

Nomos

Recognition of Graduated Engineers and Industrial Technical Engineers

A Public Clarification by Nomos, Rubí

From Rubí, the association **nomos**, founded to advance the democratization of technical, scientific, and legal knowledge for the improvement of human conditions and social well-being, seeks to contribute to legal and technical clarity on an essential matter: the coherence of Spain's professional engineering system and the rights of its engineers.

Regulated Professions, Not Merely Academic Degrees

The right to practice one's profession under current and just regulations is a fundamental right, not an institutional concession granted by a few with executive privilege.

Among its core missions, **nomos** - headquartered in Rubí (Spain) - was established to defend and promote technical and legal knowledge, enabling people to act with full dignity, within the mandate conferred by law, free from arbitrary restrictions, misinformation, or institutional disinformation.

Regrettably, as COGITI (Official College of Graduated Industrial Technical Engineers - Spain) explicitly warns, a persistent pattern exists: whether due to ignorance or institutional interests, such as the promotion of lucrative Master's programs in engineering, students and professionals are systematically misled into believing that:

“Either they hold no professional attributions, or those attributions apply only narrowly within their own specialty.”

This claim, which COGITI denounces as *“more than necessary to correct”*, is not only factually incorrect; it is dangerous. When professional practice is unjustly restricted:

- Legal certainty is eroded,
- Public trust in institutions is undermined,
- Citizens are denied access to fully qualified professions.

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Often, economic interests silence rights holders: young engineers and professionals, out of ignorance or fear, refrain from asserting their legitimate rights and fall prey to educational institutions that profit from promoting costly and unnecessary Master's degrees.

This is not an academic debate. It is a matter of professional justice, legal coherence, and public service.

Legal Foundation

Both current *Graduados en Ingeniería* (Bachelor's-level Engineering Graduates) and pre-Bologna *Ingenieros Técnicos Industriales* (Industrial Technical Engineers), across their specialties, Mechanical, Electrical, Industrial Chemical, Textile, and Industrial Electronics, exercise a profession regulated by law, not a mere academic qualification.

This profession is defined by Ley 12/1986, which grants “*full authority within the scope of one's respective technical specialty,*” and is confirmed by the official evaluation of the General State Administration, per the Agreement of the Unidad de Mercado Working Group (Ministry of Industry, 5 November 2024).

Critically, this agreement does not create new rights nor modify existing law, it affirms that these rights remain fully in force. In other words: the rights were already legally binding *before* 2024; the agreement merely ends interpretive ambiguity.

Horizontal vs. Vertical Attributions: A Key Distinction

Not all professional attributions belong exclusively to one specialty. The system rests on two types:

1. Horizontal Attributions

These are shared by *all* specialties, as they pertain to industrial safety in general, regardless of sector or application.

Examples:

- REBT (*Reglamento Electrotécnico para Baja Tensión* - Low-Voltage Electrotechnical Regulation),
- RPCI (Fire Protection),
- REP (*Reglamento de Equipos a Presión* - Pressure Equipment Regulation).

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According to the 2024 Unidad de Mercado Agreement, *all five specialties* of Industrial Technical Engineering have been officially evaluated as fully competent for such horizontal regulations, with no limitation.

This means: no specialty holds exclusive rights over REBT. It is a *horizontal* attribution - like fire prevention or chemical risk management - and carries no power or current restrictions.

2. Vertical Attributions

These relate to the *specific technical domain* of a given specialty — where quantitative restrictions *do* apply only when acting outside that domain.

Example (Electrical Specialty):

- Restrictions (e.g., ≤ 15 kV or ≤ 66 kV for distribution lines) are based on voltage, *not* power.
- Voltage is the primary hazard in electricity, *not* kW or HP.
- Since REBT is, *by legal definition*, low-voltage only ($\leq 1,000$ V AC / $\leq 1,500$ V DC), it falls entirely *outside* this vertical logic.

In short: at a given voltage, 186 kW is no less hazardous than 800 kW. REBT is defined by voltage, not power.

Why This Matters

For years, a mistaken interpretation has taken hold: the idea that “*attributions only correspond to one’s own specialty*”, a view COGITI itself condemns as urgently in need of correction.

This confusion:

- Erodes rights already established by law,
- Weakens legal certainty,
- Risks devaluing the training and competence of thousands of engineers and engineering graduates practicing with full legal capacity.

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Nomos as a Civic Voice

As a non-profit association based in Rubí and committed to the democratization of technical, scientific, and human rights knowledge, we consider it essential to:

- Disseminate the State's official interpretation of professional attributions,
- Promote coherence between regulation and institutional practice,
- Ensure that no professional is forced to prove what is already a legal right.

We offer collaboration with municipalities, associations, professional colleges, engineering schools, and public administrations, but above all, with affected professionals and students, to organize technical-legal workshops, produce accessible outreach materials (briefs, videos, talks), provide legal-technical support to those impacted by misinterpretation and disinformation.

“Technical clarity is not a luxury, it is a prerequisite for professional justice and industrial safety.”

For all the reasons stated, Nomos calls upon schools and professional colleges to correct their information and attribution practices.

It is a matter of justice.

Nomos, Association for the Democratization of Rights and Knowledge
Rubi, Spain - 2025

www.nomosassociation.com

Official Sources Cited:

- Ley 12/1986, 1 April
- Real Decreto 842/2002 (REBT)
- Agreement CUARTO, Grupo de Unidad de Mercado, 5/11/2024
- RD 2200/1995 (Industrial Safety Regulation)

Official evaluation table: industria.gob.es/Calidad-Industrial/unidaddemercado

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ATRIBUCIONES PROFESIONALES DE LAS TITULACIONES UNIVERSITARIAS HABILITANTES EN EL ÁMBITO DE LOS REGLAMENTOS DE SEGURIDAD INDUSTRIAL

Acuerdos adoptados											Mantiene vigencia
Profesión regulada	RPCI	RSCIEI	RSIF	REP	RAPQ	RBT	RAT/RLAT	RGAS	RPPL	RAE	
<i>Arquitecto Técnico</i> * Solo la dirección de obra de instalaciones fijas de un edificio, su equipamiento propio o elementos de urbanización adscritos al mismo.	SÍ*	SÍ*	NO	NO	NO	SÍ*	SÍ*	SÍ*	SÍ*	SÍ*	
<i>Ingeniero Técnico Aeronáutico</i> * Solo especialidad Aeropuertos	SÍ	SÍ	SÍ	SÍ	SÍ*	SÍ	SÍ	SÍ	SÍ	SÍ*	
<i>Ingeniero Técnico Agrícola</i> * Solo especialidad Industrias agrarias y alimentarias	SÍ*	SÍ*	SÍ*	SÍ*	SÍ	SÍ	SÍ	SÍ*	SÍ*	SÍ	
<i>Ingeniero Técnico Forestal</i> * Solo especialidad Industrias forestales	SÍ*	SÍ*	SÍ*	SÍ*	SÍ*	SÍ	SÍ	SÍ*	SÍ*	SÍ	
<i>Ingeniero Técnico Industrial</i> Especialidades											
Mecánica	SÍ	SÍ	SÍ	SÍ	SÍ*	SÍ	SÍ	SÍ	SÍ	SÍ	
Eléctrica	SÍ	SÍ	SÍ	SÍ	SÍ*	SÍ	SÍ	SÍ	SÍ	SÍ	
Química Industrial	SÍ	SÍ	SÍ	SÍ	SÍ	SÍ	SÍ	SÍ	SÍ	SÍ*	
Textil	SÍ	SÍ	SÍ	SÍ	SÍ	SÍ	SÍ	SÍ	SÍ	SÍ*	
Electrónica Industrial	SÍ	SÍ	SÍ	SÍ	SÍ*	SÍ	SÍ	SÍ	SÍ	SÍ*	
* Limitado a las industrias o instalaciones mecánicas, químicas o eléctricas cuya potencia no exceda de 250 HP y la tensión de 15 kV (16 kV) cuando las instalaciones se refieran a las líneas de distribución y subestaciones de energía eléctrica).											
<i>Ingeniero Técnico de Minas</i> Todas las especialidades	SÍ	SÍ	SÍ	SÍ	NO	SÍ	SÍ	SÍ	SÍ	NO	
<i>Ingeniero Técnico Naval</i> * Solo especialidad Propulsión y servicios del buque	SÍ	SÍ	SÍ	SÍ	NO	SÍ	SÍ	SÍ	SÍ	SÍ*	
<i>Ingeniero Técnico de Obras Públicas</i> * Solo especialidad Construcciones civiles	SÍ*	SÍ*	NO	NO	NO	SÍ	SÍ	SÍ*	SÍ*	SÍ*	
<i>Ingeniero Técnico de Telecomunicación</i> Todas las especialidades	NO	NO	NO	NO	NO	SÍ	SÍ	NO	NO	NO	
<i>Ingeniero Técnico en Topografía</i>	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	

FOURTH: Evaluation of the attributions of qualifying university degrees:
 Agreements adopted by the Market Unit Group - Industrial Safety [PDF] [280.91 KB]
 November 2024 Meeting

<https://industria.gob.es/Calidad-Industrial/unidaddemercado/Paginas/Grupo-de-Trabajo.aspx>

<https://cogiti.es/atribuciones-profesionales-itis/>

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