



# Statement of the European Network on Independent Living on the European Disability Card and the European Parking Card for persons with disabilities

**8<sup>th</sup> of September 2023**

The European Network on Independent Living – ENIL welcomes the European Commission's Proposal for a Directive establishing the European Disability Card and the European Parking Card (2023/0311 (COD)). Both cards will reduce barriers to tourism and travelling for disabled people, improve access to the freedom of movement and reduce discrimination. In addition, the Directive represents a limited mutual recognition of disability status and assessment procedures between countries. The proposed cards have an important symbolic value for increased European integration in the area of disability policy.

**ENIL welcomes** that the European Disability Card, as proposed in the Directive, would allow disabled people to access special conditions or preferential treatments with respect to services, activities and facilities in the areas of culture, sports, leisure and transport when visiting other Member States. For example, theatres, cinemas, sports centres or amusement parks might offer free access or reduced tariffs to disabled people. Priority access, aids, materials in braille might be provided. The European Parking would allow access to parking spaces reserved for disabled people or allow for extended parking. To obtain the cards, a person needs to have disabilities officially recognised in an EU Member State. Issuing the cards is at the discretion of authorities in the Member State that granted the disability status.

**ENIL welcomes** the fact that in the areas described, Member States will be obliged to mutually recognise disability status. This limited recognition of disability status is an important innovation in EU disability policy.

**ENIL welcomes** the fact that compared to the pilot project, accepting the European Disability Card will not be voluntary for public and private providers of services, activities and facilities. If special conditions or preferential treatments are offered to holders of a disability status granted within the same country, the same conditions and treatments have to be offered to holders of a European Disability Card, originating from a different EU Member State. Offering special conditions and preferential treatments to disabled people in general will remain at the discretion of providers and subject to national rules.

**ENIL welcomes** the provision of common rules and conditions governing the issuance of the European Parking Card for disabled people and the common template to be applied by all Member States. These changes should ensure that the European Parking Card will indeed be recognised in cross-border situations. Currently, Member States are issuing different types of European Parking Cards, leading to lack of such cross-border recognition.

**ENIL regrets** that there will be no attempt to ensure access to disability specific benefits and services such as personal assistance, housing support or reasonable accommodations in education or at work. It is unfortunate that there will be no attempt to coordinate disability definitions and disability assessment procedures. Holders of a European Disability Card will thus be excluded from benefits and services needed if they wish to stay in another Member State for a longer period of time. In such cases, the disabled person will have to undergo the national disability assessment procedure of the host country. To access personal assistance, the national eligibility procedure will have to be passed.

**ENIL considers** that the proposed European Disability Card will not substantially improve the freedom of movement of disabled people but understands that there is currently no political majority among the Member States to coordinate disability services and benefits, as it is done in respect of other benefits under directive 883/2004 (on the coordination of social security systems). Therefore, disabled people will continue facing significant challenges in accessing the required support and services when moving from one Member State to another.

ENIL will continue working towards full access to the freedom of movement for disabled people.

Contact information:

Florian Sanden  
ENIL Policy Coordinator, [florian.sanden@enil.eu](mailto:florian.sanden@enil.eu)

ENIL Brussels Office vzw/asbl

Mundo J - 6th Floor, Rue de l'Industrie 10, 1000 Brussels  
Belgium

[secretariat@enil.eu](mailto:secretariat@enil.eu), [www.enil.eu](http://www.enil.eu)

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