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# EBU Focus Number thirteen, June 2021.

# The EU Disability Card

### Polish, Serbian and Turkish versions available!

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## The EU Disability Card – History and Background

By **Antoine Fobe**, EBU Head of Campaigning

In February 2016, the European Commission launched a pilot project of an EU Disability Card. The aim of the project is to help people with disabilities travel more easily between EU countries, by developing a voluntary system of mutual recognition of disability status and some associated benefits based on an EU Disability Card – hereafter the “Card”. The Card ensures equal access to benefits across borders for people with disabilities, mainly in the areas of culture, leisure, sport and transport. The card is mutually recognised between those EU countries that participate in the project, on a voluntary basis. In October 2017, eight EU Member States had joined the pilot project: Belgium, Cyprus, Estonia, Finland, Italy, Malta, Romania and Slovenia.

The Card does not harmonise national eligibility criteria or rules. Member States retain their discretion to decide who is eligible to receive the Card, using the national definition of disability, and to determine the issuing procedure. In order to get a Card, you need to have a recognised disability status in one of the participating Member States; and it is for the government agency responsible for disability in your home country or region to deliver you the Card. Specific web portals have been developed for each of the eight participating countries, to inform and guide concerned citizens. See the relevant section of the [website of the European Commission](http://ec.europa.eu/social/main.jsp?catId=1139&langId=en)’s Directorate General for Employment and Social Affairs.

Even within the limited geographical scope of eight of the 27 EU Member States, most of which relatively small in size and population, the Card’s practical interest is limited by the following facts:

* Its material scope may vary from participating countries, with one country only looking at culture and sports for instance, whereas another country may also cover transport, or possibly even the purchase of some products; and
* The concerned service providers – those with which one is seeking to have one’s disability status recognised, e.g. a museum or transport company – in each participating country are free to join the EU Disability Card system as partners, or not.

This means that the Card may have interest for a given service in one participating country but not in another, and one needs to find out in advance, country per country and per type of service. Moreover, the advantages offered for card holders for a determined service may vary from one participating country to another, and evolve in time. The dedicated national portals provide information ahead of a planned trip or stay in another EU country, but they are not always sufficiently up-to-date.

Besides, when joining the system, participating countries can choose between 2 versions of the Card, i.e. with or without the letter A in the right-hand corner. Only letter A cards also grant reductions and other benefits to the personal assistants of the Card holder. This leads to confusion where a letter A card holder travels to a country which releases cards without the letter A, or vice versa.

More importantly, the pilot project is disappointing for mobile citizens with disabilities, but also interesting from a policy-making perspective, in that it highlights the current gaps in EU law through what the Card does NOT do. We already said that it does not bring harmonisation of the national rules on disability status or on eligibility to benefits – and we don’t argue with that. What is more problematic and frankly disappointing for citizens with disabilities, is that:

* The Card only proves that one has a recognized disability status in one’s country of origin, and it does not entitle you to have your disability status recognised in the host country; and
* The Card does not either, by itself, entitle you to the same reductions or benefits as nationals of the host country, since the participation of service providers in a participating country is on a voluntary basis.

If only because of these important limitations, the Card, as it stands in the pilot project, only has a very limited impact toward improving the freedom of movement of persons with disabilities in the EU.

Well aware of the limitations, the European Commission has started in 2019 to assess the pilot project. External consultants were entrusted with the task of delivering an assessment study with the aim to provide a comprehensive and concise review, analysis and assessment of the implementation of the pilot project, to facilitate the possible wider implementation of the Card in the EU.

In its Communication of 3 March 2021 on an EU Disability Rights Strategy for 2021-2030, the European Commission announced that, by the end of 2023, it will propose an EU-wide Disability Card, as an instrument of mutual recognition of the disability status, building on the experience of the ongoing pilot project as well as on that of the European parking card for persons with disabilities.

## Feedback from the EU Disability Card Pilot Project

EBU asked two of its’ members from countries in the pilot project, to offer some feedback and impressions on the experience, which can hopefully inform future work. Our thanks to Charlotte Santens from Ligue Braille in Belgium, and EBU Secretary General Maria Kyriacou from Cyprus for this valuable input.

### European Disability Card (EDC) – The Belgian Experience

Brailleliga / Ligue Braille (EBU member for Belgium) shares the following statement of the Belgian Disability Forum (BDF) about the European Disability Card (EDC) Pilot Project

**Background**

In January 2009, the General Assembly of the BDF took into account the testimonials of people who had encountered problems in being recognised as disabled when travelling to other EU Member States. The BDF found that in many cases people were subject to decisions or refusals that restricted their free movement. The idea was to ensure equal mobility, based on the voluntary presentation of a card. It was not about opening up new rights. The note was presented to the EDF, which defended the idea at European Commission level.

**European pilot project**

The European Commissioner decided to launch a pilot project called the European Disability Card (EDC): any person recognised as having a disability in one of the 8 participating Member States can apply for a card, based on the regulations of their Member State. The card allows them to be recognised as disabled in the other 7 Member States. When a person identifies himself with the card, he has the right to certain services. Each participating Member State determines the utilization of the card. For Belgium, the areas concerned are: tourism, leisure and sport.

**Evaluation**

The European Commission has carried out an evaluation at various levels of the results of the EDC pilot project. The evaluation carried out at Belgian level shows that

- the card holders are satisfied to have a tool allowing them to make their disability known

- they regret that they can not use the EDC throughout the Union

- they regret that too few people (tourist, sports and cultural services) know about the card in Belgium

- they were not asking for price reductions but for guaranteed access to the products and services offered

- they have found the card useful outside the 8 partner countries. For example, many of them used the EDC to obtain facilities when visiting museums in France.

Perspective of an EU-wide Card

The BDF is satisfied with the Commission's announced intention to propose by 2023 an EDC extended to the whole European Union.

However, the fact that the proposal – a proper legislative initiative, this time – would touch upon social rights, (which are a matter of national competence), could at some point block the development of the card.

The BDF is in favour of a pragmatic approach in four stages:

1. Rapidly open up the utilization of the card to all Member States

2 Maintain the principles of mutual recognition and equality between all European citizens

2. Leave it to each Member State to determine the areas of application of the EDC on their territory

3. Negotiate progressively the enlargement of the areas of application, based on the negotiating capacity of the "National Councils" and on the support of international NGOs, such as the EDF and EBU.

### EU Disability Card – Cyprus perspective

EBU Secretary General Maria Kyriacou provides her personal feedback on the pilot project both from within Cyprus, and as a frequent international traveller.

As a hodophile, the introduction, in Cyprus in 2017, of an EU Disability Card aroused my interest as it promised for its holders’ easier travel within Europe! Even though I soon grew aware that the card was only going to be mutually recognized only by the eight EU member states that agreed to be voluntarily involved in this system, I still filled out an application as it ensured equal access to some specific benefits in areas such as culture, tourism, entertainment, sports and transport. Moreover, as there was not a pre-existent national disability card system in place, I wanted to explore the advantages that such a card could have on a national level as well.

Soon after receiving the card, I became aware that the list of benefits varied from one country to another and at least for Cyprus were not only limited but also quite unattractive. Besides a 50% discount on the bus fare for persons with disabilities and their personal assistant and the free use of beach parasols and sunbeds on a designated area at an organised beach the rest of the benefits listed did not capture my interest. Although someone might consider as attractive the free entrance for persons with disabilities and their assistants to the various archaeological sites still these, along with other listed benefits, have been offered free of charge for a long time to all persons with disabilities irrespective to whether their countries participated to this scheme. In addition, sport’s fans with disabilities soon realised that free entrance for them and their personal assistants concerned only the not so popular international and national championship games whereas football games were excluded from the scheme. For many of the benefits listed, there is also a note telling beneficiaries to contact the Municipal and Village Authorities in advance to check availability. Other criticism concerning the scheme included the fact that the card has an expiration date and that it does not include the type of the holder’s disability

Over the past year, in Cyprus, the EU Disability Card took a new twist. It was oftentimes used as a proof so that people with disabilities can benefit from exemptions and benefits granted to them by the Government on the imposed measures for the COVID-19 pandemic.

As for my experience in using the card when traveling abroad, indeed during my trips to Italy and Romania I benefited from free entrances to monuments. In most cases though, I did not have to present the card to receive the benefits as my disability is visible. Further, it was my understanding that the benefits that were granted to me were also provided to all persons with disabilities coming from countries other than the ones participating to the scheme.

Even though my above reflections might seem quite pessimistic, my intension was not to underestimate the scope of the card which I still believe is of great value and importance to persons with disabilities. The card will be more meaningful if the number of participating countries will be expanded to cover all EU countries and if the list of benefits provided will not have to depend on up to the good will and discretion of each member state but rather adopt a homogeneity among these benefits. And even though traveling at the moment seems like a pipe dream, once it will become to an extent possible then the need for the adoption of the EU disability card might be more relevant than ever before!

By **Maria Kyriacou**, EBU Secretary General

## Setting out the EBU position on the EU Disability Card and what we would like for the future

EBU warmly welcomes the announcement in the new Disability Rights Strategy of an EU-wide European Disability Card as one of the “flagship initiatives”. EBU also welcomes the commitment to present a proposal for the card by the end of 2023. Indeed, the Disability Card can play a very positive role in ensuring the effective free movement in the EU of persons with disabilities.

For the past few years, EBU has been following the experience of the ongoing European Disability Card pilot project in eight Member States and is fully aware of the benefits and limitations of the scheme based on feedback from its national member organisations in those eight Member States.

EBU calls on stakeholders at EU and national level, lawmakers as well as civil society organisations, to press for a scaling-up of the EU Disability Card initiative, so as to make it what citizens with disabilities already expect it to be: an EU-wide scheme of recognition of disability for equal access to related services.

More specifically, besides expanding its geographical scope, for the Card to have real added value, there should be homogeneity across the EU regarding the associated benefits. The benefits should be more attractive and cover a wider range of services related to daily life and tourism, such as transport and access to museums.

We also believe that it makes perfect sense to build, not only on the experience of the ongoing pilot project in eight Member States, but also on the European Disability Parking Card initiative, which is entirely relevant here.

Looking beyond punctual services and advantages for persons with disabilities, the Card’s should be an instrument of mutual recognition of the disability status. Indeed, we believe that the pragmatic way forward is not to try and harmonise the different disability assessment systems within the EU, but rather, following the overall approach in the area of social security, to coordinate between different legislations. In fact, the scope of the mutual recognition of the disability status needs to be extended, and it is important to clarify to what extent this should happen in order to make the Card a meaningful instrument to respond to the needs of citizens with disabilities.

EBU welcomes the Commission’s commitment to involve organisations of persons with disabilities in the Strategy’s implementation and it intends to play its full active part in that process. The Disability Platform will be instrumental in this respect and, as we write these lines, we look forward to the European Council conclusions of June 2021 to get a better view of what the framework for the dialogue is going to be.

By: **Maria Kyriacou**, EBU **Secretary General**

## The European Disability Card - A wider perspective from the European Disability Forum (EDF)

### Introduction

The new [Disability Rights Strategy 2021-2030](https://ec.europa.eu/social/main.jsp?catId=1484&langId=en) was published by the European Commission in March 2021, after several years of intense advocacy by EDF and our members, including EBU. One of the key items that we wanted to see included was the [European Disability Card](https://ec.europa.eu/social/main.jsp?catId=1139) – and we succeeded! The Card will be one of the “Flagship Initiatives”, that means it is one of the most important and visible action, of the new Disability Rights Strategy. And more: the European Commission promises to deliver the Card by the end of 2023.

Quote: “*The Commission will propose creating a European Disability Card by end of 2023 with a view to be recognized in all EU Member States. It will build on the experience of the ongoing EU Disability Card pilot project in eight Member States and upon the European parking card for persons with disabilities”.* ([Union of Equality – Strategy on the Rights of Persons with Disabilities 2021 – 2030](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52021DC0101&qid=1621590635832))

We warmly welcome this initiative because we have been demanding a Card already for more than a decade. Until now, this has been a voluntary initiative under a single pilot project with very little guidance or strategic framework.

### How it all started

In fact, the history of the Disability Card goes back already longer: the Disability Movement started campaigning for a Disability Card in 2010. Back then, we were calling it “European Mobility Card” to underline the aspect of freedom of movement in the EU, but it was later changed by the European Commission to the name “Disability Card”.

Following advocacy of the Disability Movement, the European Commission established a “Project Working Group” of interested Member States in 2013 to exchange ideas and pave the way for a possible future European project. This continuous work, to which we have also contributed as observer member of the group and through our active advocacy over the years, started bearing its fruits.

### The Pilot project 2016-2018

In 2015, the European Commission announced the launch of a pilot project in 8 different Member States (Belgium, Cyprus, Estonia, Finland, Italy, Malta, Romania, Slovenia). It provided funding to launch the Card and set up national databases where service providers could list the advantages they give to Card holders. It was based on the principle of mutual recognition – that means that each participating Member States recognizes the Disability Card from the other Member States even if the Card is issued according to national rules.

The pilot project ran between 2016 and 2018 and was only recently evaluated. Overall, the evaluation was positive, stating that the benefits were outweighing the costs of such a project (So far, the evaluation has not been officially published. The information we received was presented at the Disability High Level Group meeting on 9 April 2021 and on the conference of the Portuguese Presidency launching the Disability Strategy on 19-20 April 2021). This led to the concrete commitment in the Disability Strategy as we have it today.

The pilot project served as a good starting ground, but it has been rather limited in its scope and approach. For now it mainly provides advantages for Card holders that relate to activities in the areas of culture, leisure, sport, and tourism. This could be for example a reduction of the entry price for a local museum, a swimming pool, or a cinema. Or other advantages such as shorter queuing times in amusement parks, free entry for a personal assistant at a music festival, or similar. There is also a low level of awareness, both of potential Card holders but also of staff that check the Cards – often they are not familiar with it. This will have to be improved.

### Visually impaired persons and the Disability Card

In many Member States, visually impaired persons already have a national Disability Card, and in some they even have a special status giving them additional benefits compared to other persons with disabilities (e.g. travelling for free on public transport with an assistant; exempt from paying certain types of postage, etc.). The white cane is also an internationally recognized “symbol” so that for visually impaired person such a European Card may not seem such a big improvement.

But there are still additional benefits attached. Having a Card which is recognized EU-wide will make it easier to travel without having to explain your disability to staff on public transport or at the entrance of museums, holiday parks, or other attractions. And for those that live in Member States with no national Card, it will even facilitate this in your own country. Instead of having to show a copy of a medical certificate or the government approval of your disability benefits, a simple Card will be easier to carry around.

When designing the Card for the pilot projects, attention was paid to including also writing in braille to identify the Card easily. But at the moment this has been done on a voluntary basis so this feature needs to be part of the obligatory requirements we ask for when campaigning for the European Card.

It could also be that the Card will be available in a digital format – Italy has already announced that they will do this. Here we need to ensure full accessibility for visually impaired persons. Likewise, we will also need to make concrete demands on the accessibility of the national websites where you can check the benefits of the Card.

Finally, we should also look at the connection between guide dogs and the benefits of the Card. For example, how can we ensure that all venues that offer a discount with the Disability Card also allow entry to guide dogs? This could concern public facilities, such as swimming pools, but also private ones such as theme parks or cinemas.

What is next?

So before we can hold the Card in our hands, many questions remain open. The Strategy is very vague on the how such a Card could look like, what advantages it will cover, what legal form will be needed to establish it, and who will be eligible for it. Also the connection with the European Parking Card still remains open. All of this will now need to be determined.

Therefore, EDF is planning several meetings and events to develop our position and further refine our vision of the Disability Card as we would like to see it. Bearing in mind that the EU decision-making procedures take time, 2023 is not far off. Our work has just begun!

How to participate

Save the date for our online workshop on the Disability Card: **16 September, 10:00 - 12:00 CET**

By **Marie Denninghaus,** EDF Policy Coordinator

## Interviewing Miriam Lexmann, Member of the European Parliament (EPP Group, Christian Democratic Movement, Slovakia) and in particular of the Employment and Social Affairs Committee, on the EU Disability Card

Our thanks to MEP Lexmann and her team for their participation in this newsletter.

### 1.Your country, Slovakia, is not among the eight countries that participated in the pilot project. Are you nevertheless aware of interest for the card in your country, whether among policy-makers or civil society? If applicable, what are the hopes or expectations expressed by Slovakian citizens with disabilities in relation to the card?

I find personally regretful that despite many calls on the Slovak government to join the pilot project, Slovakia neither used the opportunity to start the project since the very beginning nor the opportunity to join at the later stage which was according to my information still possible. By its inactivity, Slovakia missed a unique chance to try, with the financial help of the EU, the implications of this initiative although I know that some politicians (e.g. my friend, former MEP Jana Žitňanská as I was not in active politics at that point) or NGOs active in advocating for the rights of persons with disabilities made extreme efforts to motivate the Slovak government to launch the pilot project in our country. This happened despite clear signals from Slovak citizens with disabilities who were excited to hear about the European Disability Card. Regarding their current expectations, since I entered the active political life, this topic was not really prominent among my contacts as Slovakia was not a part of the pilot project but I believe that now with new Disability Rights Strategy published, it will come back to the spotlight and I will try to communicate about it and also call on our authorities to take adequate steps in preparation for the timely implementation.

### 2. In its Disability Rights Strategy, the Commission indicates that it will propose by the end of 2023 a Card that is EU-wide, but provides no details. As an MEP actively involved in related topics, what are your thoughts?

First of all, I am happy this initiative is finally coming to the agenda after more than a decade. However; taking into account the first campaigns in 2010, the Pilot project in 2016 - 2018 with the assessment period as of 2019, this initiative is in my opinion taking too long and it could have been brought earlier as it enhances the freedom of movement which is in the end one of the fundamental principles of EU Treaties. Therefore, I do not understand why persons with disabilities should wait that long to enjoy this freedom fully and equally and I find it contrary to our commitments we accepted through the UN Convention on the rights of persons with disabilities.

I also think that the Commission should communicate more openly about its plans on this initiative as I believe that politicians, NGOs or even governments would be interested to actively contribute to the preparations. Clear communication would help to inform citizens about what can they expect and to what extend this initiative will simplify their travelling, cultural or sport life.

### 3. In particular, what in your view, beyond the extended geographical scope, does the future card need to have to bring meaningful progress toward facilitating free movement of people with disabilities?

When we look at the pilot project, we can evaluate that it was a good first phase to find out what could potentially work; however, I think and I hope that the Commission will draw the same conclusions that a lot needs to be reconsidered and improved before launching the Disability Card on an EU level. Firstly, if our aim is to achieve equal access to culture, leisure and travelling we should at least set the minimum standard in services that will fall within the scope of the card. Because if we follow the pattern set within the pilot project and its voluntary nature for service providers to join the project or not, some countries will provide a wide range of services or reductions for cardholders while others will have very limited or no offers. Secondly, we need to make sure that cards will be unified and that they will not categorize people according to national standards or national choice as was the case in the pilot project with two different types of cards with different offers.

### 4. The Pilot project operated under the premise that Member States mutually recognize the disability status of the Card holder. Do you think that this is the right approach?

I think that this approach is the crucial precondition of enabling persons with disabilities to enjoy the full potential of free movement across the Member States. I personally believe that if the disability status is recognized according to the national rules, this fact should not be questioned when crossing borders. This is particularly important with regard to the wide range of disabilities as many of them are not visible and nobody should be forced to provide his sensitive health information when entering cultural or sport premises in other member states.

### 5. The EU legislation for the coordination of social security systems does not provide for mutual recognition of invalidity nor of the degree of invalidity, unless there is an established concordance between national legislations on the conditions for determining these. Do you think that the Disability Card should address this gap?

Unfortunately, this area is very unclear and although some aspects are already covered by the Regulation on the coordination of social security systems, there is still confusion about the portability of all rights connected to the officially recognized disability status. It is however, very important to have legal clarity and certainty about one´s rights when using the freedom of movement and therefore I strongly call on setting clear rules. I think that the Disability Card, if implemented properly and evenly across the Member States, could address this gap. The key aspect here is implementation, monitoring and evaluation. One important remark I would like to make is that although the European disability card does not change anything about national eligibility criteria on the recognition of disability status of their citizens, member states should exchange the best practices and critically review their national systems so they are open, flexible and without unnecessary administrative burdens posed on persons with disabilities when trying to get their status officially recognized.

### 6. The Commission contemplates a connexion with the European Disability Parking Card. Do you think this is a good idea?

Solutions should be simple. Connecting two cards into one provided they cover wider range of areas from the recognition of disability status to access to services could simplify the procedures and travelling for persons with disabilities. One unified format of card can ensure equal access to benefits across borders, and it will also be easier for them as they do not need to worry about two different documents instead of only one. I understand that not everyone might be eligible for the parking card that is connected to reduced mobility, but I believe that with current digital tools we can always make the card in a way of harmonised and recognized certificate that enshrines different possibilities and through simple scanning of a code or other digital tool it will be easy to verify which benefits that particular person can enjoy. I believe that if we have these digital options we should use them for everybody´s good, naturally with all safeguards connected to the protection of privacy and personal data of the users.

ENDS.

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