

MEMORANDUM OF POSITIONS & PROPOSALS FOR THE INSTITUTIONAL DIFFERENTIATION OF THE PROFESSION OF SHIATSU PRACTITIONERS

TO:

1. Ministry of National Economy and Finance

2. Ministry of Development

CC: Ministry of Health

Date: 6 July 2026

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SUBJECT: Clarifications regarding the scope of Article 79 of Government Gazette A' 64/28.04.2026 (new Article 412 of Law 4442/2016) and submission of proposals for the official and autonomous institutional recognition of the profession of Shiatsu Practitioners on the basis of the European ESCO framework.

Dear Sir/Madam,

Through this letter, the official professional body of Shiatsu Practitioners in Greece - the professional association "Hellenic Shiatsu Association" - wishes to bring to your attention certain necessary clarifications as well as specific, substantiated proposals, in light of the recent provisions published in Government Gazette, Issue A' 64/28.04.2026 (Articles 78-81), which amend Law 4442/2016 and introduce new operating requirements (Article 79 / new Article 412) for persons providing manual massage services.

The purpose of this memorandum is to clarify that the Shiatsu method does not fall within the scope of the above provision, and at the same time to request the opening of a dialogue for the official differentiation and autonomous registration of our field by the competent state authorities, in full alignment with European standards.

For the smooth classification of professions in the Greek labour market, we propose and request the following:

Scientific and Technical Distinction: Shiatsu is not Manual Massage

We point out that the practice of Shiatsu is fully differentiated from the concept and practice of "manual massage" regulated by Article 412.

- Manual massage, as taught and applied within the fields of aesthetics or physiotherapy, includes mechanical manipulations (compressions, effleurage, rubbing/friction) on bare skin, using oils or creams.
- Shiatsu is an autonomous, internationally recognised traditional Eastern bodywork practice for wellbeing. It emerged as a complete system in Japan in the early 20th century and bases its theory on Traditional Chinese and Japanese Medicine.

Shiatsu is therefore a practice that aims to safeguard and improve physical and mental wellbeing, activating the inherent healing potential present in every organism; touch and human contact play an important role in its effects. It is based exclusively on the application of steady pressure (acupressure)

with the thumbs, palms and elbows along the body's energy meridians, as well as on passive stretches. The session is carried out with the recipient fully clothed, on a special floor mat (futon), without the use of oils and without contact with bare skin.

- **Safety, Ethics and Cooperation Protocol with the Medical Community:** The practice of Shiatsu is governed by rules of professional ethics, which ensure that Shiatsu functions in a complementary and supportive manner, without ever interfering with or replacing conventional medical care.
- **No interference with medication:** Shiatsu Practitioners do not intervene in, modify, or express an opinion on the medication prescribed by the recipient's attending physician.
- **Recommendation to provide a medical opinion:** During the first session (case history intake), it is common practice to request a medical opinion. For example, in the case of musculoskeletal issues, an orthopaedic opinion is requested, while for psycho-emotional conditions, the corresponding opinion from a general practitioner or psychiatrist is requested.
- **Immediate referral to specialists:** In the context of body assessment, if the Shiatsu Practitioner identifies indications requiring further investigation, the recipient is referred to the appropriate physicians for the necessary clinical or imaging examinations.

It is therefore clear that the provisions concerning manual massage do not apply to and do not cover the subject matter of Shiatsu. In order to avoid interpretative confusion by inspection authorities, it is considered appropriate to expressly reflect this distinction through a relevant interpretative circular.

Furthermore, for a smooth transition of the market and in order to avoid an objective inability to comply, we specifically propose the following:

1. Need for Alignment with the European ESCO Classification

Educational Foundation and Institutional Recognition:

Our position regarding the need for clear institutional differentiation and autonomous recognition of Shiatsu in Greece is not based on a mere theoretical disagreement; it is founded on the high level, international standardisation and many years of professional education required for its practice. Shiatsu is not an empirical or short-term relaxation technique, but an integrated, autonomous system of body education and wellbeing with a strictly structured three-year training programme, which faithfully follows the European standards and specifications of the European Shiatsu Federation (ESF). This educational seriousness is the main criterion on the basis of which the European Commission has already distinguished and registered Shiatsu as an independent profession in the European labour market.

- **The European ESCO Classification and the Proposal for Adoption:** The need for official and distinct recognition of Shiatsu in Greece is substantiated by the official European Classification of Skills, Competences, Qualifications and Occupations of the European Commission (ESCO). Within the ESCO system, the profession of Shiatsu Practitioner is strictly registered, autonomous and fully distinct from that of physiotherapist, aesthetician or masseur, with its own independent skills and occupational profile. On this basis, we propose the full adoption and use of the European ESCO framework by Greek legislation, through the official specialty "Shiatsu Energy Therapist", based on occupation code 3255.5, as defined by the European Commission in English as "Shiatsu Practitioner" (https://esco.ec.europa.eu/el/classification/occupation_main). This specific specialty includes and fully clarifies the individual professional activities in the field of complementary applications and wellbeing.
- **Institutional harmonisation with the Europass system:** It should be noted that the relevant distinct categorisation already exists institutionally within the domestic framework through the Europass system in Greece. Therefore, when a European or Greek citizen is certified according to European standards, their digital profile displays an entirely lawful and existing profession under the aforementioned code 3255.5. However, there is a need for full practical correspondence and

application by all national administrative bodies, so that obstacles are not created to the free and smooth professional activity of practitioners.

- Framework for Professional Shiatsu Education according to European Standards: According to the official curriculum framework of the European Shiatsu Federation (ESF), as reflected in the document <https://europeanshiatsufederation.eu/wp-content/uploads/2024/04/ESF-Baseline-Curriculum.pdf>, professional education extends over a minimum period of 3 years. The curriculum comprehensively covers Shiatsu Practice (pressure techniques, meridians, tsubos, body posture/Hara), Eastern Medicine Theory (Zen Shiatsu, the 8 Principles and Zang Fu, the 5 Elements), Western Medicine taught by medical doctors (Anatomy, Physiology, Pathology), as well as Professional Issues and communication skills. The training is completed mandatorily with Clinical Practice in conditions that simulate a real session environment. Particular emphasis is placed on Continuing Professional Development (CPD), which is expressly recommended by the ESF after graduation; it constitutes an organised and documented process of continuous training, necessary for maintaining and upgrading professional competence in Shiatsu and for safeguarding the practitioner's level of quality.
- Recourse to the European Commission: There is both the possibility and the necessity to make recourse to the European Commission. Associations may submit a petition to the EU, arguing that Law 5297/2026 introduces unjustified horizontal restrictions that invalidate the European classification of professions (ESCO) and obstruct the functioning of the single European market.

2. Preventing Distortion of Labour Market Statistical Data (Big Data)

The ESCO system is used by public bodies, such as the Public Employment Service (DYPA), for the digital analysis of labour market needs and trends. Due to the lack of a specialised framework, Shiatsu Practitioners are forced to be classified under related but non-representative Activity Code Numbers (KAD). As a result, the Big Data collected by the European Union for Greece presents a fictitious picture, distorting the real mapping of professional trends in the field of holistic wellbeing.

3. Proposals for Official Differentiation by State Authorities

With a view to modernising the market and ensuring the proper registration of professions, we propose that the State use the existing European digital tools through the following actions:

- Establishment of a specialised Activity Code Number (KAD): We request that the Ministry of Finance and the Independent Authority for Public Revenue (AADE) create a distinct Activity Code Number for "Wellbeing Education Services by Shiatsu Practitioners", so that our activity is definitively disconnected from classical massage services.
- Examination of the inclusion of Shiatsu services under a VAT exemption regime: We request that the Ministry of National Economy and Finance and the Independent Authority for Public Revenue (AADE) examine the possibility of including services provided by certified Shiatsu Practitioners under a special VAT exemption regime, within the framework of institutional recognition and distinct professional registration of the field. This request is not raised as an equation of Shiatsu with a medical act, nor as a therapeutic claim, but as recognition of its particular nature as a complementary practice of physical wellbeing, support and self-care, applied by suitably trained professionals, with clear ethical rules and without replacing medical or paramedical care. Its possible tax differentiation would contribute to the correct representation of the profession, to the viability of Practitioners, to citizens' access to prevention, wellbeing and support services, as well as to the harmonisation of Greek practice with the distinct European registration of Shiatsu as an autonomous professional field. According to AADE, VAT-exempt transactions are provided for in Articles 22 to 29 of the VAT Code, while the exemptions include, among others, acts related to health and care. Therefore, we request the issuance of a relevant interpretative clarification or the provision of a special regulation for the field of Shiatsu Practitioners.

- Creation of National Certification through EOPPEP: We call upon the Ministry of Education and EOPPEP to initiate the national correspondence process using the ESCO codes for Shiatsu, for the institutional establishment of an autonomous state certification ("Certified Shiatsu Practitioner" - ESCO ID), which will define the minimum required education criteria on the basis of European standards.

4. Clinical, Research and Hospital Experience from the Application of Shiatsu

Shiatsu is surrounded by an organised framework of scientific research, observational studies and collaborations with hospital structures and medical personnel, both in Greece and at European level. The data presented below show that Shiatsu is applied with seriousness and responsibility as a complementary physical wellbeing practice, often in cooperation with medical and nursing staff.

a) Clinical experience from the application of Shiatsu at the Pain Clinic of Aretaieion University Hospital of Athens

We would like to bring to your attention that the practice of Shiatsu was applied from 2008 and for a number of years at the Pain Clinic of Aretaieion University Hospital of Athens by volunteer Shiatsu Practitioners, within the framework of a multifactorial and interdisciplinary approach to the management of chronic pain, as complementary support for patients with chronic pain and in cooperation with medical personnel.

The results of this application were presented at scientific conferences of the Hellenic Society of Palliative and Symptomatic Care of Cancer and Non-Cancer Patients (PARISYA) and the Greek Section of the European Society of Regional Anaesthesia and Pain Therapy (ESRA Hellas), as well as at the international conference ALGOS 2013, International Symposium of WIP (World Institute of Pain), and were published in the corresponding books of abstracts. According to the relevant presentations, the application of Shiatsu was associated with a reduction in the intensity, frequency and duration of pain, improved mobility, better sleep quality, reduced anxiety, improved mood and enhanced daily functioning for a significant number of patients.

This experience is not presented as a therapeutic claim or as a substitute for a medical act, but as an indication that Shiatsu has already been the subject of application, observation and scientific recording within a public university hospital in Greece. We believe that this specific experience can be used constructively within the framework of an institutional dialogue for the proper, distinct and responsible registration of our professional field.

<https://shiatsugr.gr/category/research/>

b) Voluntary application of Shiatsu at the Pain Clinic of Hippokrateio General Hospital of Athens

Similarly, significant experience in the application of Shiatsu was also recorded at the Pain Clinic of Hippokrateio General Hospital of Athens, where a team of Shiatsu Practitioners voluntarily offered sessions to patients, in cooperation with the medical and nursing personnel of the clinic. This action enabled patients of different ages and of diverse social and economic backgrounds, as well as with various forms of pain, to become acquainted with and receive Shiatsu free of charge within a public hospital environment.

During the period 2017-2020, a total of 977 Shiatsu sessions were carried out for 583 patients, 453 women and 130 men, aged 19 to 94. The main reasons for attendance concerned musculoskeletal pain, neuropathic pain, headaches, post-operative pain, cancer pain, rheumatoid arthritis, fibromyalgia and other chronic conditions.

According to the programme records, the majority of patients reported improvement in their symptoms, while in cases where sessions were repeated, the improvement appeared to be greater. Beyond symptom relief, patients frequently reported an increased sense of wellbeing, relaxation and support.

The same initiative also included the offering of short Shiatsu sessions to hospital staff, within the framework of the annual information activities of the Hellenic Shiatsu Association. The staff expressed their appreciation for the relief and relaxation offered by the method, highlighting the potential of Shiatsu to function supportively not only for patients, but also for healthcare professionals working in demanding care environments.

In this case as well, the reference is made with institutional caution, not as a claim of therapeutic substitution, but as documentation of an existing, organised and long-standing experience of applying Shiatsu in a public hospital, which highlights its value as a complementary practice of wellbeing, relief and support.

<https://shiatsugr.gr/omada-ethelonton-siatsoy-sto-ippokrateio-g-n-a/>

For your information and in support of the above, we attach the abstracts of the relevant scientific presentations delivered at medical conferences concerning the application of Shiatsu at the Pain Clinic of Aretaieion University Hospital of Athens and at the Pain Clinic of Hippokrateio General Hospital of Athens.

c) European research evidence for Shiatsu - University of Leeds, 2007

In addition to the Greek experience of applying Shiatsu within public hospital structures, it is worth taking into account the important European research record carried out by Andrew F. Long, at the School of Healthcare of the University of Leeds, entitled “The Effects and Experience of Shiatsu: A Cross-European Study”. The final report was published in December 2007 and constituted one of the first extensive, cross-national and prospective observational studies on the experience and effects of Shiatsu in Europe.

The study was conducted in three European countries - Austria, Spain and the United Kingdom - with the participation of 85 professional Shiatsu practitioners and 948 recipients. According to the published scientific work, participants reported improvement in the severity of their symptoms, particularly in issues related to the musculoskeletal system, anxiety/stress and low energy or fatigue. Changes in health behaviour were also reported, such as greater care for rest, relaxation, exercise and general self-care.

Of particular interest is that the same research work recorded a low rate of adverse events, while none of the participants who reported them discontinued Shiatsu. The findings of the study should not be interpreted as a claim of medical treatment or as a substitute for conventional medical care, but as a serious indication that Shiatsu, when practised by suitably trained professionals, can contribute supportively to the maintenance and strengthening of health behaviour, wellbeing and self-care.

This European evidence reinforces the need for institutional differentiation of Shiatsu from the general category of manual massage/massage and supports the need for its distinct professional registration, in accordance with European data, education standards and the true nature of its practice.

For the fuller information of the Administration and in support of the above, the full text of the European study The Effects and Experience of Shiatsu: A Cross-European Study, University of Leeds, 2007, may be found at the following link: <https://europeanshiatsufederation.eu/research/> and its summary in Greek is attached at the end of the present Memorandum.

5. European Record of Shiatsu Applications - Shiatsu Stories / European Shiatsu Federation

The European recording of Shiatsu applications through the Shiatsu Stories platform is also significant. The platform operates with the support of the European Shiatsu Federation. The European Shiatsu Federation (ESF) is the European federation that promotes Shiatsu as an independent, self-regulated practice of care and wellbeing in Europe, with the central aim of promoting high professional standards in the practice of Shiatsu. It consists of eleven (11) member countries.

<https://europeanshiatsufederation.eu/members/>

The ESF supports national professional associations, works for the institutional recognition of the right to practise Shiatsu in Europe, and promotes education, research and the mutual recognition of professionals, teachers and schools among member states.

The Shiatsu Stories platform gathers experiences, data and examples of Shiatsu application from different European countries and fields, such as hospitals, palliative care, care for patients with cancer, mental health, neurodiversity, children, care structures and empowerment programmes. Its purpose is to collect and summarise information on how and where Shiatsu practitioners have successfully introduced the practice into different social and professional environments.

<https://shiatsuresources.net/shiatsu-stories/>

The existence of this European platform demonstrates that Shiatsu is not an undifferentiated form of manual massage, but a distinct field of complementary care and wellbeing, with applications in various contexts of human support. This record can be used as an additional element supporting the need for institutional differentiation of Shiatsu in Greece, corresponding to the European reality and to its already existing professional recognition at European level.

6. World Health Organization Reference

The World Health Organization, in the WHO Global Report on Traditional and Complementary Medicine 2019, recognises Traditional and Complementary Medicine as an important field of public health, with increasing institutional recognition internationally. Practices based on holistic approaches to the human being and on supporting the body's natural self-regulation, such as Shiatsu, belong to the same broader field.

<https://www.who.int/publications/i/item/978924151536>

Summary:

The professional Shiatsu association "Hellenic Shiatsu Association" clarifies that the provisions of the new Article 412 concerning manual massage do not apply to our practice, as the techniques and the framework of their application are fundamentally different.

Nevertheless, on the occasion of the reform of Law 4442/2016, we consider cooperation with the State to be timely and necessary for the official, autonomous and distinct registration of our profession by the state authorities.

We remain at your disposal for the provision of any technical and scientific documentation in this direction.

Yours sincerely,

The Board of Directors of the Hellenic Shiatsu Association