

Introducing a European disability card and a European parking card

Impact assessment (SWD(2023) 290, SWD(2023) 291 (summary)) accompanying a Commission proposal for a directive of the European Parliament and of the Council establishing the European disability card and the European parking card for persons with disabilities, COM(2023) 512.

This briefing provides an initial analysis of the strengths and weaknesses of the European Commission's [impact assessment](#) (IA) accompanying the above-mentioned [proposal](#), submitted by the Commission on 6 September 2023 and referred to the European Parliament's Committee on Employment and Social Affairs (EMPL). The purpose of the proposed directive is to enhance free movement – a key element of Union citizenship – for persons with disabilities, by facilitating cross-border access to services and facilities, including preferential conditions (e.g. reduced fees). The initiative proposes to establish a legal framework for

- a **European disability card**, serving as EU-wide proof of a recognised disability status and granting cardholders equal access to special conditions and preferential treatments (applicable to public transport, cultural events and museums, leisure and sports centres, etc.);
- and a **European parking card** for persons with disabilities, guaranteeing the use of parking spaces and facilities reserved for persons with disabilities in all EU countries, and preferential conditions (such as extended or free parking, or reduced fees).

A key component of the proposed initiative is mutual recognition of disability status across the EU. The proposal puts forward rules, common conditions and common standardised models for both cards, with the overall aim that cardholders – whose disability status has been recognised by the competent authorities in their Member State of residence, in accordance with national rules – are granted special conditions or preferential treatment on equal terms and conditions with residents of the host Member State. It builds on the experience gained from two instruments already in place: (i) the EU disability card pilot project rolled out in eight participating Member States since 2016¹ and (ii) the EU parking card for people with disabilities, introduced EU-wide in 1998 through [Council Recommendation 98/376/EC](#).²

The proposal for a disability card – one of the flagship initiatives of the [European disability strategy for 2021 to 2030](#) – is included in the Commission's 2023 [work programme](#) and the [joint declaration](#) on legislative priorities for the years 2023 to 2024. It responds to longstanding calls from organisations of persons with disabilities (OPDs)³ and the European Parliament,⁴ and takes the [exploratory opinion](#)⁵ of the European Economic and Social Committee (EESC) of April 2023 into account. The personal scope of the proposed initiative is limited to EU citizens. Notwithstanding, on 31 October 2023, the Commission submitted an additional [proposal](#) for a directive extending the EU disability card and the parking card to third-country nationals who are legally residing in an EU Member State. This follow-up proposal (COM(2023) 698) is based on Article 79(2)(b) Treaty on the Functioning of the European Union (TFEU).⁶



Problem definition

The IA adequately presents the problems at stake, their underlying drivers and the ensuing consequences for different categories of stakeholders, namely (i) persons with disabilities and their families, (ii) public authorities, and (iii) service providers. It duly underpins the problem definition with evidence obtained from relevant stakeholders, specific Commission data and desk research.

The initiative seeks to address **two specific problems** that persons with disabilities often encounter when travelling within the EU and when trying to access preferential conditions:

- 1 Access to preferential conditions (monetary or in kind) can be hampered, as service providers in other Member States may not recognise the disability status.
- 2 Persons with disabilities face hurdles and costs (e.g. fines) when travelling by car in other Member States, as the current EU parking card is not always recognised.

According to the IA, these problems are driven by two factors: firstly, national divergences in the implementation of the existing EU parking card for persons with disabilities and the card's voluntary nature; and secondly, limited acceptance across the EU of national disability cards and certificates of non-residents issued by other Member States. The latter is closely related to service providers' insufficient awareness of different national disability cards and the fact that the scheme in place is voluntary and limited to eight Member States. These difficulties, alongside with high travel expenses, can discourage many persons with disabilities from travelling abroad (IA, p. 6).

Consequently, persons with disabilities encounter practical difficulties in exercising their freedom of movement. The IA seeks to establish how many people are affected. According to Eurostat estimates, around 25 % of the EU population have some form of disability (IA, p. 1). EU-wide, some 30 million people are living with a nationally recognised disability, meaning they are in possession of a national disability card or certificate, of which nearly 20 million are believed to have travelled abroad in the reference year – 2019 (IA, pp. 3-4). The IA is transparent about the assumptions made, their sources and data gaps (see also the section on Supporting data and analytical methods used).

Subsidiarity / proportionality

The IA recommends basing the proposed directive on **Articles 53(1), 62, 91 and 21(2) TFEU**; the multiple legal base is deemed necessary to meet the initiative's objectives (IA, pp. 13-14). Articles [53](#) and [62](#) TFEU relate to services in the internal market, Article [91](#) TFEU applies to transport policy (including parking facilities), and Article [21\(2\)](#) TFEU empowers the EU to adopt legislation regarding the right of free movement, in the framework of non-discrimination and Union citizenship.

The IA argues that EU-level action is necessary because of the cross-border dimension of the issue at stake. It highlights the EU added value of introducing a mutually recognised instrument (i.e. the disability and parking cards) to facilitate the free movement of persons with disabilities and their enhanced participation in cultural and leisure activities in other Member States. In compliance with the subsidiarity principle, the initiative does not seek to harmonise how Member States assess and recognise disabilities – this would remain a national competence. A [subsidiarity grid](#), which typically accompanies sensitive or important initiatives in policy areas of shared competence (Better Regulation Guidelines – BRG – tool #5), is attached to the proposal. With regard to **proportionality**, the IA maintains that none of the policy options proposed would go beyond what is necessary to achieve the objectives (IA, p. 24).

The [subsidiarity deadline](#) for **national parliaments** expired on 14 November 2023. While no national parliament issued a reasoned opinion, the [Danish Folketing](#) and the [German Bundesrat](#) voiced concerns in the framework of the political dialogue. The Folketing insisted that no further entitlements should be added to the proposal, and that neither social provisions nor labour market schemes should be addressed. The Bundesrat requested a definition, for the sake of legal clarity, of the concept of short-term stay and cautioned that the proposal might discriminate against nationals

of a Member State compared with nationals coming from Member States with lower thresholds for disability recognition.

Objectives of the initiative

The IA identifies one general and two specific objectives, which are briefly outlined, though without entering into much detail (IA, pp. 15-16). The **general objective** is to facilitate the free movement and equal access to services for persons with disabilities within the EU, ensuring that visitors and residents are treated equally. Consequently, holders of the European disability and parking cards travelling abroad (within the EU) would be entitled to the same preferential conditions that are granted to persons with disabilities residing in the host Member State. The IA stresses that the scope of this objective is limited to the EU-wide recognition of a disability status for the purpose of accessing services across the EU. Thus, it would not cover any issues relating to social security or social protection, the latter falling under national competence. Therefore, the European disability card would complement but not replace national disability cards and certificates.

To address the problems identified, the IA defines two **specific objectives** (SOs), which are, however, rather general in nature.

SO 1 Facilitating the mutual recognition of disability status for persons with disabilities travelling to or visiting another Member State, in relation to accessing services

SO 2 Facilitating the use and legal certainty of the EU parking card for persons with disabilities

The specific objectives are broken down into eight **operational objectives** defining concrete deliverables or policy actions. The operational objectives appear to be relevant and meet the S.M.A.R.T. criteria of being specific, measurable, achievable, realistic and time-bound (BRG, tool #15). They are, in accordance with the BRG (tool #15), outlined in the section dealing with monitoring and evaluation, which is part of Annex 7 (pp. 174-176).

The IA notes that the specific objectives of the present initiative contribute to implementing the [2021-2030 European disability strategy](#); and the [European Pillar of Social Rights](#)⁷ (EPSR), in particular principles 3: equal opportunities and 17: inclusion of people with disabilities (IA, pp. 1 and 16); and the [UN Convention for Persons with Disabilities](#) (UN CRPD).

Range of options considered

To achieve the objectives set, the IA identifies **two policy options** (POs) for each of the specific objectives, in addition to the baseline scenario. The options are described in a clear and balanced manner, and appear to be realistic alternatives.

Under the well-substantiated **baseline scenario**, the IA assesses how the situation would evolve without any policy intervention. Basically, the current EU parking card (based on the 1998 Council recommendation, which is by nature a non-binding instrument) would remain in place, with all its divergences in national implementation, together with the voluntary disability card system rolled out in a mere eight EU Member States. While other Member States could potentially join the pilot EU disability card, according to the IA, only Croatia ever considered this option. The IA provides slightly incoherent data regarding the number of disability cards issued under the pilot scheme: p. 27 indicates 190 000 cards, whereas the corresponding table (IA, pp. 24-25), providing data for six of the eight Member States concerned (without Estonia and Italy), suggests 252 000. The IA expects the current shortcomings (i.e. gaps in material and territorial scope and fragmented implementation) to persist under the baseline scenario, or even widen in light of technical and digital developments and the EU's ageing society (IA, p. 11).

To achieve **SO 1**, the IA proposes a **mandatory European disability card** (modelled on other existing EU-wide cards with security features)⁸ for cross-border travel and/or visiting purposes. It would provide for EU-wide mutual recognition of the disability status granted by a person's Member State of residence, but without harmonising the disability assessment criteria and procedures (these

would remain a national competence). It would entitle cardholders (and accompanying persons, such as personal assistants) to enjoy the same preferential conditions service providers in any given Member State offer to their residents with disabilities. The disability card would be subject to minimum common rules and conditions for its issuance and application, including minimum security features, and be issued in in **digital and physical format**. The card's scope would either be limited to the culture, leisure, sport and transport sectors (i.e. the sectors covered by the current pilot project) (**PO A1**), or apply to all service sectors (**PO A2**).

Accompanying measures would include accessible national websites providing information on the disability card (e.g. eligibility, administrative procedures, preferential conditions available in that Member State, etc.), a dedicated section on the [Your Europe Portal](#), and an EU-wide awareness-raising campaign. Importantly, the **European disability card would complement, but not replace national disability cards or certificates**.

To achieve **SO 2**, the IA proposes **modifications to the current EU parking card**. Under **PO B1**, the existing parking card would be enhanced or reinforced, but remain **voluntary**. Security features (to prevent fraud and forgery) would be enhanced through an amendment of Annex I of the Council recommendation. The Commission would support the card's implementation and coordination between Member States by means of common EU guidelines concerning the establishment of national databases of cardholders, and accessible public information at national or local level regarding practicalities. Under **PO B2**, the EU parking card model would become **mandatory**. The current Council recommendation would be repealed, and **new EU parking cards would replace** existing national parking cards. Establishing eligibility criteria and determining parking rights would remain under Member States' competence. As under PO B1, Member States would be required to set up national databases on cardholders and the validity of parking cards, which would be accessible to enforcement authorities. Furthermore, Member States would be responsible for maintaining accessible websites with information on the parking card (e.g. how to obtain the card, how to use it, which rights are associated, etc.). As an accompanying measure for POs B1 and B2, the Your Europe portal would provide links to national or local websites covering the rights associated with the EU parking cards.

The IA is transparent about the policy options discarded at an early stage, seven in total, one of them being the merger of the EU parking card and the new EU disability card (IA, pp. 20-22). Moreover, it analyses stakeholders' views on the different policy options (IA, pp. 23-24).

Table 1 – Policy options assessed in the IA

| Specific objective | Policy option 1 | Policy option 2 |
|--|--|---|
| SO A: Facilitating the mutual recognition of disability status | Mandatory European disability card model for <u>selected</u> service sectors | Mandatory European disability card model for <u>all</u> service sectors |
| | Accompanying measures | |
| SO B: Facilitating the use and legal certainty of the EU parking card | Enhanced/reinforced voluntary EU parking card | Mandatory EU parking card model |
| | Accompanying measures | |

Source: Author, based on IA, pp. 17-20. N.B.: elements constituting the preferred PO are highlighted in blue.

Assessment of impacts

In addition to social, economic and environmental impacts, the IA examines also digital impacts, impacts on fundamental rights and impacts on competitiveness and SMEs of all policy options and the baseline scenario (IA, pp. 25-41). Costs and benefits are assessed qualitatively and, whenever possible, they are quantified and monetised, with the underlying criteria and calculation methods

described in Annexes 3 and 4 of the IA. A comparative overview of impacts in Annex 8 includes additional quantifications. In general, the IA is transparent about uncertainties in the assumptions, stemming from data gaps (e.g. data on preferential conditions granted to persons with disabilities).

Social impacts: the IA notes that under POs A1 and A2, more persons with disabilities are expected to travel to other Member States by 2030. The IA refers in this context to a 'travel gap reduction', which is more favourable under PO A2 (further substantiated in Annexes 8 and 9). The introduction of a binding EU-wide disability card would significantly decrease uncertainty for persons with disabilities linked to access to preferential conditions and mutual acceptance of disability status. POs A1 and A2 are expected to increase the take-up of cultural, leisure and sports activities and transport for persons with disabilities. In parallel, more service providers would offer preferential conditions to non-residents if a uniform, EU-wide disability card existed. Similarly, PO B1 and B2 are expected to have positive impacts, with the impact under the mandatory PO B2 being larger.

All POs impact positively on **fundamental rights**, in particular on the freedom of movement (Article 45 EU [Charter of Fundamental Rights](#) (CFEU)), integration of persons with disabilities (Article 26 CFEU and in line with the UN CRPD), and non-discrimination (Article 21 CFEU).

In terms of **economic impacts**, both options A1 and A2 would create benefits for persons with disabilities, notably cost savings (their scale being higher under PO A2, as it covers more sectors), which, however, translate into costs for service providers. On the latter point, service providers reported that offering preferential conditions generates only small costs, as the target group currently represents a very small share of their client base (1 % under the baseline, according to IA, p. 28). Moreover, these costs would be offset by increased turnover from the higher number of persons with disabilities travelling, and notably persons travelling with them who are not entitled to reductions.

The IA also highlights that the new uniform disability card would make it easier for service providers to check (and accept) the disability status. Service providers would incur administrative costs linked to the reporting of the preferential conditions offered. With regard to the EU parking card (POs B1 and B2), persons with disabilities would save costs through reduced tariffs and avoided fines. The IA also notes wider macroeconomic benefits for the **accessible tourism market** under all policy options, which would be the highest under POs A2 and B2.

For **national public authorities**, the costs incurred under POs A1 and A2 (quantified) are expected to be the same, arising from producing and delivering disability cards, building digital systems for a digital disability card, maintaining websites and organising awareness campaigns. For the parking card (POs B1 and B2), public authorities could expect benefits from reduced enforcement costs (difficult to quantify), by means of national cardholder databases. The rollout of the new cards would entail minor adjustment costs, estimated to be lower under the voluntary scheme (PO B1).

Under all POs, the **environmental impacts** are deemed negligible, but they would be slightly negative under POs B1 and B2, owing to increased travel by car. The IA does not address the 'do no significant harm' principle.

Following comparison of the different options against the baseline (for the criteria of effectiveness, efficiency, coherence, and subsidiarity and proportionality), the **combination of POs A2 and B2** emerges as the **preferred option**. Monetised estimates of benefits and costs are provided on p. 45 of the IA. The preferred option appears to enjoy broad support across stakeholder groups.

The IA substantiates in detail how the preferred option would contribute to the achievement of the United Nations **Sustainable Development Goals (SDGs)** (IA, pp. 94-96). According to the IA, it would contribute to SDG #8 (decent work and economic growth; in particular in terms of promoting sustainable tourism), SDG #10 (reduced inequalities), SDG #11 (sustainable cities and communities; in particular with regard to transport); and SDG #6 (peace, justice and strong institutions; with specific regard to promoting and enforcing non-discriminatory laws and policies).

SMEs/ competitiveness

Although the preferred policy option is not expected to have significant impacts on competitiveness nor on SMEs, the IA features both an **SME test** (IA, pp. 96-97) and a **competitiveness check** (Annex 5; IA, pp. 134-136). The IA notes that both the European disability card and the parking card would positively affect the **market for accessible tourism** and leisure/culture sectors in Europe, sectors where SMEs are prevalent. However, the overall impact 'is likely to be very small in magnitude due to the relatively small number of cardholders compared to the number of persons with disabilities and the total EU population travelling' (IA, p. 41). Backed by stakeholder feedback from SMEs and larger companies, the IA expects the direct cost of offering preferential conditions to customers with disabilities to be minor, and potentially offset by higher turnover resulting from the fact that persons with disabilities are typically accompanied by paying customers (family and friends). According to a targeted survey, service providers (including SMEs) believe that the introduction of the European disability card would simplify the process of checking the disability status of customers from other Member States (IA, p. 38). Costs and benefits under the preferred option are broken down, further detailed and quantified – whenever possible – in Annex 3 together with a table detailing the impacts of the measure on competitiveness and SMEs. An overview table for all options is added in Annex 8.

Simplification and other regulatory implications

The proposed directive would establish the European disability card and the parking card as legally binding instruments. This was welcomed as progress by many stakeholders, including OPDs, and responds to a request by the European Parliament.⁹ Nonetheless, the [EESC](#) and the [European Disability Forum](#) (EDF) would have preferred a regulation to a directive. Academic Delia Ferri argues that splitting the legislative procedure for the two cards would have allowed the establishment of the European parking card through a regulation, on the basis of Article 91 TFEU, and thus provided for enhanced harmonisation of rules and legal certainty.¹⁰ Conversely, one of the legal bases being Article 53 TFEU, and for respect of the subsidiarity principle, the disability card would in any case necessitate a directive. Ferri however concedes that a directive is the instrument that is 'most respectful of the principle of subsidiarity'. The IA would have benefited from an in-depth discussion regarding the choice of legal instrument.

With regard to regulatory offsetting (**one in, one out**), the expected administrative costs for businesses would be marginal (IA, p. 47). The IA assumes costs and benefits for service providers: while they might need to bear the costs of reduced income (e.g. through preferential conditions granted), the initiative would entice more persons with disabilities to travel, and therefore raise the overall return for the businesses concerned (IA, p. 47).

Monitoring and evaluation

Annex 7 of the IA outlines how the application and enforcement of the proposed initiative would be monitored, to track progress towards the defined objectives (IA, pp. 174-176). It puts forward 15 seemingly relevant indicators that would allow the performance of the disability and parking cards to be measured, broken down by operational objectives. The table also indicates how the data would be collected, although on this point, some elements do not seem to correspond across columns. Moreover, the IA is transparent about the fact that some of the indicators 'may require the design of new data collection mechanisms or the integration of existing EU surveys, such as EU-SILC' (IA, p. 176). The IA suggests evaluating the initiative 5 years after its entry into force, taking into account a transposition period of 18 months (IA, p. 48).

Stakeholder consultation

As required by the BRG, Annex 2 (IA, pp. 52-86) provides a detailed account of all stakeholder consultation activities the Commission undertook to inform the initiative, broken down by different groups of stakeholders. Overall, the consultations appear **comprehensive and inclusive**,

complying with the CRPD obligation to involve OPDs ([Article 4\(3\)](#)) and inclusive good practices set out in the BRG (tools #52 and #55). To gain an understanding of existing obstacles for persons with disabilities in relation to cross-border mobility, and of the different stakeholders' views on the initiative, the Commission consulted

- those having an interest in the matter (e.g. national public authorities,¹¹ service providers, non-government organisations (NGOs));
- potential beneficiaries of the European disability card and the European parking card (persons with disabilities, personal assistants);
- experts (including researchers, consultancies, advisors, international organisations); and
- the [Disability Platform](#).¹²

The **call for evidence**, run between 23 November 2022 and 9 January 2023, yielded 272 replies from different stakeholder groups, expressing strong support for a legally binding, mutually recognised European disability card. An **open public consultation** followed from 16 February 2023 to 5 May 2023, thus meeting the default 12-week BRG requirement. In addition to the 'usual' questionnaire on the 'Have your say' portal (1 204 replies), the Commission successfully solicited input through **accessible formats**, in particular an easy-to-read format via EU Survey (2 135 replies) and an accessible Word document via email (22 replies). The IA reports that 78 % of respondents were persons with disabilities, most of them with a recognised disability (IA, p. 55).

Additional **targeted consultations** sought to broaden the evidence base. These included interviews, as well as targeted online surveys addressed to national competent authorities, persons with disabilities, national and EU-level civil society organisations and service provider associations. As the response rate to the online surveys was low (IA, p. 56), the Commission also held three online workshops and six focus group meetings. Finally, six case studies (Belgium, France, Italy, Austria, Romania and Finland) helped to gain insights into the different national models and experiences regarding the implementation of the European parking card. In addition, some Member States and regions gave their input by means of position papers, all of them insisting that the definition, assessment and recognition of disability should remain a national competence (IA, pp. 81-86).

There was a strong stakeholder consensus for:

- making the EU disability card a legally binding instrument;
- providing automatic entitlement for holders of a national disability card;
- keeping the disability card and the parking card separate instruments (given their difference in scope and eligibility criteria, as well as the need to be able to use both cards simultaneously); and
- the need to issue the cards in both, digital and physical format.

Stakeholder views appear to have been considered throughout the IA. Annex 3 of the IA describes the expected impacts of the preferred option on different stakeholder groups in greater detail.

Supporting data and analytical methods used

In addition to feedback from stakeholders (including disability organisations) and Member States, the IA draws on a wide range of information and data sources, in particular on a dedicated supporting study, to which it includes numerous references, but no hyperlink. This study is cited in a footnote as a 'Study supporting the Impact assessment of an EU initiative introducing the European Disability Card, prepared by EY, Valdani, Vicari & Associati (VVA), Open Evidence and FBK-IRVAPP', but it does not seem to be publicly accessible (at the time of writing). Other studies that substantially informed the IA include an external [study](#) of May 2021 assessing the implementation of the pilot action on the EU disability card, and a topical [study](#) from November 2022 contracted out by the European Parliament.

Analytical methods used include **multi-criteria decision analysis** (BRG, Tool #62) and **cost-effectiveness analysis**. The latter draws upon monetised information concerning costs and

quantitative and/or qualitative information on benefits, using both primary and secondary data. The IA reasons that for a cost-benefit analysis, 'many of the benefits of the policy options would indeed be complex to monetise, and monetisation itself would often require unrealistic assumptions' (IA, p. 101).

Follow-up to the opinion of the Commission Regulatory Scrutiny Board

Following the examination of a draft version of the IA, the Regulatory Scrutiny Board (RSB) issued a positive [opinion](#) with reservations on 19 July 2023. The RSB required, inter alia,

- clarification of Member States' views and support for the initiative, and the need for EU legislative action;
- clarification and assessment of the impacts, costs and benefits for national administrations and public authorities, including local and regional public institutions;
- better presentation and integration of the available cost and benefit estimates within the efficiency and effectiveness assessment when comparing the options;
- revision of the 'one in, one out' section; and
- a review of the competitiveness check (Annex 5) to better explain the impacts on the market for accessible tourism.

Judging from the text of the final IA and the mandatory summary table in Annex 1 (IA, pp. 50-52), it appears that the issues raised by the RSB were adequately addressed. Only the 'one in, one out' section remained purely qualitative (IA, pp. 47-48).

Coherence between the Commission's legislative proposal and IA

The proposed directive appears broadly to follow the IA. However, minor differences exist regarding the scope. While the IA's preferred option suggests extending the scope of the European disability card to 'all service sectors', the proposal specifies that the card should apply to 'services within the meaning of Article 57 TFEU'. Furthermore, according to Recital 29 of the proposal's preamble, the disability and parking cards 'should also be available to workers who travel to or visit another Member State for work-related purposes'. This aspect does not appear to be covered in the IA. Moreover, the proposal empowers the Commission to adopt delegated and implementing acts (e.g. to determine the requirements and technical specifications of the disability and parking cards). While the IA mentions these measures, it does not include any reference to comitology procedures. Finally, with regard to review clauses, the IA suggests evaluating the initiative 5 years after its entry into force, taking into account a transposition period of 18 months, whereas Article 16(1) of the proposal requires the Commission to report on the application of the Directive, first 3 years after the date of application, and then every 5 years.

The IA supporting the proposal for a European disability card and a European parking card builds on the experience of two instruments already in place: i) the EU disability card pilot project rolled out in eight participating Member States since 2016, and ii) the EU parking card for persons with disabilities, introduced EU-wide in 1998 through Council Recommendation 98/376/EC. The IA draws on a wide range of data, including a supporting study (which, however, is not linked and does not seem to have been published) and a recent study assessing the implementation of the disability card pilot project. The IA presents a clear and comprehensive intervention logic. It puts forward two policy options in addition to the baseline scenario, duly analysing the potential impacts, with a focus on social, fundamental rights and economic impacts. Stakeholder input was taken into account throughout the IA. Disability organisations were involved in the consultations; in addition, in line with the UN CRPD and the BRG, the open public consultation included accessible formats (e.g. a questionnaire in easy-to-read format). The legislative proposal broadly follows the IA, with some minor differences regarding the scope, delegated acts and review clauses.

ENDNOTES

- ¹ The EU disability card pilot project has its origin in a call for proposals the Commission launched in 2015 under the 2014-2020 Rights, Equality and Citizenship programme. Between 2016 and 2018, eight Member States – Belgium, Estonia, Italy, Cyprus, Malta, Romania, Slovenia and Finland – launched pilot projects to support voluntary mutual recognition of disability status in the leisure, culture, sports and transport sectors. While adhering to some common core principles, the national projects feature major differences. They remained in place after the end of the project. See M. Priestley, [Disability assessment, mutual recognition and the EU Disability Card – Progress and opportunities](#), Policy Department C, European Parliament, November 2022, pp. 69-75, and D. Ferri, [Analysis of the European Disability Card: The proposed directive: shortcomings, strengths and opportunities](#), Policy Department C, European Parliament, November 2023, pp. 20-22.
- ² Amended in 2008 through [Council Recommendation 2008/205/EC](#), following enlargement.
- ³ See M. Priestley, p. 67.
- ⁴ In particular in its resolutions adopted on [13 December 2022](#) on equal rights for persons with disabilities; [10 March 2022](#), on the 2020 EU citizenship report; [7 October 2021](#) on the protection of persons with disabilities through petitions; and [18 June 2020](#) on the European Disability Strategy post-2020.
- ⁵ The EESC prepares exploratory opinions to provide input to Commission proposals, enabling organised civil society represented within the EESC to express their views. See EESC, [The EESC in the interinstitutional framework](#), 2022.
- ⁶ The follow-up proposal was announced in the present IA, p. 5. Within the European Parliament, this proposal was referred to the Committee on Civil Liberties, Justice and Home Affairs (LIBE).
- ⁷ The [European Pillar of Social Rights](#), proclaimed at the Gothenburg Social Summit in November 2017, sets out 20 principles for a strong social Europe. These principles are centred around the following three priorities: (i) equal opportunities and access to the labour market; (ii) fair working conditions; and (iii) social protection and inclusion.
- ⁸ The IA cites the European Health Insurance Card, the Community model for national driving licences and the European Student Card as examples (IA, p. 17).
- ⁹ Resolution of [13 December 2022](#) on equal rights for persons with disabilities, point 56.
- ¹⁰ See Ferri, pp. 50-55.
- ¹¹ Authorities in EU Member States at the national and sub-national level were generally supportive of the initiative, see C. Collova and M. Lecerf, [European Disability Card – Pre-legislative synthesis of national, regional and local positions on the European Commission's initiative](#), EPRS, European Parliament, September 2023.
- ¹² The Disability Platform was set up in 2021 by a [Commission decision](#), as an expert body to support and advise on the implementation of the EU disability strategy. It replaces the former High Level Group on Disability.

DISCLAIMER AND COPYRIGHT

This document is prepared for, and addressed to, the Members and staff of the European Parliament as background material to assist them in their parliamentary work. The content of the document is the sole responsibility of its author(s) and any opinions expressed herein should not be taken to represent an official position of the Parliament.

Reproduction and translation for non-commercial purposes are authorised, provided the source is acknowledged and the European Parliament is given prior notice and sent a copy.

© European Union, 2023.

eprs@ep.europa.eu (contact)

www.eprs.ep.parl.union.eu (intranet)

www.europarl.europa.eu/thinktank (internet)

<http://epthinktank.eu> (blog)