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,
beside 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.