EU Disability Card – Public consultation

# Introduction

There are approximately 90 million persons with disabilities living in the EU. They still face hurdles that may prevent or deter them from moving freely in order to access certain services, especially because there is no mutual recognition of disability status among Member States. This lack of mutual recognition of the disability status may create barriers in relation to the access to certain services during short-term travels across borders, including for touristic purposes. As an example, they may not be able to access preferential conditions (advantages or benefits such as discounted prices or free access) provided by some service providers in another EU Member State in the same way as persons with recognised disabilities from that Member State.

To overcome these issues, the Commission is considering an initiative facilitating the mutual recognition of disability status across the Member States: European Disability Card. It intends to ensure free movement and equal enjoyment of rights for persons with disabilities in the EU. European Disability Card holders would benefit from the same preferential conditions for access to relevant services in all Member States, irrespective of where their disability status was granted.

The initiative will build on the experience of the [EU Disability Card pilot project](https://ec.europa.eu/social/main.jsp?catId=1139&langId=en) and upon the [EU parking card for persons with disabilities](https://europa.eu/youreurope/citizens/travel/transport-disability/parking-card-disabilities-people/index_en.htm).

The EU Disability Card pilot implies voluntary mutual recognition of disability status between participating Member States and provides access to a number of benefits when accessing services in the areas of culture, leisure, sports and transport. It was put in place as a pilot project in 2016-2018 in eight Member States (Belgium, Cyprus, Estonia, Finland, Italy, Malta, Romania, Slovenia) and remains after the end-date of the project.

The EU-model Parking card for persons with disabilities was created in 1998 by Council recommendation 98/376/EC. The initiative is not binding and provides only for minimal harmonisation on a voluntary basis, mostly concerning the design and mutual recognition of the parking card by the Member States. The card gives access to a number of parking rights and facilities specific to individual countries.

This public consultation asks for your views on the challenges faced by persons with disabilities when travelling and exercising their free movement rights, as well as your opinion on the European Disability Card initiative. We appreciate all replies from citizens, organisations, public authorities, businesses, academics and other stakeholders. You are not required to have any previous knowledge of the European disability policies or the EU Disability Card to participate in this consultation.

We will use the findings of this public consultation to identify gaps to be addressed at the EU level as concerns mobility across borders and free movement rights of persons with disabilities.

Completing the survey should take about 20 minutes.

# Instructions about replying to the questionnaire:

In case of multiple choice questions, please insert an “X” before or after the selected option

Please send the completed questionnaire to the following email address: [**EMPL-DISABILITY-CARD@ec.europa.eu**](mailto:EMPL-DISABILITY-CARD@ec.europa.eu)

**For Easy-to-read version (EN),** [**click here**](https://ec.europa.eu/eusurvey/runner/EUDisabilityCard2023PublicConsultationETR)

# Section A: Privacy settings and data protection

The Commission will publish all contributions to this public consultation. You can choose whether remain anonymous when your contribution is published. For the purpose of transparency, the type of respondent (for example, ‘business, association, ‘consumer association’, ‘EU citizen’) country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.

It is mandatory to reply all the following questions

## **Question A1.** Contribution publication privacy settings

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* **Anonymous:** Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.
* **Public:** Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

## **Question A2.** I agree with the personal data protection provisions

[You can consult here the personal data protection provisions.](https://ec.europa.eu/info/law/better-regulation/specific-privacy-statement_it)

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Yes X
* No

# Section B: About you

It is mandatory to reply all the following questions.

## **Question B1.** Language of my contribution

Your contribution can only be accepted in one of the following languages.

Please insert capital letter “X” at the end of line with your selected language.

* Bulgarian
* Croatian
* Czech
* Danish
* Dutch
* English X
* Estonian
* Finnish
* French
* Gaelic
* German
* Greek
* Hungarian
* Italian
* Latvian
* Lithuanian
* Maltese
* Polish
* Portuguese
* Romanian
* Slovene
* Slovak
* Spanish
* Swedish

## **Question B2.** I am giving my contribution as

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

In case you choose the last option ‘Other’, please type capital letter ‘X’ at the end of line followed by your own text.

* Academic/research institution
* Business Association
* Company/Business organisation
* Consumer organisation
* EU citizen
* Environmental organisation
* Non-EU Citizen
* Non-governmental organization X
* Public Authority
* Trade Union
* Other

## **Question B3.** Personal data

Please type the answer for each listed item after the colon symbol.

* First name: Álvaro Antonio
* Surname: Couceiro Farjas
* E-mail address (this will not be published): alvaro.couceiro@edf-feph.org

## **Question B4.** My age

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Under 18
* 18-30
* 31-49
* 50-65
* Over 65
* I prefer not to say X

## **Question B5.** My gender

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Male
* Female
* Other
* I prefer not to say X

## **Question B6.** In relation to disability, the following expression describes me best:

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option. In case you choose the last option ‘Other’, please type capital letter ‘X’ at the end of line followed by your own text.

* I consider myself a person with disabilities but do not have a recognised (i.e. officially according to the national/ regional legislation) disability or impairment
* I have a recognised (i.e. officially according to the national/ regional legislation) disability or impairment
* I am caring for a person with disabilities (formal/informal care)
* I work with persons with disabilities
* I develop disability policies X
* I do not consider myself a person with disabilities
* I prefer not to say
* Other

## **Question B7.** Country of origin

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option. In case you choose the last option ‘Other’, please type capital letter ‘X’ at the end of line followed by your own text.

* Austria
* Belgium
* Bulgaria
* Croatia
* Republic of Cyprus
* Czech Republic
* Denmark
* Estonia
* Finland
* France
* Germany
* Greece
* Hungary
* Ireland
* Italy
* Latvia
* Lithuania
* Luxembourg
* Malta
* The Netherlands
* Poland
* Portugal
* Romania
* Slovakia
* Slovenia
* Spain
* Sweden
* Other

# Section C: About your organization

It is mandatory to reply all the following questions only if in ‘Question B2. I am giving my contribution’ you selected an organization.

## **Question C1.** Country of residence

Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option. In case you choose the last option ‘Other’, please type capital letter ‘X’ at the end of line followed by your own text.

* Austria
* Belgium X
* Bulgaria
* Croatia
* Republic of Cyprus
* Czech Republic
* Denmark
* Estonia
* Finland
* France
* Germany
* Greece
* Hungary
* Ireland
* Italy
* Latvia
* Lithuania
* Luxembourg
* Malta
* The Netherlands
* Poland
* Portugal
* Romania
* Slovakia
* Slovenia
* Spain
* Sweden
* Other

## **Question C2.** Scope of your organisation

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* International
* European X
* National
* Regional
* Local

## **Question C3.** Organisation name

Please type your text in the table cell following this paragraph.

255 character(s) maximum.

| European Disability Forum- EDF |
| --- |

## **Question C4.** Organisation size

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Micro (1 to 9 employees)
* Small (10 to 49 employees) X
* Medium (50 to 249 employees)
* Large (250 or more employees)

## **Question C5.** Transparency register number

Check if your organisation is on the [transparency register](http://ec.europa.eu/transparencyregister/public/homePage.do?redir=false&locale=en). It's a voluntary database for organisations seeking to influence EU decision-making.

Please type your text in the table cell following this paragraph.

255 character(s) maximum.

| 57868523887-16 |
| --- |

# Section D: Problem definition

Your views on the current difficulties and obstacles for persons with disabilities in exercising their free movement rights and mobility across borders in the EU and in accessing preferential conditions offered to persons with disabilities when accessing certain services (in their country and other EU countries).

It is mandatory to reply all the following questions, except those tagged as ‘Other’, if you do not have any further information to provide.

## **Question D1.** In your view, to what extent do the following issues may represent obstacles for persons with disabilities to exercise their free movement right and to profit from benefits or special conditions when accessing certain services?

### **Question D1.1.** Lack of mutual recognition of disability status and/or national disability cards and certificates

To what extent do you think that this may represent obstacles for persons with disabilities?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Not at all
* Small extent
* Moderate extent
* High extent
* Very high extent X

### **Question D1.2.** Lack of a common EU definition of disability

To what extent do you think that this may represent obstacles for persons with disabilities?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Not at all
* Small extent
* Moderate extent
* High extent
* Very high extent X

### **Question D1.3.** Lack of common EU card showing the disability status

To what extent do you think that this may represent obstacles for persons with disabilities?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Not at all
* Small extent
* Moderate extent
* High extent
* Very high extent X

### **Question D1.4.** Different treatment of non-residents with disabilities compared to residents with disabilities

To what extent do you think that this may represent obstacles for persons with disabilities?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Not at all
* Small extent
* Moderate extent
* High extent
* Very high extent X

### **Question D1.5.** Limited provision of preferential conditions offered by certain services for non-residents

To what extent do you think that this may represent obstacles for persons with disabilities?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Not at all
* Small extent
* Moderate extent
* High extent
* Very high extent X

### **Question D1.6.** Lack of information provided on/for the mutual recognition of the disability status

To what extent do you think that this may represent obstacles for persons with disabilities?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Not at all
* Small extent
* Moderate extent
* High extent
* Very high extent X

### **Question D1.7.** Lack of publicly available information on preferential conditions for persons with disabilities

To what extent do you think that this may represent obstacles for persons with disabilities?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Not at all
* Small extent
* Moderate extent
* High extent
* Very high extent X

### **Question D1.8.** Lack of publicly available information on preferential conditions for persons with disabilities

To what extent do you think that this may represent obstacles for persons with disabilities?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Not at all
* Small extent
* Moderate extent
* High extent
* Very high extent X

### **Question D1.9.** Other

Do you consider that there are other issues that may represent obstacles for persons with disabilities to exercise their free movement right and to profit from benefits or special conditions when accessing certain services?

If so, please type your text in the table cell following this paragraph if you

| Given the support granted at State level by the recognition of disability is a necessity to fulfil the rights held under the UN Convention on the Rights of Persons with Disabilities (UN CRPD) and articles 20 and 21 of the Treaty on the Functioning of the European Union, the lack of recognition of disability amongst Member States hinders directly the right to freedom of movement and residence of persons with disabilities. They can thus not fully enjoy their rights as EU citizens.  Therefore, the launch of the European Disability Card is not just a tool needed to improve mobility of persons with disabilities, but an obligation for the implementation of the UNCRPD – ratified both by the EU itself and by every Member State-, in particular its Article 18 (liberty of movement and nationality).  The lack of recognition also implies that persons with disabilities do not enjoy the possibilities to travel, study, or move abroad for work. As a matter of fact, the existing barrier can be better understood by analysing the extremely low employment and student mobility rate, together with the tourism rates, of persons with disabilities.  As an example, in 2018 only 0.24% of Erasmus students received financial support for special needs, reflecting both the lack of participation of students with disabilities in the tertiary education, and the extremely low student mobility rate. (source: De Benedictis, L., Leoni, S. Inclusive universities: evidence from the Erasmus program. Appl Netw Sci 6, 83 (2021). <https://doi.org/10.1007/s41109-021-00419-x>).  We hope, that the European Disability Card will at least solve this issue partly and allow persons with disabilities to move around more freely in the EU. |
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If so, to what extent do you think that this may represent obstacles for persons with disabilities?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Not at all
* Small extent
* Moderate extent
* High extent
* Very high extent X

## **Question D2.** Have you ever moved (to reside) an EU country other than the country of your origin / residence?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Yes
* No

### **Question D2.1.** If yes, have you asked there for recognition of your disability status according to the national rules?

If you answer was ‘Yes’ in ‘Question D2’, please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Yes
* No
* N.A. X

### **Question D2.1.1.** If yes, how long did it take to get your disability status recognised and obtain the national card / certificate?

If you answer was ‘Yes’ in ‘Question D2.1, please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Less than 1 month
* 1 – 3 months
* 4 – 6 months
* 7 – 9 months
* 9 – 12 months
* More than 12 months
* N.A. X

## **Question D3.** Have you ever travelled to other Member States as tourist or for other purposes for less than 3 months?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Yes
* No

### **Question D3.1.** If yes, how many times have you travelled?

If you answer was ‘Yes’ in ‘Question D3’, please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* 1-2
* 3-5
* 6-10
* More than 10

### **Question D3.2.** What was the average duration of your stays?

If you answer was ‘Yes’ in ‘Question D3’, please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Less than 1 week
* 1-3 weeks
* 1-3 months
* More than 3 months

## **Question D4.** In your view, to what extent are persons with disabilities discouraged to travel abroad because their disability status (or document to prove it) is not fully recognised in other Member States?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Not at all
* Small extent
* Moderate extent
* High extent
* Very high extent X

## **Question D5.** Have you ever been personally or are you aware of a person with disabilities who has had his/her national disability status not recognised in other Member States?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Yes X
* No

If you answer was ‘Yes’ in ‘Question D5’, please specify.

Please, type your text in the table cell following this paragraph.

| From the European Disability Forum, we have gathered different experiences of persons with disabilities that, when moving to other EU Member State to work, study, of for tourism, have not been granted the access to support or preferential conditions, because their disability was not recognised. If it is a person who moves to study or work stay for short periods of time, due to the long process of re-assessing their disability in the host country they cannot access services and support at any point of the stay. Often, they are obliged to pay for assistance or assistive devices out of their own pockets.  Likewise, persons with disabilities who move to other countries to work and have thus the right to receive disability benefits in the host country have complaints about the inability to access needed support and assistance until this re-assessment is developed. This entails a considerable increase of the cost-of-living and this can sometimes take more than a year.  Besides this, most respondents express that they have not even tried to move or travel to other EU countries due to the risk of not being able to access assistance and support when needed. |
| --- |

## **Question D6.** According to your knowledge, in which of the following sectors do persons with disabilities from other Member States (non-residents visiting for less than 3 months) have same access to preferential conditions (discounts, special prices, priority, other) as residents with disabilities of your country or the country where your organisation is based? **(Multiple choices)**

Please choose the appropriate choices from the listed options below. Please choose all the options you consider that are more accurate in your case and type capital letter ‘X’ at the end of line of your selected options.

In case you choose the last option ‘Other’, please type capital letter ‘X’ at the end of line followed by your own text.

* Public transport
* Private transport
* Parking X
* Car rental
* Travel agencies
* Tourism
* Leisure services
* Sports centres
* Amusement parks
* Cultural venues and activities
* Supply of electricity and gas
* Telecommunication
* Postal services
* Business services (e.g. management consultancy)
* Facilities management
* Advertising
* Recruitment services
* Services of commercial agents
* Services provided both to businesses and consumers (e.g. legal advice)
* Real estate services
* Distributive trades
* Organisation of trade fairs
* Other

## **Question D7.** What are the most frequent preferential conditions/ benefits that persons with disabilities get?

### **Question D7.1** Free entrance for the person with disabilities

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* In your country/the country where your organisation is based X
* In other Member States X

### **Question D7.2** Price reduction for the person with disabilities

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* In your country/the country where your organisation is based X
* In other Member States X

### **Question D7.3** Free entrance for the person with disabilities and her/his assistant or accompanying person

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* In your country/the country where your organisation is based X
* In other Member States X

### **Question D7.4** Price reduction for the person with disabilities and her/his assistant or accompanying person

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* In your country/the country where your organisation is based X
* In other Member States X

### **Question D7.5** Priority in access to venues, in queues

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* In your country/the country where your organisation is based X
* In other Member States X

### **Question D7.6** Assistance in terms of personal support or assistive technology (wheelchairs, etc.)

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* In your country/the country where your organisation is based X
* In other Member States X

### **Question D7.7.** Other

Do you consider that there are other more frequent preferential conditions/benefits that persons with disabilities get?

If so, please type your text in the table cell following this paragraph.

| * Tax reductions. * Discounts in electronic communication services (commercial services). * Discount/free transport. * Support for employers hiring persons with disabilities. * Support for employees in labour services (intermediation) and reasonable accommodation. * Support for students with reasonable accommodation. * Support for acquiring assistive devices. * Discount/state support for energy costs. * Discounts for acquiring private vehicles. * Housing discount, and/or priority for social housing. * Health services discounts/higher reimbursement level. * Leisure discounts. |
| --- |

If so, please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* In your country/the country where your organisation is based X
* In other Member States X

## **Question D8.** In your view, to what extent are persons with disabilities discouraged to travel abroad or consider they cannot fully exercise their rights because of barriers or difficulties related to their recognition of disability status?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Not at all
* Small extent
* Moderate extent
* High extent X

## **Question D9.** In your view, to what extent are persons with disabilities disadvantaged in travel abroad because of lack of access to preferential conditions offered to nationals with disabilities when accessing certain services?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Not at all
* Small extent
* Moderate extent
* High extent
* Very high extent X

## **Question D10.** Have you ever been personally or are you aware of a person with disabilities who has been denied access to preferential conditions, offered to nationals with disabilities, when accessing certain services in other Member States?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Yes X
* No

### **Question D10.1** If yes, please specify

If you answer was ‘Yes’ in ‘Question D10’, please specify.

Please, choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

In case you choose the last option ‘Other’, please type capital letter ‘X’ at the end of line followed by your own text.

* Because your disability card / certificate was not recognised X
* Because you had no have the disability card / certificate
* Other

### **Question D10.2** If yes, can you estimate what was your financial loss if any?

If you answer was ‘Yes’ in ‘Question D10’, please specify.

Please, type your text in the table cell following this paragraph.

| * Based on complaints received by different persons with disabilities. Amounts vary per case, depending on the discount/free entry of the service. |
| --- |

### **Question D10.3** If yes, have you decided to use the services despite that?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Yes
* No

If you answer was ‘Yes’ in ‘Question D10.3’, please specify.

Please, type your text in the table cell following this paragraph.

|  |
| --- |

# Section E: Your views on the EU parking card

It is mandatory to reply all the following questions, except those tagged as ‘Other’, if you do not have any further information to provide.

## **Question E1.** Are you aware of the EU parking card for persons with disabilities?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Yes X
* No

## **Question E2.** If you have an EU parking card for persons with disabilities, do you make use of it?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Yes, I use it in my country
* Yes, I use it in other Member States
* Yes, I use it both in my country and in other Member States
* No, I do not use it
* N.A. X

## **Question E3.** To what extent do you think that the EU parking card facilitates the mobility of persons with disabilities?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Not at all
* Small extent
* Moderate extent X
* High extent
* Very high extent

## **Question E4** To what extent do you think that the following issues hinder the implementation of the EU parking card?

### **Question E4.1** Differences across Member States in terms of conditions attached to the card (e.g. validity period, conditions for priority parking, etc.)

To what extent do you think that this issue hinders the implementation of the EU parking card?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Not at all
* Small extent
* Moderate extent
* High extent
* Very high extent X

### **Question E4.2** Differences in the card design across the Member States

To what extent do you think that this issue hinders the implementation of the EU parking card?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Not at all
* Small extent
* Moderate extent
* High extent
* Very high extent X

### **Question E4.3** Limited recognition of the card (issued by national or local authorities) across Member States

To what extent do you think that this issue hinders the implementation of the EU parking card?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Not at all
* Small extent
* Moderate extent
* High extent
* Very high extent X

### **Question E4.4** Limited use of the card across Member State

To what extent do you think that this issue hinders the implementation of the EU parking card?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Not at all
* Small extent
* Moderate extent X
* High extent
* Very high extent

### **Question E4.5** Possible fraudulent use of the card

To what extent do you think that this issue hinders the implementation of the EU parking card?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Not at all
* Small extent
* Moderate extent X
* High extent
* Very high extent

### **Question E4.6** Possible forgery of the card

To what extent do you think that this issue hinders the implementation of the EU parking card?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Not at all
* Small extent
* Moderate extent X
* High extent
* Very high extent

## **Question E5** Do you think that a single EU model parking card should be compulsory in the EU?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Yes X
* No

# Section F: The need for EU action

It is mandatory to reply all the following questions, except those tagged as ‘Other’, if you do not have any further information to provide.

## **Question F1** To what extent do you agree that the EU action is needed to achieve the following objectives?

### **Question F1.1** Facilitate mutual recognition of disability among Member States

To what extent do you agree that the EU action is needed to achieve this?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Not at all
* Small extent
* Moderate extent
* High extent
* Very high extent X

### **Question F1.2** Facilitate access to those services offering preferential conditions for persons with disabilities in all Member States

To what extent do you agree that the EU action is needed to achieve this?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Not at all
* Small extent
* Moderate extent
* High extent
* Very high extent X

### **Question F1.3** Improve the implementation of the EU Parking card for persons with disabilities

To what extent do you agree that the EU action is needed to achieve this?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Not at all
* Small extent
* Moderate extent
* High extent
* Very high extent X

## **Question F2** In your view, what are the services persons with disabilities would benefit the most from equal treatment and thus should be covered by the card? **(Multiple choices)**

Please choose the appropriate choices from the listed options below. Please choose all the options you consider that are more accurate in your case and type capital letter ‘X’ at the end of line of your selected options.

In case you choose the last option ‘Other’, please type capital letter ‘X’ at the end of line followed by your own text.

* Public transport X
* Private transport X
* Parking X
* Car rental X
* Travel agencies X
* Tourism X
* Leisure services X
* Sports centres X
* Amusement parks X
* Cultural venues and activities X
* Supply of electricity and gas X
* Telecommunication X
* Postal services X
* Business services (e.g. management consultancy) X
* Facilities management X
* Advertising X
* Recruitment services X
* Services of commercial agents X
* Services provided both to businesses and consumers (e.g. legal advice) X
* Real estate services X
* Distributive trades X
* Organisation of trade fairs X
* Other X All the services, discounts, benefits and support already granted to nationals with disabilities should be granted to persons with disabilities from other Member State. When the person with disabilities moves to study or to because of a work contract, they should have access to the same support as nationals with disabilities in order to work or to study on equal footing with others.

# Section G: Possible policy options

It is mandatory to reply all the following questions, except those tagged as ‘Other’, if you do not have any further information to provide.

## **Question G1.** To what extent do you expect that the European Disability Card would increase your own travelling to other EU Member States?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Not at all
* Small extent
* Moderate extent
* High extent
* Very high extent

## **Question G2.** To what extent would you agree with the following statements concerning the mechanisms to obtain the European Disability Card?

### **Question G2.1** Holders of a national disability card/certificate should automatically obtain the European Disability Card

To what extent do you agree with this statement?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Not at all X
* Small extent
* Moderate extent
* High extent
* Very high extent

### **Question G2.2** Holders of a national disability card/certificate should obtain the European Disability Card upon request without any additional examinations

To what extent do you agree with this statement?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Not at all
* Small extent
* Moderate extent
* High extent
* Very high extent X

### **Question G2.3** Holders of a EU parking card for persons with disabilities should automatically obtain the European Disability Card

To what extent do you agree with this statement?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Not at all X
* Small extent
* Moderate extent
* High extent
* Very high extent

### **Question G2.4** Other

Would you like to add any other statement concerning the mechanism to obtain the European Disability Card?

If so, please type your text in the table cell following this paragraph.

| The use of the European Disability Card must be voluntary, each person with a disability can decide themselves if they want to apply for the card. Therefore, the proposal to acquire the Card must not be automatically sent to potential users, but rather be easily acquired through a clear, accessible and simple process.  The European Disability Card initiative must include an EU-level website that provides practical details for every country, such as where to get the card and how it works. The EU website should be available in every language and must be accessible, with easy-to-read formats and sign language availability, as should the national websites and the full process of acquiring the card.  We would also like to underline that the EU Parking Card and the Disability Card have to remain two separate cards and they should not be directly linked to each other. Not every person who has a disability will be using the Parking Card. While they can be covered under the same legislative proposal, the two card systems have to remain separate to avoid confusion. |
| --- |

If so, to what extent do you agree?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Not at all
* Small extent
* Moderate extent
* High extent
* Very high extent X

## **Question G3.** Do you think that the European Disability Card should be free of charge?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Yes X
* No

## **Question G4.** What format do you think the European Disability Card should have? **(Multiple choices)**

Please choose the appropriate choices from the listed options below. Please choose all the options you consider that are more accurate in your case and type capital letter ‘X’ at the end of line of your selected options.

In case you choose the last option ‘Other’, please type capital letter ‘X’ at the end of line followed by your own text.

* Physical format
* Electronic format (card with microchip)
* Electronic format (mobile device app)
* All of the above X
* Other

## **Question G5.** Do you think that a possible common format of a European Disability Card should include the following features?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

In case you choose the last option ‘Other’, please type capital letter ‘X’ at the end of line followed by your own text.

* Date of validity
* Photo
* Strong security features to prevent fraudulent use / forgery X
* It should be valid in combination with personal ID/passport
* Other

## **Question G6.** Do you think that a common format of a European Disability Card would facilitate mutual recognition of disability status and travel among the Member States?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Yes X
* No

## **Question G7.** Do you think that the European Disability Card should be introduced in all the Member States on a mandatory basis?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

In case you choose the last option ‘Other’, please type capital letter ‘X’ at the end of line followed by your own text.

* Yes, the European Disability Card should be binding for the Member States without the possibility of opting out X
* Yes, the European Disability Card should be binding for the Member States, but with the possibility of opting out
* No, Member States should be allowed to participate in the European Disability Card on a voluntary basis
* Other

## **Question G8.** To what extent do you agree or disagree that the EU parking card should be incorporated in the new European Disability Card?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Strongly agree
* Agree
* Disagree
* Strongly disagree X

# Section H: Your views on the impacts of the European Disability Card

It is mandatory to reply all the following questions, except those tagged as ‘Other’, if you do not have any further information to provide.

## **Question H1.** To what extent do you think the European Disability Card could have the following impacts?

### **Question H1.1** Increasing the number of persons with disabilities travelling in the EU

To what extent do you think the European Disability Card could impact in such a way?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Not at all
* Small extent
* Moderate extent
* High extent
* Very high extent X

### **Question H.2** Increasing the number of persons with disabilities moving to another Member State

To what extent do you think the European Disability Card could impact in such a way?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Not at all
* Small extent
* Moderate extent
* High extent
* Very high extent X

### **Question H1.3** Increasing how often persons with disabilities travel in the EU

To what extent do you think the European Disability Card could impact in such a way?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Not at all
* Small extent
* Moderate extent
* High extent
* Very high extent X

### **Question H1.4** Increasing the length of stays of persons with disabilities when travelling in the EU

To what extent do you think the European Disability Card could impact in such a way?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Not at all
* Small extent
* Moderate extent
* High extent
* Very high extent X

### **Question H1.5** Increasing the opportunity for persons with disabilities to exercise fully their right of travelling across the EU

To what extent do you think the European Disability Card could impact in such a way?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Not at all
* Small extent
* Moderate extent
* High extent
* Very high extent X

### **Question H1.6** Increase access to services offering preferential conditions for persons with disabilities when travelling in the EU

To what extent do you think the European Disability Card could impact in such a way?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Not at all
* Small extent
* Moderate extent
* High extent
* Very high extent X

### **Question H1.7** Increasing the take up of cultural, leisure, sports, and travel services of persons with disabilities when travelling across the EU

To what extent do you think the European Disability Card could impact in such a way?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Not at all
* Small extent
* Moderate extent
* High extent
* Very high extent X

### **Question H1.8** Increasing the digital skills of persons with disabilities (e.g. reduction of the digital gap, greater use of digital services, etc.)

To what extent do you think the European Disability Card could impact in such a way?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Not at all
* Small extent
* Moderate extent X
* High extent
* Very high extent

### **Question H1.9** Simplifying mutual recognition of preferential conditions for persons with disabilities

To what extent do you think the European Disability Card could impact in such a way?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Not at all
* Small extent
* Moderate extent
* High extent
* Very high extent X

### **Question H1.10** Reducing the offer of preferential conditions for accessing certain services

To what extent do you think the European Disability Card could impact in such a way?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Not at all X
* Small extent
* Moderate extent
* High extent
* Very high extent

### **Question H1.11** Other

Do you think that the European Disability Card could impact in another way?

If so, please type your text in the table cell following this paragraph

| The main impact, which justifies the Card, is the possibility to exercise fully their right of travelling across the EU in the same level as persons without disabilities, as expressed by the UNCRPD and the TFUE.  Another positive side-effect of the Disability Card will be for example for persons with invisible disabilities, who can prove their disability status without haven to explain themselves. This is especially true in Member States that currently do not have a national Disability Card.  Finally, we also expect that a European Disability Card will have an impact on the common European identity with the card being a visual representation of the rights that the EU gives to persons with disabilities in their daily lives. The card will be a tangible reminder in everyone’s pocket that the EU brings benefits to EU citizens with disabilities. |
| --- |

If so, to what extent do you think that this may have an impact?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Not at all
* Small extent
* Moderate extent
* High extent
* Very high extent X

## **Question H2.** In which area or direction do you think that the European Disability Card could affect the following costs?

### **Question H2.1** Regulatory charges (e.g. fees, levies and taxes, etc.)

In which area or direction do you think the European Disability Card could affect these costs?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Substantially decrease
* Slightly decrease
* No impact X
* Slightly increase
* Substantially increase

### **Question H2.2** Adjustment costs (e.g. cost of implementing the card, cost of equipment)

In which area or direction do you think the European Disability Card could affect these costs?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Substantially decrease
* Slightly decrease
* No impact
* Slightly increase X
* Substantially increase

### **Question H2.3** Administrative costs of monitoring (e.g. keep track of card use etc.)

In which area or direction do you think the European Disability Card could affect these costs?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Substantially decrease
* Slightly decrease
* No impact
* Slightly increase X
* Substantially increase

### **Question H2.4** Administrative costs of reporting (e.g. storing information, holding databases etc.)

In which area or direction do you think the European Disability Card could affect these costs?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Substantially decrease
* Slightly decrease
* No impact
* Slightly increase X
* Substantially increase

### **Question H2.5** Enforcement costs (e.g. inspections, handling complaints, forgery control)

In which area or direction do you think the European Disability Card could affect these costs?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Substantially decrease
* Slightly decrease
* No impact X
* Slightly increase
* Substantially increase

### **Question H2.6** Indirect costs (e.g. price increases for the general public for services targeted by the card)

In which area or direction do you think the European Disability Card could affect these costs?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Substantially decrease
* Slightly decrease
* No impact X
* Slightly increase
* Substantially increase

### **Question H2.7** Other

Do you think that the European Disability Card can affect other costs?

If so, please type your text in the table cell following this paragraph

| There may be a slight increase of costs at least in the beginning while the Card system is being set up. But the costs of implementing the Card are not to be considered, both because it means fulfilling a right expressed by the Treaties and the UNCRPD, and because often it can be combined with the systems in place for the national disability cards. Moreover, the simplification of procedures in countries without a disability card (where documentation of disability assessment is the only proof) would mean a reduction of costs covering the cost of implementing the EU Disability Card, if any.  Furthermore, it is to be expected that the increase in travel and tourism will offset the slight increase of costs to launch the Card. Besides this, the Commission should provide a funding instrument to set up the European Disability Card in all EU Member States, including an EU-wide website. Afterwards, continued funding for the printing and issuing of the card, staff, communication and maintenance of the website and related tools. |
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In which area or direction do you think the European Disability Card could affect these costs?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Substantially decrease
* Slightly decrease
* No impact X
* Slightly increase
* Substantially increase

## **Question H3.** To what extent do you think that the costs entailed by the European Disability Card would affect the following stakeholders?

### **Question H3.1** Member States’ public administrations (e.g. costs related to the delivery of the Card)

To what extent do you think that the costs entailed by the European Disability Card would affect these stakeholders?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Not at all
* Small extent X
* Moderate extent
* High extent
* Very high extent

### **Question H3.2** Public authorities offering preferential conditions for persons with disabilities

To what extent do you think that the costs entailed by the European Disability Card would affect these stakeholders?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Not at all X
* Small extent
* Moderate extent
* High extent
* Very high extent

### **Question H3.3** Private Sector businesses – Large companies (e.g. costs related to the provision of preferential conditions to EU tourists with disabilities)

To what extent do you think that the costs entailed by the European Disability Card would affect these stakeholders?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Not at all X
* Small extent
* Moderate extent
* High extent
* Very high extent

### **Question H3.4** Private Sector businesses – SMEs (e.g. costs related to the provision of preferential conditions to EU tourists with disabilities)

To what extent do you think that the costs entailed by the European Disability Card would affect these stakeholders?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Not at all X
* Small extent
* Moderate extent
* High extent
* Very high extent

### **Question H3.5** Cultural venues and institutions

To what extent do you think that the costs entailed by the European Disability Card would affect these stakeholders?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Not at all X
* Small extent
* Moderate extent
* High extent
* Very high extent

### **Question H3.6** Civil society organisations (e.g. costs related to the provision of support in using the Card to Card holders with particular needs)

To what extent do you think that the costs entailed by the European Disability Card would affect these stakeholders?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Not at all X
* Small extent
* Moderate extent
* High extent
* Very high extent

## **Question H4.** To what extent do you think the costs entailed by the European Disability Card would affect your company / organisation (costs related to individual services, etc.)?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Not at all X
* Small extent
* Moderate extent
* High extent
* Very high extent
* N.A.

## **Question H5.** To what extent do you agree (or disagree) that the integration of the European Disability Card and the EU Parking Card would lead to the following impacts?

### **Question H5.1** Reducing costs for producing and delivering the Card

To what extent do you agree that the integration of the European Disability Card and the EU Parking Card would impact in such a way?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Not at all X
* Small extent
* Moderate extent
* High extent
* Very high extent

### **Question H5.2** Simplifying application procedures

To what extent do you agree that the integration of the European Disability Card and the EU Parking Card would impact in such a way?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Not at all X
* Small extent
* Moderate extent
* High extent
* Very high extent

### **Question H5.3** Increasing awareness/visibility of the Card

To what extent do you agree that the integration of the European Disability Card and the EU Parking Card would impact in such a way?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Not at all X
* Small extent
* Moderate extent
* High extent
* Very high extent

### **Question H5.4** Increasing the uptake of the Card

To what extent do you agree that the integration of the European Disability Card and the EU Parking Card would impact in such a way?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Not at all X
* Small extent
* Moderate extent
* High extent
* Very high extent

### **Question H5.5** Reducing risk of fraud and forgery of the Card

To what extent do you agree that the integration of the European Disability Card and the EU Parking Card would impact in such a way?

Please choose the appropriate choice from the listed options below. Please choose only one that is more accurate in your case and type capital letter ‘X’ at the end of line of your selected option.

* Not at all X
* Small extent
* Moderate extent
* High extent
* Very high extent

# Section I: Concluding remarks

It is not mandatory to reply all the following questions if you do not have any further information to provide.

## **Question I1.** If you wish to add further information — within the scope of this consultation — please feel free to do so here.

Please type your text in the table cell following this paragraph.

| * The European Disability Card should be established through a Regulation, applicable in all Member States in a rapid, effective and homogeneous manner. A Regulation is a more appropriate instrument to ensure agility in the application and to avoid differences in implementation at national level. The legislation cannot be a recommendation, as that would not allow for the card to have universal and homogeneous applicability. In the case of a Directive, there would be room for interpretation at national level in the transposition, with potential situations where European Disability Cards have an active status in some Member States but other EU countries do not have proper legislation applying its benefits. A Regulation would have immediate effect in every Member State. * Regarding the coverage, the European Disability Card should grant access to all forms of services, benefits and discounts already granted at national level for users of national disability cards or equivalents, accepted by all services offering preferential conditions or adaptations to persons with disabilities, whether provided by public or private entities. Hence, the legislation should not set a limited list of sectors but apply to all services of the EU single market, as listing would entail many exceptions, maintaining most of the current obstacles and limiting its effectiveness. * The development of the new legislation for the EU Parking Card, launched at the same time as the proposal for a European Disability Card is welcomed. In this regard, we believe binding legislation should as well be the instrument, given the limits the Council Recommendation from 1998 has shown. As well, it must be taken into account that both cards must remain physically separate in all cases. Not all persons with disabilities who are potential holders of the disability cards also drive a vehicle and, for practical reasons, the parking card has to stay in the parked vehicle, while the European Disability Card should be carried by the user. |
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## **Question I2.** Please feel free to attach a concise document, such as a position paper

The maximum file size is 1MB.

Only files of the type pdf, txt, doc, docx, odt, rtf are allowed.

Please note that the uploaded document will be published alongside your response to the questionnaire, which is the essential input to this public consultation.

The document is optional and serves as additional background reading to better understand your position.

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