



The voice of blind and partially sighted people in Europe

European Blind Union response to Commission's call for evidence on the EU Disability Card

EBU Position Paper | December 2022

Object of the call for evidence

The European Commission plans to propose in 2023 legislation to create an [EU-wide Disability Card](#) that will be recognised in all Member States. This will promote the [effective exercise by people with disabilities of their free movement rights](#) by facilitating the [mutual recognition of disability status](#) for card holders within the EU. The initiative will build on the experience of the EU Disability Card pilot project and of the EU Disability Parking Card.

Response

The European Blind Union (EBU) strongly supports the European Commission's initiative of a legislative proposal for EU-wide Disability Card (hereafter "the Card") in 2023 to ensure the free movement of people with disabilities in the EU.

We welcome the announced aim of the Card to facilitate the mutual recognition of disability status for card holders within the EU and to address cases of indirect discrimination on the basis of nationality that may result from non-recognition. Precisely because it is a matter of ensuring equal treatment for persons with disabilities in the exercise of EU free movement rights, we believe that the Card should result from [binding legislation, preferably a regulation](#) to avoid differences in implementation at national level.

We believe that, to bring meaningful progress by comparison with the current pilot-project, the material scope of the future Card should include [all areas of services and support already provided for national citizens with disabilities](#), beyond culture, leisure and sport – such as commercial benefits, education, training or employment. Indeed, if the EU single market is to be a reality for consumers with

disabilities, non-nationals/non-residents should have, across EU-internal borders, the same access as nationals/residents to discounts on assistive devices or affordable communications plans, for example.

We understand that the Card will not affect the mechanisms in place at national level to grant the disability status based on national assessments, nor replace nationality disability cards, and that its scope will not cover social security/social protection benefits under national rules, including as coordinated by EU law in a cross-border context). Nevertheless, we argue that the Card should concern, beyond travellers and consumers, [also workers, trainees or students who move to another EU country](#), where their disability status needs to be recognised in that context for equal treatment. In particular, the Card should [facilitate the transition](#) while undergoing a “re-assessment” process in the host EU country.

We also encourage the Commission to improve the legal framework for the [EU Disability Parking Card](#), namely to harmonise at EU level its format, characteristics and issuing procedure. However, we think that the Card, even if combined in a single legal initiative with the EU Disability Parking Card, [should remain physically separate](#), because not all persons with disabilities who are potential holders of the Card are concerned by the Disability Parking Card, and if they are, they may need it to stay in the car while they would need to carry the disability card around for other needs. Moreover, the Card contains personal information (name, date of birth, degree of disability etc.) which should not be visible for the public in a parking place.

The Card – preferably in the shape of a “credit card” – should be in a [standardised and fully accessible format](#) (i.e., identifiable in Braille) and with [digital capabilities](#). It should be [forgery-proof](#) and there should be a [central EU register](#) kept up-to-date by the issuing countries.

Further, to make the Card a success, we believe that the following is necessary:

- An [EU-level website](#) available in all EU languages that reunites all practical details for every country (where to get the Card, format, database of benefits and places that accept it).
- [Dedicated funding](#) to set up the Card, the website and to guarantee continuing operational needs (printing, staff, administration)
- A wide, accessible [awareness-raising campaign](#) in all EU countries to inform about the Card. The campaign must reach users

(so they can get the Card), service providers (so they can know about it and accept it), and the general public.

- Close [collaboration with persons with disabilities and their representative organisations](#) – at all levels and in all their diversity.

About EBU

The European Blind Union (EBU) – **Interest Representative Register number 42378755934-87** – is a non-governmental, non-profit making European organisation founded in 1984. It is one of the six regional bodies of the World Blind Union, and it promotes the interests of blind and partially sighted people in Europe. It currently operates within a network of 41 national members including organisations from 25 European Union member states, candidate countries and other countries in geographical Europe.

European Blind Union

6 rue Gager Gabillot - 75015 Paris

+33 1 88 61 06 60 | ebu@euroblind.org | www.euroblind.org

Contact: Antoine Fobe, Head of Advocacy and Campaigning
ebucampaigning@euroblind.org | +33 1 88 61 06 64