

IDE Research Bulletin

Research project summary based on papers for academic journals
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Multi-layered mutual recognition systems

Project Leader

HAMANAKA, Shintaro

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While earlier studies primarily focused on one aspect of domestic structure, namely, democracy, when explaining international cooperation, in this study we demonstrated that countries' domestic socio-legal structure significantly affects the preferred form of international cooperation. Civil law countries, which value written rules and certainty, use paper examinations as a core component of competency assessment of professionals. Hence, their preferred approach to international cooperation is international harmonization of paper examinations. In contrast, common law states regard track record as being important in assessing competence, and hence naturally, an emphasis is placed on the completion of coursework and survival in market competition. Their preferred approach to international cooperation is mutual recognition of foreign qualifications.

We examined these hypotheses using three case studies of regional cooperation projects on engineers in Asia. The APEC Engineer is a project that emphasizes the role of mutual recognition is led by countries with a common law background, and civil law states seem to keep some distance from it. The Asia Common Skill Standards for IT Engineers under ASEAN+3 established a common paper examination in Asia and the majority of participating countries have a civil law background. Interestingly enough, active parties in the former are inactive in the latter project (e.g., Malaysia and Singapore), while inactive parties in the former are active in the latter project (e.g., Japan and Vietnam). Countries that have moderate attitude towards the former also maintain moderate attitude towards the latter (e.g., Korea and Taiwan). The third case study on ASEAN Engineer is interesting because all ASEAN members are forced to participate on an equal footing basis due to the absence of an opt-out option, unlike in the first two cases. The ASEAN Engineer project has features of both harmonization, as preferred by civil law countries, and mutual recognition, as preferred by common law countries. There also seems to be a convergence of domestic qualification systems, as well as socio-legal structure in ASEAN member states, taking advantage of the strengths of both civil and common law systems. Common law countries in ASEAN start to recognize the value of paper examination and civil law countries start to rely on the evaluation based on track-record of engineers, especially foreign engineers.

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