consider concerning the dental specialist category

Should Greece additionally would consider adding the same title (Στοματική και Γναθοπροσωπική Χειρουργική) also to point 5.3.3. of the Directive as a dental specialisation in oral surgery the followings shall be considered:

In case Greece would allow holders of only basic dental qualifications to obtain the same specialisation, it would provide more clarity if these professionals were awarded with a different title (or with a clarification added to the title) in order to avoid that the same title causes confusion with the automatic recognition of the specialisations (as medical or as dental) in the potential host Member States.

² Training leading to the award of evidence of formal qualifications as a specialist in dental, oral and maxillo-facial surgery (basic medical and dental training) assumes completion and validation of basic medical studies (Article 24) and, in addition, completion and validation of basic dental studies (Article 34)

³ As of 10.7.2014

Moreover, given that we appreciate that you would not foresee any changes of the training program, it should also be demonstrated by the Greek authorities how the program meets the harmonised minimum training requirements of Article 35 as regards specialist dental trainings.

Finally, it should also be noted that Greece has already notified a title under the dental specialist category in oral surgery, therefore it would need to be clarified what is the relationship between the two training programs and titles.

3. Formalities


Should your assessment and internal discussions lead to the prescribed changes, the Greek competent authority should notify such amendments, under Article 21a of the Directive, via IMI, to the Commission.

Changes could also be initiated concerning point 5.1.3. of Annex V (Title of training courses in specialised medicine) or point 5.3.3. of Annex V of the Directive as explained.

I hope this information will be helpful for your internal discussions. I do apologise for the late reply but this complex issue required careful consideration.

Should you have any further questions please do not hesitate to contact us again.

Yours sincerely,



Andras Zsigmond

Contact:

Andras Zsigmond, Legislative Assistant, Telephone: [REDACTED]
[REDACTED]@ec.europa.eu

Δ/ση Επαγγελματιών Υγείας

Από: Δ/ση Επαγγελματιών Υγείας [dey@moh.gov.gr]
Αποστολή: Πέμπτη, 6 Ιουλίου 2017 1:16 μμ
Προς: [redacted]@ec.europa.eu
Κοινοποίηση: [redacted]@ec.europa.eu
Θέμα: RE: request for clarification regarding Ares(2017)2247171 ("specialty of "dental, oral and maxillo-facial surgery")

**SUBJECT: Request for clarification regarding your response to our request Ares(2017)2247171
"Specialty registered as medical in the Directive 2005/36/EC" but regulated as both medical and dental by national law"**

First, we would like to express our sincere gratitude for your assistance.

However, we would like to make certain points absolute clear and ask you to clarify whether point 2.1 of your response provides an answer to our question.

Our purpose (amending article 22 (2) of Law 4272/2014 GG 145/A/11.7.2014) is not to add the title "Στοματική και Γναθοπροσωπική Χειρουργική" to point 5.3.3. of the Directive as a dental specialization.

Greece would like to maintain its title under the current medical specialist category in point 5.1.3. of Annex V of the Directive and the requirements to remain the same (completion of both a medical and dental basic qualifications). Since in Greece "oral and maxillo-facial surgeons" hold both a medical and dental degrees, we would like to amend the law so that it shows in the (greek) title itself that the (greek) specialisation of "oral and maxillo-facial surgery" ("Στοματική και Γναθοπροσωπική Χειρουργική") belongs to both medical and dental sciences.

In view of the above, could we please have a direct response to the following question: If we render anew the (greek) specialty of "oral and maxillo-facial surgery" as both medical and dental specialisation (in our nation law), could greek "oral and maxillo-facial surgeons" be automatically recognized as "dental, oral and maxillo-facial surgeons" (medical specialisation) by virtue of article 25, 26 and Annex V 5.1.3 of the Directive 2005/36/EC?

We thank you in advance and hope for a prompt response to help us settle the matter.

A. DANIILIDOU
dep. Head department of
Health Professionals
Hellenic Ministry of Health
(+ 30 213 216 1520)

From: [redacted]@ec.europa.eu [mailto:[redacted]@ec.europa.eu]
Sent: Wednesday, July 05, 2017 3:34 PM
To: [redacted]@moh.gov.gr
Cc: [redacted]@ec.europa.eu; [redacted]@minedu.gov.gr
Subject: RE: REMINDER : Request regarding the specialty of "dental, oral and maxillo-facial surgery"

Dear Mr. DANIILIDOU,

Please find enclosed our reply on your letter that was registered under Ares(2017)2247171.

I hope this will be helpful. Please do not hesitate to contact me again should you need further clarifications.

Kind regards,

András

András Zsigmond

Legislative Assistant - Legal desk officer, policy

European Commission

DG for Internal Market, Industry, Entrepreneurship and SMEs
Unit E5 Professional Qualifications and Skills
1000 Brussels, Belgium
office: N105 01/74. tel.: [redacted]
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ec.europa.eu/bienkowska

From: Δ/νση Επαγγελματιών Υγείας [mailto:[redacted]@moh.gov.gr]

Sent: Wednesday, July 05, 2017 7:51 AM

To: ZSIGMOND Andras (GROW)

Cc: GROW E5

Subject: FW: REMINDER : Request regarding the specialty of "dental, oral and maxillo-facial surgery"

Importance: High

Dear Sir,

The Hellenic Ministry of Health would like to proceed with putting into place the regulation rendering anew the (greek) specialty of "oral and maxillo-facial surgery" as both medical and dental specialty.

We have been receiving requests by dentists interested in the matter being finally settled.

Would it be possible for us to have a prompt response by your Office to our request (dated 2-5-2017)?

Kind regards

A. DANIILIDOU

dep. Head department of
Health Professionals
Hellenic Ministry of Health
(+ 30 213 216 1520)

(Info : D. Zafiropoulou

IMI user

+ 30 213 216 1526)

From: Δ/νση Επαγγελματιών Υγείας [mailto:dey@moh.gov.gr]
Sent: Wednesday, June 14, 2017 2:19 PM
To: 'andras.zsigmond@ec.europa.eu'
Subject: FW: REMINDER : Request regarding the specialty of "dental, oral and maxillo-facial surgery"

We thank you for keeping us update.

From: Andras.ZSIGMOND@ec.europa.eu [mailto:Andras.ZSIGMOND@ec.europa.eu]
Sent: Wednesday, June 14, 2017 12:56 PM
To: dey@moh.gov.gr
Cc: GROW-E5@ec.europa.eu
Subject: RE: REMINDER : Request regarding the specialty of "dental, oral and maxillo-facial surgery"

Dear Colleagues,

Thank you for your kind reminder. I'm working on this case and will try to get back to you in the course of the next week.

With kind regards,

András

András Zsigmond

Legislative Assistant - Legal desk officer, policy

European Commission

DG for Internal Market, Industry, Entrepreneurship and SMEs
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From: Δ/νση Επαγγελματιών Υγείας [mailto:[redacted]@moh.gov.gr]
Sent: Wednesday, June 07, 2017 11:25 AM
To: ZSIGMOND Andras (GROW)
Cc: GROW E5
Subject: FW: REMINDER : Request regarding the specialty of "dental, oral and maxillo-facial surgery"

Dear Sir,

Could you please confirm that you have received of our e-mail.
We need to inform citizens (doctors) interested in the outcome.

On behalf of the
Department of Health Professionals
Hellenic Ministry of Health

From: Δ/νση Επαγγελματιών Υγείας [mailto: [REDACTED]@moh.gov.gr]
Sent: Tuesday, May 02, 2017 1:27 PM
To: '[REDACTED]@ec.europa.eu'
Cc: [REDACTED]@minedu.gov.gr'
Subject: Request regarding the specialty of "dental, oral and maxillo-facial surgery"

Please, find attached a request regarding the specialty of "dental, oral and maxillo-facial surgery".
We would like to have the opinion of your Office on the matter.

Thank you in advance.

A. DANILIDOU
dep. Head department of
Health Professionals
Hellenic Ministry of Health
(+ 30 213 216 1520)

(Info : D. Zafiropoulou
IMI user
+ 30 213 216 1526)

From: [redacted]@ec.europa.eu 
Subject: RE: Oral and Maxillofacial Surgery in Greece
Date: 14 July 2017 at 15:52
To: info@omfsurgeons.gr
Cc: [redacted]@ec.europa.eu



Dear Mr. Papadakis,

Thank you for your email.

I sent the following clarifications to the Greek Ministry of Health today:

Let me clarify that the Directive does not prevent you from internally considering the "oral and maxillo-facial surgery" as both a medical and a dental specialisation. For internal purposes therefore you are not prevented to implement these changes as long as the new regulation is justified and proportionate.

Nevertheless, the automatic recognition of this specialty would only be considered as a medical specialty in other Member States under point 5.1.3. of Annex V of the Directive, and given that this category requires the completion of both a medical and dental basic qualification. Greece shall ensure that the title would continue to be delivered only to professionals who obtained both basic qualifications.

I hope this helps.

Kind regards,

András Zsigmond

Legislative Assistant - Legal desk officer, policy

European Commission

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From: Επαγγελματική Ένωση Στοματικών και Γναθοπροσωπικών Χειρουργών Ελλάδος
[mailto:info@omfsurgeons.gr]

[mailto:andras.zsigmond@ec.europa.eu]

Sent: Friday, July 14, 2017 10:39 AM

To: ZSIGMOND Andras (GROW)

Subject: Re: Oral and Maxillofacial Surgery in Greece

HELLENIC
PROFESSIONAL UNION OF
ORAL AND MAXILLOFACIAL SURGEONS



Dear Mr. Zsigmond,

Yesterday the Greek Ministry of Health forwarded to us your response concerning the Greek specialty of Oral and Maxillofacial Surgery.

We concluded from your reply (especially Paragraph 2.1) that as long as the basic dual qualification (all Greek OMFS surgeons must hold a dental and medical degree before entering the training process) and the duration of the surgical training (minimum 4 years - we have 5) remain the same, there is no problem for the listing in the Medical Specialist Category of Annex V, regardless if the specialty in Greece is considered a Medical and Dental specialty. Have we interpreted your legal advice correctly?

I remind you that we have no purpose to create a new specialty that will have different entry requirements or different training. The specialty will remain one and the same, but it will be listed as a "Medical and Dental" specialty locally, here in Greece, and continue to be listed only in Point 5.1.3 of the Medical Specialist Category of Annex V.

Thank you in advance.

Sincerely,

Dr. Dimitrios Papadakis
Oral and Maxillofacial Surgeon
President of the Hellenic Professional Union of Oral and Maxillofacial Surgeons

On 5 Jul 2017, at 15:50, [REDACTED]@ec.europa.eu wrote:

Dear Mr. Papadakis,

Thank you for your background information, was very useful.

Given that the question was put horizontally I also answered in a more generic way. Nevertheless, should the ministry enquiry further specifically on internal situations we would be happy to provide further clarifications on that.

Kind regards,

András Zsigmond
Legislative Assistant - Legal desk officer, policy

European Commission

DG for Internal Market, Industry, Entrepreneurship and SMEs

Unit E5 Professional Qualifications and Skills

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<image001.jpg>

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From: Επαγγελματική Ένωση Στοματικών και Γναθοπροσωπικών Χειρουργών Ελλάδος [<mailto:info@omfsurgeons.gr>]

Sent: Saturday, June 17, 2017 3:47 PM

To: ZSIGMOND Andras (GROW)

Subject: Oral and Maxillofacial Surgery in Greece

<image002.jpg>

Dear Mr. Zsigmond

We were informed that the Greek Ministry of Health has requested your Legislative Opinion about the Greek Specialty of Oral and Maxillofacial Surgery. We are not aware about the exact legal request that was sent to you by our Ministry. We contact you to clarify our position and help you form your legal opinion.

The Greek Specialty of Oral and Maxillofacial Surgery, as we speak, has the following characteristics:

- The training begins after the completion of the Medical and Dental Degree
- The training period is 5 years
- Oral and Maxillofacial Surgeons are members of the Medical and Dental Council
- Is listed in the list of Medical Specialties recognised in Greece
- Is listed in the Medical Specialties of Annex V to Directive 2005/36/EC, in the table "Dental, oral and maxillo-facial surgery (basic medical and dental training)"

The community of Greek Oral and Maxillofacial Surgeons wish our specialty to be listed as a Medical and Dental Specialty, here in Greece. No other changes will occur. We don't wish to be listed in the list of Dental Specialties of Annex V, our interest is to be also a specialty of Dentistry for our local

v, we just want to be also a specialty of Dentistry for our local Greek market. Thus, we wish the specialty to have these characteristics:

- The training begins after the completion of the Medical and Dental Degree **(unchanged)**
- The training period is 5 years **(unchanged)**
- Oral and Maxillofacial Surgeons are members of the Medical and Dental Council **(unchanged)**
- Is listed in the list of Medical **and Dental** Specialties recognised in Greece **(changed)**
- Is listed in the Medical Specialties of Annex V to Directive 2005/36/EC, in the table "Dental, oral and maxillo-facial surgery (basic medical and dental training)" **(unchanged)**

We suppose that the question from our Ministry concerns the ability to be listed in the Medical Specialties of Annex V while we are a Medical and Dental Specialty locally. Since the Greek Specialty will again meet all the necessary requirements (Basic Medical and Dental Training, 5 year training which begins after the completion of both Medical and Dental degree, Medical Specialty), we don't see any problem.

I hope that this email will clarify the "problem". Please don't hesitate to contact us for any further information.

Sincerely,

Dr. Dimitrios Papadakis
Oral and Maxillofacial Surgeon
President of the Hellenic Professional Union of Oral and
Maxillofacial Surgeons