

Study supporting the Impact assessment of an EU initiative introducing the European Disability Card



28 September 2023

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**Study supporting the Impact
assessment of an EU initiative
introducing the European Disability
Card**

Final Report

Manuscript completed in September 2023.

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Luxembourg: Publications Office of the European Union, 2023.

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PDF ISBN 978-92-68-08966-8 doi: 10.2767/832569 KE-03-23-429-EN-N

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List of abbreviations

AWS	Accessible Word Document
CEA	Cost-Effectiveness Analysis
CMI	Carte mobilité inclusion (Mobility inclusion card)
CSO	Civil Society Organisation
DG GROW	Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs
DG JUST	Directorate-General Justice and Consumers
EDC	European Disability Card
EDF	European Disability Forum
EP	European Parliament
ETR	Easy to Read version
EU	European Union
EUCFR	Charter of Fundamental Rights of the European Union
EU-SILC	EU Statistics on Income and Living Conditions
EU DAP	EU Disability Action Plan
GALI	Global Activity Limitation Instrument
GO	General Objectives
ICT	Information and Communication Technologies
MCDA	Multi-Criteria Decision Analysis
MS	Member States
NCA	National Competent Authority
NGOs	Non-Governmental Organisations
PwD	Persons with Disabilities
PWG	Project Working Group
REC	Rights, Equality and Citizenship Programme (2014-2020)
SDG	Sustainable Development Goal
SME	Small and Medium-sized Enterprise
SO	Specific Objectives
SWD	Staff Working Document
TFEU	Treaty on the Functioning of the European Union
UN	United Nations
UNCRPD	UN Convention on the Rights of Persons with Disabilities
WHO	World Health Organisation

List of Member States

AT	Austria
BE	Belgium
BG	Bulgaria
CY	Cyprus
CZ	Czech Republic
DE	Germany
DK	Denmark
EE	Estonia
EL	Greece
ES	Spain
FI	Finland
FR	France
HR	Croatia
HU	Hungary
IE	Ireland
IT	Italy
LT	Lithuania
LU	Luxembourg
LV	Latvia
MT	Malta
NL	The Netherlands
PT	Portugal
PL	Poland
RO	Romania
SE	Sweden
SI	Slovenia
SK	Slovakia

1 Introduction

This Final Report is the final deliverable of the request for service EMPL/2020/OP/0016 to provide a “Study supporting the Impact assessment of an EU initiative introducing the European Disability Card”. The study was carried out by Ernst & Young (EY), Valdani, Vicari & Associati (VVA), Open Evidence and FBK-IRVAPP on behalf of the European Commission, Directorate-General for Employment, Social Affairs and Inclusion (DG EMPL).

1.1 Report structure

The report is structured around the following chapters:

- **Chapter 1** presents the report structure, as well as the study objectives and scope and the methodological approach followed;
- **Chapter 2** provides an overview of the EU and international disability frameworks;
- **Chapter 3** presents the findings related to the analysis of the problems affecting persons with disabilities (PwDs) when travelling across the EU for short-term stays, and related causes. This chapter also includes an analysis of the magnitude of the problem, its EU dimension and likely evolution over time;
- **Chapter 4** presents the legal basis and justification of EU action in the field of disability;
- **Chapter 5** includes a definition of the (general and specific) objectives for possible EU action, as well as an analysis of the consistency of these objectives with other relevant EU policies and initiatives;
- **Chapter 6** outlines possible policy options, including the baseline scenario where no further EU action will be taken;
- **Chapter 7** presents a qualitative (and to the extent possible quantitative) assessment of the likely impacts of the identified policy options vis-à-vis the baseline scenario;
- **Chapter 8** includes a comparative analysis and ranking of the proposed policy options;
- **Chapter 9** includes an overview and assessment of the preferred policy option identified as part of this study;
- **Chapter 10** presents the indicators for monitoring and evaluation of the preferred policy options.

Further supporting evidence is provided in the **Annexes** submitted together with this report.

1.2 Objectives and scope of the assignment

1.2.1 Objectives

The primary objective of this study was to elaborate on alternative policy options and legal instruments with a view to examining the possible introduction of a European Disability Card (hereinafter “EDC”).

To this end, the study aimed at:

- Defining and analysing the problem, including its drivers (causes), effects and possible evolution, and analysing the current legal basis and framework. This included:
 - Exploring the range of services in the internal market providing preferential conditions for persons with disabilities;
 - Analysing the implementation of the EU parking card for persons with disabilities, the respective shortcomings and challenges identified and proposing recommendations for improvement.
- Assessing the appropriateness of the possible instruments (Regulation, Directive, Recommendation) to put the initiative into practice, taking into account the subsidiarity principle, as well as their social, economic, environmental (the latter including climate impacts) and to the extent that this is proportionate, digital and fundamental rights impacts

and other impacts as requested by the Better Regulation Guidelines and Toolbox,¹ notably the impact on small and medium-sized enterprises (SMEs) and competitiveness;

- Providing an assessment of the possible impacts of the EDC.

The results of this study will support the Commission with the necessary evidence to analyse the problem and assess the potential impacts of different policy options concerning the scope and content of the initiative on the EDC.

1.2.2 Scope

Subject matter: This study focused on:

- Free movement of persons with disabilities, including how many persons with disabilities (may potentially) cross the EU internal border(s). The analysis also examined how many of these persons may have problems in accessing preferential conditions in another Member State as their disability status is not recognised and, as a consequence, may be potentially deterred from travelling and making use of their rights to free movement.²
- Preferential conditions offered to persons with disabilities moving to other Member States for travelling and/or visiting purposes, mainly including:
 - Monetary support, which includes price reduction or free access to events or specific spaces/systems and is largely provided for accessing public transport systems, cultural events, leisure activities, and sport services, as well as for entering amusement parks;
 - Exemptions, which means that persons with disabilities are freed from an obligation or liability imposed, such as paying for particular services (e.g. certain taxes, electricity or telecommunications services);
 - Other types of miscellaneous support, e.g. access to braille, audio guides, etc., as well as specialised support within the job recruitment sector. Miscellaneous support may also include commitments by specific sectors to serve persons with disabilities before other customers.
- The type of services that are currently providing preferential conditions to persons with disabilities who are (a) nationals of the Member State and (b) moving from their Member State to another Member State for travelling and/or visiting purposes.³
- The nature of concerned services, i.e. whether such services are public or private, as well as of preferential conditions, i.e. if these are offered on a voluntary or mandatory basis.

Timeline: This study covered the period from the launch of the pilot EDC in 2016 up to the latest developments in 2023. When examining the shortcomings and challenges related to the implementation of the EU parking card for persons with disabilities, the study covered the period 2020-2022. Also, the study took a forward-looking timeframe of 15-20 years to account for expected trends and developments and to consider how the expected impacts of the policy options would unfold in the future.

Stakeholders: The main stakeholders relevant to this study included:

- Member States' public administrations;
- EU service provider associations and national service providers;
- Civil Society Organisations (CSOs) advocating for persons with disabilities;
- Persons with disabilities;
- An academic expert on issues related to the (lack of) mutual recognition of disability status of persons with disabilities.

¹ Available at: [link](#).

² Please note that the full access to internal market services across the EU is out of the scope of the assignment, because full access is determined by a wide range of factors and preferential conditions are only part of these factors. Also, external factors, such as insufficient funding for accessibility of services, are also outside the scope of this assignment.

³ Services in scope of the assignment include: (i) areas covered by the European Disability Card pilot action: culture, leisure, sport, public and private transport; (ii) internal market services: i.e. business services (e.g. management consultancy), certification and testing, facilities management, advertising, recruitment services, services of commercial agents, services provided both to businesses and consumers (e.g. legal/fiscal advice), real estate services, distributive trades, organisation of trade fairs, car rental, travel agencies, services in the field of tourism; (iii) services of general economic interest: supply of electricity and gas; telecommunication; postal services.

Territory: This study covered all 27 Member States.

1.3 Methodological approach

1.3.1 Data collection process

This section provides an overview of the desk and field research activities undertaken as part of this study.

Desktop research

Extensive desk research was performed to inform:

- The analysis of the problems affecting persons with disabilities when travel to or visit other Member States, as well as their access to preferential conditions when using services abroad;
- The use of the EU parking card when travelling by car across the Member States.

Moreover, database searches have supported the collection of statistics and data on the number of persons with disabilities by Member State, including those eligible for preferential conditions in accessing services and those holding the EU parking card, as well as persons with disabilities arriving in and leaving each Member State for tourism purposes.

A list of relevant sources of information is included in Annex IX.

Field research

The field research engaged a variety of stakeholders, both at the EU and national levels, through **targeted interviews** and **online surveys**. Ten targeted interviews were conducted with three EU bodies, two EU-level CSOs, two EU parking associations, as well as a disability expert. Five online surveys were targeted respectively at: persons with disabilities; EU service provider associations and their national members; EU-level and national CSOs; and National Competent Authorities (NCAs) and other relevant public authorities in the Member States. In total, 90 responses were received from 22 Member States (AT, BE, CY, CZ, DE, EE, EL, ES, FI, FR, IT, HR, HU, LT, LU, LV, MT, PL, PT, RO, SE and SI).

An additional **questionnaire** was targeted at national service providers in order to gather information on the costs and impacts of offering benefits and/or preferential conditions to persons with disabilities from other Member States. In total, 23 responses were received from service providers operating in 13 Member States (BE 3, CY 1, DE 1, EE 2, ES 1, FI 1, HU 2, LU 1, LT 1, MT2, RO1, SI 5, SK 2) in the following sectors: Public Transport (3), Private Transport (1), Parking (1), Travel Agencies (1), Services in the Field of Tourism (1), Sports Centers (1), Cultural Services (6), Amusement Parks (3), Other services (6). Most of the respondents reported high-level administrative roles in their organisations (e.g. managers, directors, secretary generals, etc.).

Moreover, two **workshops** were conducted with national and EU-level CSOs and members of the EU Disability Platform⁴ respectively. The first one, held on 22 March 2023, involved seven representatives of EU-level CSOs and four representatives of national CSOs. The second one, taking place on 23 March 2023, involved national authorities that are members of the EU disability platform (29 participants from 20 Member States). The aim of the workshops was to share and validate preliminary results from the study and to discuss (i) problems that affect the exercise of free movement rights for persons with disabilities in the EU, (ii) possible EU measures to address the identified problems, and (iii) likely impacts of identified EU measures in terms of both positive and negative effects.

During the study, **case studies** were performed in six selected Member States (i.e. AT, BE, FI, FR, IT and RO) in order to examine different models and experiences of the implementation of the EU parking Card and to identify lessons learnt and recommendations on how to improve its functioning. In total, 22 interviews were conducted (AT 3, BE 5, FI 4, FR 3, IT 5, RO 2) with

⁴ The Disability Platform is an initiative of the Strategy for the Rights of Persons with Disabilities to discuss relevant policy developments, exchange experiences and good practices, and reflect the diversity of disability. Available at: [link](#).

national or local public authorities, civil society organisations and parking associations to inform the case studies.

Lastly, a Call for Evidence – in order to gather preliminary feedback from persons with disabilities, organisations and stakeholders with knowledge of a particular issue on the EDC initiative – and a Public Consultation – to collect information on the EDC initiative – were launched as part of the EDC initiative.

Annex I provide an overview of the consultation activities conducted during this study, including the stakeholders consulted and the key findings.

1.3.2 Challenges encountered and mitigation actions taken

The data collection conducted as part of this study faced some challenges that required adjustments to the original data collection strategy.

Regarding the desk research, **a key challenge was the lack of statistics and monitoring data** on both the number of persons with disabilities in the EU, including those travelling for tourism purposes, and the number and type of preferential conditions offered to persons with disabilities across the Member States. More specifically, not all the Member States shared accessible data on the number of persons with recognised disabilities or those eligible for preferential conditions, even though most produce some form of national statistics on disability. Therefore, in order to obtain reliable figures, data on persons with disabilities by Member State, including those eligible for preferential conditions, were primarily retrieved using administrative or medical records collected at the Member State level, where available. Such information was triangulated with surveys results to obtain an overview of Member States offering preferential conditions to persons with disabilities (both residents and non-residents). However, the **low rate of responses to the online surveys did not permit a systematic triangulation of data**. Inputs and information collected during the online workshops as well as through the online questionnaires on costs helped address this challenge.

Moreover, available data on the number of persons with disabilities holding the EU parking card were not consistent across the Member States. In particular, some Member States collect statistics on the number of issued cards in a given period, while others measure the number of cards in circulation. In some cases, Member States do not have at their disposal data at the national level, but only at the regional or local level. In order to enhance data robustness and comparability, the information collected via desk research conducted at the Member State level was triangulated with information requested directly to the national authorities via the Disability Platform and only consistent data were compared (i.e. number of valid cards in circulation, see Figure 3 in section 3.1.2).

2 Political and legal context

This chapter provides an overview of the relevant EU and international frameworks, including key disability initiatives with a special focus on the exercise by persons with disabilities of their rights to move and reside freely in the EU, as well as to access internal market services, taking into account the EU fundamental principles of non-discrimination and equal treatment.

2.1 Overview of the EU disability framework

2.1.1 EU relevant fundamental principles and related legislation

This section addresses the European disability law relevant to the scope of the study. It is divided into two main parts: the first part provides a comprehensive overview of the EU fundamental principles of non-discrimination, freedom of movement and freedom to provide services (see Box 1 below), while the second part focuses on specific initiatives on disability, paying attention to legislative measures adopted and sectors involved with the purpose of protecting, promoting and facilitating the above mentioned fundamental principles.

Box 1 – Key EU principles relevant to the scope of the study

- The **principle of non-discrimination** - Article 19 of the Treaty on the Functioning of the European Union (TFEU) - specifies that the Council "acting unanimously (...) may take appropriate action to combat discrimination based on sex, racial or ethnic origin, religion or belief, disability, age or sexual orientation".
- **Freedom of movement of persons** - Article 21 of the TFEU - states that "every citizen of the Union shall have the right to move and reside freely within the territory of the Member States, subject to the limitations and conditions laid down in the Treaties and by the measures adopted to give them effect".
- **Freedom to provide and receive services** - Article 56 of the TFEU - entails the freedom to carry out an economic activity on a temporary basis in a Member State in which either the provider or the recipient is not established. Notably, Article 56 TFEU prohibits restrictions on freedom to provide services within the Union against Member State nationals established in a Member State other than that of the person to whom the service is targeted. Article 56 TFEU also applies to service recipients.

Source: Author's own elaboration based on TFEU

With specific regard to the right of freedom of movement, **Directive 2004/38/EC ("Free movement Directive")**⁵ lays down the conditions governing the exercise of the right of free movement and residence within the EU along limits placed on such right.⁶ Pursuant to Recital 31 of the Directive, Member States should implement the Directive without any discrimination based on a person's sex, race, colour, ethnic or social origin, genetic characteristics, language, religion or beliefs, political or other opinion, membership of an ethnic minority, property, birth, disability, age or sexual orientation. The Directive makes a distinction between residence for a short travel/stay (up to three months) (Article 6) and residence for a long stay (longer than three months) (Articles 7 and 16).⁷ Specifically, **Article 6** provides that all EU citizens and their non-EU family members have the right of residence in another Member State for a period of up to three months without any conditions other than holding a valid identity card or passport. Also, **Article 24(1)** provides that all EU citizens and their non-EU family members have the right to

⁵ European Parliament and Council, Directive 2004/38/EC on the right of citizens of the Union and their family members to move and reside freely within the territory of the Member States amending Regulation (EEC) No 1612/68 and repealing Directives 64/221/EEC, 68/360/EEC, 72/194/EEC, 73/148/EEC, 75/34/EEC, 75/35/EEC, 90/364/EEC, 90/365/EEC and 93/96/EEC Directive. Available at: [link](#).

⁶ Member States may restrict the freedom of movement and residence of EU citizens and their family members on grounds of public policy, public security or public health (Chapter VI, Article 27 et seqq. of the Free Movement Directive). On restrictions on other grounds, see Article 15 of the Free Movement Directive.

⁶ Articles 7 and 16 of the Directive concern respectively the right of residence from three months).

⁷ Articles 7 and 16 of the Directive concern respectively the right of residence from three months to five years and the right of permanent residence (referring to a period of time longer than five years).

be treated equally with nationals of the host Member State, within the scope of the Treaty and subject to such specific provisions as are expressly provided for in the Treaty and secondary law. This Article gives specific expression to the principle of non-discrimination on grounds of nationality laid down in Article 18 TFEU, in relation to EU citizens who exercise their right to move and reside within the territory of the Member States,⁸ as well as under Article 21(2) of the Charter of Fundamental Rights. However, **Article 24(2)** of the Directive provides for specific derogations from the principle of equal treatment, allowing the host Member State:

- Not to confer social assistance during the first three months of residence to EU citizens other than workers, self-employed persons, persons who retain such status and members of their families;
- Prior to the acquisition of the right of permanent residence (after five years of continuous legal residence), not to provide maintenance aid for studies (including vocational training) to EU citizens who are economically non-active persons, students or jobseekers and members of their families.⁹

Regarding the freedom to provide services, **Directive 2006/123/EC (“Bolkestein Directive” or “Service Directive”)**¹⁰ aims at removing barriers to the free movement of services between Member States to guarantee services’ recipients and providers the legal certainty necessary for the exercise in practice of the freedom to provide services. The Directive applies to internal market services with the exception, *inter alia*, of transport services (Article 2),¹¹ services of general economic interest (e.g. the postal sector, electricity sector and gas sector) (Article 17) and healthcare services (Recital 22 and Article 2). Pursuant **Article 16** of the Directive, Member States shall respect the right of providers to offer services in a Member State other than that in which they are established. Member States shall not introduce requirements for the access or exercise of a service that are directly or indirectly discriminatory with regard to nationality (non-discrimination clause), unless the requirement is justified for reasons of public policy, public security, public health or the protection of the environment. Moreover, **Article 20** requires the Member States to ensure that the general conditions of access to a service do not contain discriminatory provisions based on the nationality or place of residence of the recipient, but without precluding the possibility of providing for differences in the conditions of access where these are justified by objective criteria.

Moreover, **Regulation (EU) 2018/302 (“Geo-blocking Regulation”)**¹² aims to prevent discrimination based on customers’ nationality, place of residence or place of establishment, including unjustified geo-blocking, in cross-border transactions between a trader and a customer relating to the sales of goods and the provision of services within the Union. To this end, it establishes that traders selling through online interfaces shall sell (but not deliver) goods and services to customers established in a different Member State at the same price and conditions offered to local customers. The Regulation applies to internal market services with the exception of transport services¹³, and non-economic services of general interest are also excluded (Article 1). Pursuant **Article 3**, online traders selling goods and services in a Member State must not refuse a sale based on the consumer’s nationality or location. Also, according to **Article 4**, online traders shall not offer different terms and conditions to customers from other Member States, in particular when the customer seeks to receive services from a trader, other than electronically

⁸ C-709/20, The Department for Communities in Northern Ireland, ECLI:EU:C:2021:602, paragraph 66.

⁹ See recital (21) of Directive 2004/38/EC and Joined Cases C-22/08 and C-23/08, *Vatsouras and Koupatantze*, paras 34 and 35.

¹⁰ European Parliament and the Council, Directive 2006/123/EC on services in the internal market. Available at: [link](#).

¹¹ The transport sector is subject to extensive EU legislation, including passengers’ rights. Notably, under Title VI (Articles 90 to 100) of the TFEU, the transport sector is subject to harmonised rules concerning market integration and passenger rights in air, rail, road and maritime transport.

¹² European Parliament and the Council, Regulation (EU) 2018/302 on addressing unjustified geo-blocking and other forms of discrimination based on customers’ nationality, place of residence or place of establishment within the internal market and amending Regulations (EC) No 2006/2004 and (EU) 2017/2394 and Directive 2009/22/EC. Available at: [link](#).

¹³ As noted above, the transport sector is subject to extensive EU legislation, including passengers’ rights. Notably, under Title VI (Articles 90 to 100) of the TFEU, the transport sector is subject to harmonised rules concerning market integration and passenger rights in air, rail, road and maritime transport.

supplied services, in a physical location within the territory of a Member State where the trader operates.

With specific regard to **passengers' rights legislation and the transport sector**, the EU has established a **comprehensive legislative framework related to transport accessibility, including both legislative acts that confer individual rights of passengers with disabilities and legislative acts that seek to improve access to transport services**. In particular, EU Regulations on the rights of passengers travelling by air,¹⁴ rail,¹⁵ sea and inland waterway,¹⁶ bus and coach¹⁷ contain **specific provisions on passengers with reduced mobility or disability**, including measures linked to access, non-discrimination, assistance and complaint mechanisms. Also, the Regulation (EU) 1315/2013 on Union guidelines for the development of the trans-European transport network aims to develop a EU-wide network of railways, roads, inland waterways, maritime shipping routes, ports, airports, and railroad terminals and remove obstacles and technical barriers in trans-Eu transport routes.¹⁸ In addition, in order to improve access to rail transport services, the Directive 2016/797/EU on the interoperability of the rail system within the European Union¹⁹ defines the structural and functional subsystems forming part of the railway system. For each of these subsystems, the essential requirements are specified in the Technical Specifications on Interoperability (TSI),²⁰ a set of technical rules covering also the aspects of these subsystems that are relevant to accessibility for persons with disabilities and persons with reduced mobility. Similarly, Directive 2009/45/EC on safety rules and standards for passenger ships²¹ establishes practical rules to improve infrastructure for passenger ships and includes a set of safety requirements for persons with reduced mobility. To this end, it should be considered that also Directive 2019/882/EU on the accessibility requirements for products and services (the "European Accessibility Act")²² covers several aspects of accessibility, including certain elements of air, bus, rail and water transport services (such as websites, mobile services, electronic tickets and information). Lastly, **Directive (EU) 2022/362**,²³ which entered into force in March 2022 and amended Directive 1999/62/EC (the "Eurovignette Directive"),²⁴ aims to increase incentives for environmental sustainability (in terms of climate-friendly choices and behaviours) and to eliminate distortions of competition between users. It must be transposed into national law by 25 March 2024. The Directive provides for a common framework relevant to (i) the transition from yearly taxation to a pay-per-kilometre system (i.e. road pricing) and (ii) low-emitting vehicles. Pursuant Recital 16 of the Directive, the possibility to use roads subject to road charging, such as motorways, tunnels or bridges, rather than challenging local roads, can be important for persons with disabilities. To this end, with the purpose of allowing persons with disabilities to use roads subject to road charging without any additional administrative burdens, the Member States should be allowed to exempt vehicles of persons with disabilities from the obligation to pay a toll or user charge. Moreover, according to Article 1, the Member States may provide for reduced tolls or user

¹⁴ Regulation (EC) No 1107/2006 on the rights of disabled persons and persons with reduced mobility when travelling by air. Available at: [link](#).

¹⁵ Regulation (EC) No 1370/2007 on public passenger transport services by rail and by road. Available at: [link](#); Regulation (EC) No 1371/2007 on rail passengers' rights and obligations. Available at: [link](#).

¹⁶ Regulation (EU) No 1177/2010 on the rights of passengers when travelling by sea and inland waterway. Available at: [link](#).

¹⁷ Regulation (EU) No 181/2011 on the rights of passengers in bus and coach transport. Available at: [link](#).

¹⁸ Regulation (EU) 1315/2013 on Union guidelines for the development of the trans-European transport network. Available at: [link](#).

¹⁹ Directive (EU) 2016/797 on the interoperability of the rail system within the European Union. Available at: [link](#).

²⁰ Technical Specifications for Interoperability. Available at: [link](#). See also, specifically, Commission Regulation (EU) No. 1300/2014 on the technical specifications for interoperability relating to accessibility of the Union's rail system for persons with disabilities and persons with reduced mobility. Available at: [link](#).

²¹ Directive (EC) 2009/45 on safety rules and standards for passenger ships. Available at: [link](#).

²² Directive (EU) 2019/882 on the accessibility requirements for products and services. Available at: [link](#).

²³ European Parliament and Council, Directive (EU) 2022/362 amending Directives 1999/62/EC, 1999/37/EC and (EU) 2019/520, as regards the charging of vehicles for the use of certain infrastructures. Available at: [link](#).

²⁴ European Parliament and Council, Directive 1999/62/EC on the charging of heavy goods vehicles for the use of certain infrastructures. Available at: [link](#).

charges as well as exemptions from the obligation to pay tolls or user charges for or any vehicle used or owned by persons with disabilities.²⁵

2.1.2 Key pillars of EU disability policy

The Commission has supported the development of a specific **European disability policy** since 1983. This has involved a succession of action programmes. The **Community Social Action Programme on the Social Integration of Handicapped People 1983-88**²⁶ and **HELIOS I (Second) Community Social Action Programme for Disabled People (1988)**²⁷ were aimed at promoting networking among rehabilitation and education professionals. The **third disability action programme (HELIOS II)** marked an important shift in the Commission's approach, aiming "to promote equal opportunities for and the integration of disabled people".²⁸ The equal opportunities approach was set out in a 1996 Communication.²⁹ The European Disability Forum (EDF), a platform for the representation of persons with disabilities at the EU level, was subsequently established in 1997 with support from the Commission.

Moreover, from 2003 to 2010, the rights of persons with disabilities were addressed in several sectors, such as transport, public procurement, Information and Communication Technology (ICT), and Structural Funds, under the umbrella of the first **EU Disability Action Plan (DAP)**. The EU DAP focused on employment (2004-2005), active inclusion (2006-2007) and accessibility (2008-2009).³⁰ Since the first EU DAP, multiannual disability strategies have been regularly implemented by the EU to support the efforts in the prevention and fight of inequalities and discrimination against persons with disabilities. In 2010, a strengthened **European Disability Strategy** was launched for the period **2010-2020**.³¹ The Strategy was intended to empower persons with disabilities so that they can fully enjoy their rights and benefit from participating in society and in the EU economy, notably through the Single Market. The Strategy aimed to achieve a "barrier-free Europe" by intervening in eight key areas: accessibility, participation, equality, employment, education and training, social protection, health, and external action. Participation is recognised as being crucial in overcoming obstacles to the social inclusion of persons with disabilities.³² Overall, the Strategy had a positive impact.³³ It helped eliminate barriers for persons with disabilities³⁴ and promoted the inclusion of disability issues in EU legislation and policy, such as the European Accessibility Act,³⁵ and the Web Accessibility Directive.³⁶

Within the overall EU disability framework, there are two initiatives particularly pivotal for defining pathways towards an EDC. These initiatives are:

- The EU parking card for persons with disabilities;

²⁵ Article 1(3) of the Directive has replaced, *inter alia*, Article 7(9)(c) of the Directive 1999/62/EC.

²⁶ Community Social Action Programme on the Social Integration of Handicapped People, 1983-88.

²⁷ HELIOS I (Second) Community Social Action Programme for Disabled People (1988) OJ L104/38. Council Decision of 18 April 1988 establishing a second Community action programme for disabled people (Helios)¹. Available at: [link](#).

²⁸ HELIOS II (Third) Community Action Programme to Assist Disabled People (1993) OJ L56/30; Council Decision of 25 February 1993 establishing a third Community action programme to assist disabled people (Helios II 1993 to 1996). Available at: [link](#).

²⁹ Communication of the Commission on Equality of Opportunity for People with Disabilities – COM (96) 406, 30.07.1996. Available at: [link](#).

³⁰ Communication from the Commission to the Council, the European Parliament, the European Economic and Social Committee and the Committee of the Regions - Situation of disabled people in the European Union: the European Action Plan 2008-2009 {SEC (2007)1548} COM/2007/0738 final. Available at: [link](#).

³¹ European Commission (2010), European Disability Strategy 2010-2020: A Renewed Commitment to a Barrier-Free Europe. Available at: [link](#).

³² Accessibility, participation, equality, employment, education and training, social protection, health, external action.

³³ European Commission (2020), Evaluation of the European Disability Strategy 2010–2020, Commission Staff Working Document, SWD(2020)291. Available at: [link](#).

³⁴ Ibid.

³⁵ Directive (EU) 2019/882 on the accessibility requirements for products and services. Available at: [link](#).

³⁶ Directive (EU) 2016/2102 on the accessibility of the websites and mobile applications of public sector bodies. Available at: [link](#). See also, European Commission (2020), Evaluation of the European Disability Strategy 2010–2020, Commission Staff Working Document, SWD(2020)291. Available at: [link](#); European Economic and Social Committee (2019), Shaping the EU agenda for disability rights 2020-2030: a contribution from the European Economic and Social Committee.

- The pilot European Disability Card.

The **EU parking card for persons with disabilities** was introduced in 2008 by Council Recommendation 98/376/EC,³⁷ and subsequently amended in 2008 by Council Recommendation of 3 March 2008 to include new Member States. Based on a standardised EU model, the EU parking card aimed to promote mutual recognition of parking cards of persons with disabilities and facilitate their free movement in the EU. The Recommendation encouraged the Member States to adopt the standardised EU model for parking cards for persons with disabilities, which may be used in parallel with the parking cards issued in the Member States, and to recognise the parking cards issued by other Member States based on the EU model. The adoption and mutual recognition of the EU parking card remain voluntary.

With respect to the second initiative, in 2011, the EDF published its first proposal for an EDC, pointing to a “*free movement paradox*” for which travelling in a border-free EU is disproportionately difficult for persons with disabilities, especially when it comes to short stays, such as for tourism and education purposes. The EDC was included in the 2013 **EU Citizenship Report**³⁸ as part of the key actions to improve EU citizens’ lives. In action 6, the Commission explicitly committed to launching a pilot initiative to develop a mutually recognised EDC that will facilitate equal treatment of persons with disabilities who travel to other Member States in terms of their access to transport, tourism, culture and leisure. Under this framework, a **Project Working Group** (PWG), composed of 17 Member States,³⁹ the EDF and chaired by Directorate-General Justice and Consumers (DG JUST), met between 2013 and 2014 to work on the EDC, defining some of key features of the Card and its working mechanisms, showing their commitment to make it a successful tool.⁴⁰ The work of the PWG was followed in 2015 by the launch of the pilot action,⁴¹ funded under the Rights, Equality and Citizenship Programme 2014-2020 (REC),⁴² in which eight Member States (Belgium, Cyprus, Estonia, Finland, Italy, Malta, Romania, and Slovenia) voluntarily participated and mutually recognised each other’s cards. In 2021, a **Study assessing the implementation of the pilot action on the European Disability Card and associated benefits** analysed the implementation of the EDC in the participating Member States.⁴³ The study confirmed the usefulness and cost-effectiveness of the EDC and pointed to the need to extend it to all Member States.⁴⁴ Specifically, the Card, which is still today in place in the Member States that participated in the pilot project, contributed towards the mutual recognition of disability status in the participating Member States. Moreover, the study confirmed that the use of the Card boosted higher participation of persons with disabilities in the sectors in scope of the pilot action, particularly the culture and leisure sectors. Also, cross-border mobility was facilitated, in some countries, through the use of public incentives to enhance the participation of national transport providers.

The EU Strategy on Disability 2021-2030,⁴⁵ which builds on the results of the Strategy 2010-2020, proposed the creation of an **EDC for all Member States** by the end of 2023, as a flagship initiative of the Strategy itself.

³⁷ Council Recommendation of 4 June 1998 on a parking card for persons with disabilities (98/376/EC).

³⁸ EU citizenship report (2013), Directorate-General for Justice. Available at: [link](#).

³⁹ All Member States were invited and 17 committed to the PWG: BE, BG, CY, EE, EL, ES, FI, FR, DE, HU, IT, MT, PL, PT, RO, SI and SK.

⁴⁰ EDF Analysis Report “Towards a European Mobility Card”, 2012.

⁴¹ Call for proposals to support national projects on a mutual recognized EDC and associated benefits, launched in 2015 (VP/2015/012). The call was launched as part of the annual work programme to implement the “Rights, equality and citizenship programme 2014-2020” which had 9 objectives among which to promote rights of persons with disabilities.

⁴² Regulation (EU) No 1381/2013 of the European Parliament and of the Council of 17 December 2013 establishing a Rights, Equality and Citizenship Programme for the period 2014 to 2020.

⁴³ The Card was issued in 6 out of 8 participating Member States.

⁴⁴ European Commission, Directorate-General for Employment, Social Affairs and Inclusion, Chiattelli, C., Abbasciano, C., Schizzerotto, A., et al., (2021), Study assessing the implementation of the pilot action on the EU Disability Card and associated benefits: final report. Available at: [link](#).

⁴⁵ Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions (2021), Union of Equality: Strategy for the Rights of Persons with Disabilities 2021-2030. Available at: [link](#).

2.2 Relevant international initiatives

In addition to the EU policy framework, the Member States also adhere to international disability policies. This section provides an overview of the main relevant international initiatives in place, i.e. the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD), the Sustainable Development Goals (SDGs) relevant to disability, and the World Health Organisation (WHO) global disability action plan 2014-2021.

United Nations Convention on the Rights of Persons with Disabilities (UNCRPD)

The UNCRPD was adopted in 2006 by the United Nations (UN) General Assembly and entered into force in 2008 with the purpose of promoting, protecting and ensuring the full and equal enjoyment of all human rights and fundamental freedoms by all persons with disabilities, and also promoting respect for their inherent dignity. The Convention requires that parties protect and safeguard all human rights and fundamental freedoms of persons with disabilities, including the liberty of movement (Article 18) and personal mobility (Article 20). Indeed, the UNCRPD acknowledges the right to freedom of movement as a threshold right necessary to benefit from almost all other rights covered in the Convention, including the right to equality and non-discrimination.

The UNCRPD was ratified by the EU in December 2010 and by all Member States by 2018. The Convention is legally binding for its parties, hence the EU shall comply with its obligations, setting up appropriate mechanisms for its implementation.⁴⁶ To this end, the **European Disability Strategy** for the period **2010-2020** was created as the EU policy instrument aimed at ensuring compliance with the UNCRPD requirements.⁴⁷

Sustainable Development Goals (SDGs) and disability

The 2030 Agenda for Sustainable Development includes 17 goals to be achieved by 2030, of which four explicitly refer to persons with disabilities in areas that would be affected by the introduction of the EDC. The 2030 Agenda aims at ending poverty and recognises that this goal must go hand-in-hand with strategies that build economic growth. It addresses a range of social needs including education, health, social protection, and job opportunities, while tackling climate change and environmental protection (see Box 2 below).

Box 2 – SDGs relevant to the initiative

- **Goal 8** emphasises sustained, inclusive and sustainable economic growth, full and productive employment and decent work. To achieve the goal, Target 8.9 encourages policies that promote sustainable tourism and local culture.
- **Goal 10** aims to reduce inequality within and among countries by empowering and promoting the social, economic, and political inclusion of all, including persons with disabilities (Target 10.2) and ensuring equal opportunities of different groups (Target 10.3)
- **Goal 11** is to make cities and human settlements inclusive, safe and sustainable. To realize this goal, Member States are called upon to provide access to safe, affordable, accessible and sustainable transport systems for all, notably by expanding public transport (Target 11.2) and to ensure access to safe, inclusive and accessible public spaces, also for persons with disabilities (Target 11.7)
- **Goal 16** calls for the promotion of peaceful and inclusive societies for sustainable development. Target 6.b specifically highlights the importance of promoting and enforcing non-discriminatory laws and policies for sustainable development.

Source: Author's elaboration based on the Sustainable Development Goals Report⁴⁸ and the EU's KnowSDG Platform⁴⁹

⁴⁶ European Commission (2020), Evaluation of the European Disability Strategy 2010–2020, Commission Staff Working Document, SWD (2020)291. Available at: [link](#).

⁴⁷ Ibid.

⁴⁸ United Nations (2022), The Sustainable Development Goals Report 2022. Available at: [link](#).

⁴⁹ The KnowSDG website is a publicly available online platform from the European Commission, supporting evidence-based implementation of SDGs. It provides a set of tools associating relevant SDGs to different policies. Available at: [link](#).

World Health Organisation (WHO) global disability action plan 2014-2021

The 67th World Health Assembly⁵⁰ adopted a resolution endorsing the World Health Organisation (WHO) global disability action plan 2014-2021, with the aim of sustaining WHO's and governments' efforts to enhance the quality of life of persons with disabilities. The action plan was developed in consultation with the EU Member States, UN organisations and national and international partners. It has three specific objectives, i.e. (i) to remove barriers and improve access to health services and programmes; (ii) to strengthen and extend rehabilitation, habitation, assistive technology, assistance and support services, and community-based rehabilitation; and (iii) to strengthen the collection of relevant and internationally comparable data on disability and support research on disability and related services. This action plan supports the implementation of measures that are designed and developed to meet the rights of persons with disabilities, as enshrined in the UNCRPD (e.g. Article 20 on personal mobility). As disability cuts across all sectors and involves diverse actors, the implementation of the action plan needs the strong commitment of and action from a wide range of partners (international, regional and national), including, *inter alia*, governments and service providers. Specific actions, detailing what can be done to achieve the plan's objectives, have been proposed. In particular, partners have to provide support to ensure opportunities for persons with disabilities and their caregivers to access fully in community and to promote, amongst others, their health and well-being. This is aimed to facilitate access to a range of assistance and services and to engage, support and build the capacity of persons with disabilities and their caregivers in order to enable independent living and full inclusion in the community.⁵¹

⁵⁰ The World Health Assembly is the decision-making body of the WHO. It includes delegations from all WHO Member States and it is held annually in Geneva, Switzerland, focusing each time on a specific agenda. Available at: [link](#). The list of documents adopted during the 67th World Health Assembly is available at: [link](#).

⁵¹ See Action 2.6 and 2.7 of WHO (2015), WHO global disability action plan 2014-2021. Available at: [link](#).

3 Problem definition

3.1 What are the problems?

This section presents the main problems to be addressed by a possible future intervention. Figure 1 visualises all the elements of the study team’s understanding of the problem by means of a problem tree. The figure should be read from the bottom to the top.

Figure 1 – Problem tree

Consequences	<p>Citizens: (i) Persons with disabilities are discouraged to travel or visit other Member States in light of the uncertainty they face as to what are, and whether they will be able to access, preferential conditions available to persons with disabilities for using certain services in the host Member State</p> <p>Public authorities: (i) Public authorities receive many requests for clarification from non-residents with disabilities who wish to travel to or visit their countries but are unsure as to whether their disability certificates are accepted there (ii) Parking police authorities are sometimes are unsure as to whether disability status of non-residents is accepted in their Member State. Hence, they do not know whether to fine or not a car parked on a designated space reserved to holders of the EU parking card for persons with disabilities</p> <p>Businesses: (i) Service providers are not always familiar with the various national disability certificates in circulation; hence they incur in extra costs and burdens due to lengthy document checks</p>
Problems	<p>1. When persons with disabilities travel to or visit other Member States, their disability status is not always recognised there, in particular when accessing preferential conditions including those related to services</p> <p>2. When travelling by car in the EU, persons with disabilities face difficulties in using their EU parking card</p>
Drivers	<p>A. There is limited acceptance across the EU of national disability cards and certificates of non-residents with disabilities issued by other Member States (equity)</p> <p>B. National divergences in the implementation of the national parking cards for persons with disabilities hinder their mutual recognition across the Member States (regulatory failure)</p>

Source: Author’s own elaboration

3.1.1 Problem 1: When persons with disabilities travel to or visit other Member States, their disability status is not always recognised there, in particular when accessing preferential conditions including those related to services

The UNCRPD provides that persons with disabilities shall be treated equally with dignity and equal rights. Specifically, the Convention ascribed that in order for persons with disabilities to fully realise their equal citizenship in the world, they need to be guaranteed equality, dignity, autonomy, independence, accessibility and inclusion.⁵²

Yet, **when persons with disabilities travel to or visit other Member States, their disability status is not always recognised there.** Indirect evidence of such issue relies upon feedback from stakeholders involved through both open (call for evidence⁵³ and public consultation) and targeted (online surveys,⁵⁴ workshops,⁵⁵ interviews⁵⁶) consultations. This issue was highlighted by persons with disabilities responding to the public consultation. Specifically, 46% of persons with disabilities responding to the public consultation stated that their disability

⁵² Arnardottir, O. M. and G. Quinn (2009). The UN Convention on the Rights of Persons with Disabilities: European and Scandinavian perspectives. ISBN 978-90-04-16971-5.

⁵³ Respondents to the Call for Evidence on the European Disability Card initiative: 32 EU Citizens; 18 CSOs; 6 Other.

⁵⁴ Survey targeted at NCAs Q2.2; Survey targeted at EU-level CSOs Q2.1; Survey targeted at national CSOs Q2.2; Survey targeted at Persons with Disabilities Q2.6; Survey targeted at NCAs Q2.5; Survey targeted at EU-level CSOs Q2.4 (see Annex VII).

⁵⁵ Workshop with CSOs held on 22 March 2023, workshop with NCAs held on 23 March 2023 and workshop with service providers held on 11 May 2023.

⁵⁶ Targeted interviews with one academic expert (#2), two EU CSOs (#5, #6), and four EU bodies (#1, #4, #7, #8).

status is not recognised across the Member States.⁵⁷ Also, consulted public authorities and service providers claimed that **persons with disabilities face challenges in using their national disability cards to prove their disability status. Hence, they might not be treated equally to residents with disabilities of the host country in terms of accessing services under preferential conditions.** Indeed, the study found evidence that disability-related benefits are not always offered on an equal basis to both residents with disabilities and persons with disabilities coming from other Member States (see section 0 and Annex V for further details on the provision of preferential conditions to persons with disabilities across the EU).⁵⁸

Respondents to the call for evidence⁵⁹ and the public consultation conducted for the purpose of this study claimed that persons with disabilities struggle to receive preferential conditions for using certain services, get assistance and, more generally, enjoy disability-related rights abroad. This issue was pointed out by 66% of EU citizens, around ¾ of NGOs and more than half of public authorities; 505 respondents were persons with disabilities.⁶⁰ Oftentimes, in order to prove their disability status, persons with disabilities are requested to show medical documentation.⁶¹

Such limitations represent *de facto* obstacles for persons with disabilities in the exercise of their free movement rights.⁶² Indeed, when planning a trip, persons with disabilities highly value preferential conditions offered by the country of destination, including monetary support (e.g. price reduction or free access to events or specific spaces/systems), exemptions (e.g. from paying for particular services such as certain taxes, electricity or telecommunications services) as well as other types of miscellaneous support (e.g. access to braille, audio guides, etc.).⁶³ Preferential conditions are highly valued by persons with disabilities because of the financial constraints they face when travelling. Indeed, because of their specific needs, travel costs for persons with disabilities are higher than for persons without disabilities.⁶⁴ Such additional costs are due, for instance, to expenses they incur in order to access and use services (e.g. taxi, higher category hotels) as well as to pay caregivers' travels.⁶⁵

Available statistics show that persons with disabilities are more financially vulnerable. According to EU SILC data, in 2021 the at-risk-of-poverty or social exclusion rate for persons without disabilities was 18.8% compared to 29.7% for those with disabilities, and 36.2% for persons with severe disabilities.⁶⁶ Moreover, persons reporting "severe" disability are overrepresented in the lowest quintiles of the income distribution at the EU level, while they are underrepresented in the upper quintiles.⁶⁷ Figure 7 displays the shares of persons within each income quintile in 2021 by their level of disability. Around 30% of persons reporting "severe" disability are in the first quintile of the income distribution, compared to only about 18% of persons with no

⁵⁷ See Annex I – section 2.2, results from the public consultation.

⁵⁸ Survey targeted at NCAs Q2.2, 2.8 and Q2.10; Survey targeted at other relevant public authorities Q2.8 and Q2.10 (see Annex VII); Survey on costs targeted at service providers Q11 and Q33 (See Annex VII); Desk research conducted at the Member State level: AT, CY, CZ, DE, PT, SI; Workshop with service providers held on 11 May 2023.

⁵⁹ Respondents to the Call for Evidence on the European Disability Card initiative: 5 EU Citizens; 10 CSOs.

⁶⁰ See Annex I – section 2.2, results from the public consultation.

⁶¹ European Commission (2022), Call for evidence for an impact assessment. Available at: [link](#); European Parliament, Priestly (2022), Disability assessment, mutual recognition and the EU Disability Card. Study commissioned by the European Parliament's Committee on Petitions. European Commission (2022), Call for evidence for an impact assessment. Available at: [link](#); Survey targeted at Persons with Disabilities Q2.4; Survey targeted at NCAs Q2.8; Survey targeted at EU-level CSOs Q2.1; Survey targeted at national CSOs Q2.2; Survey targeted at national CSOs Q2.3 (See Annex VII).

⁶² Survey targeted at NCAs Q2.3; Survey targeted at PAs Q2.3; Survey targeted at EU-level CSOs Q2.2; Survey targeted at national CSOs Q2.3; Survey on costs targeted at service providers Q11 and Q33 (See Annex VII). Survey targeted at NCAs Q2.2 and Q2.8 (See Annex VII); European Parliament, Priestly (2022), Disability assessment, mutual recognition and the EU Disability Card. Study commissioned by the European Parliament's Committee on Petitions. Available at: [link](#).

⁶³ Ibid.

⁶⁴ McKercher and Darcy (2018), Re-conceptualizing barriers to travel by people with disabilities, *Tourism Management Perspectives*, 59-66.

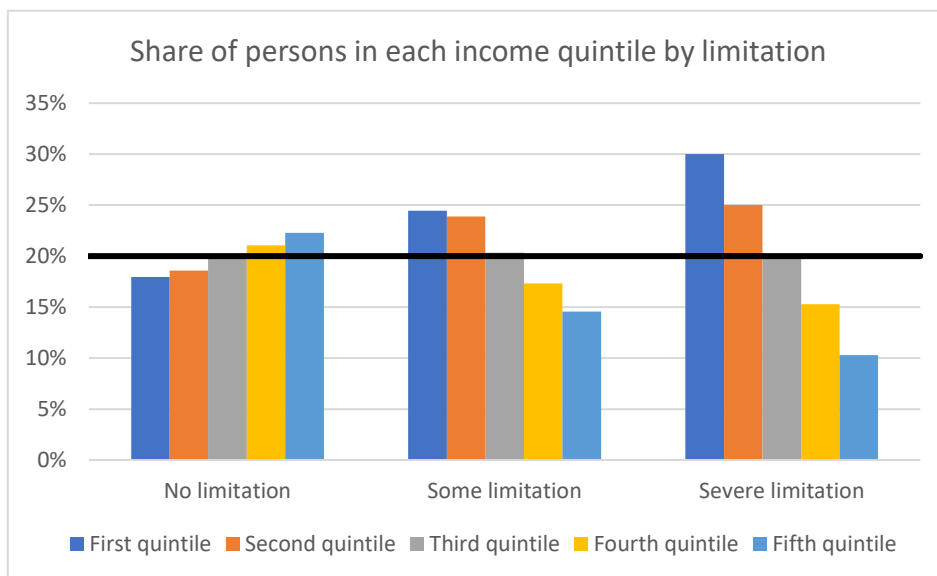
⁶⁵ Eugénia Lima Devile and Andreia Antunes Moura (2021), *Travel by People With Physical Disabilities: Constraints and Influences in the Decision-Making Process*.

⁶⁶ Eurostat database, EU SILC 2021, HLTH_DPE010. Available at: [link](#).

⁶⁷ Ibid.

disability. At the same time, the figure drops to only about 10% of persons with “severe” disability in the highest income quintile, while it increases to 22% for persons with no disability. Persons with “some” disability still appear to be at some disadvantage, but less than the populations with greater disability. The horizontal line in Figure 7 represents the general distribution of income for the total population, where each income quintile covers 20% of the total population.

Figure 2 – Shares of EU population by disability and income quintile, 2021



Source: Authors' own elaboration based on Eurostat data

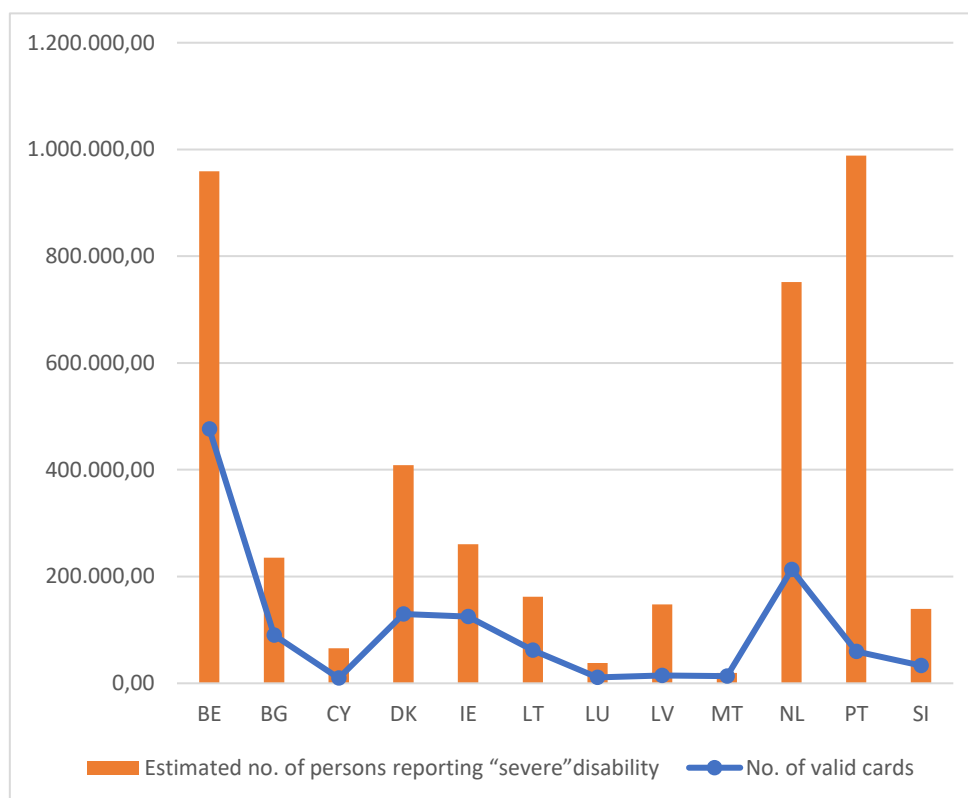
In light of such costs, **limited access to preferential conditions represents a key factor that may influence the decision for persons with disabilities not to travel.**⁶⁸

3.1.2 Problem 2: When travelling by car in the EU, persons with disabilities face difficulties in using their EU parking card

Since the adoption of Council Recommendation 98/376/EC, **the EU parking card for persons with disabilities has been adopted in – and is widely used by – all Member States**, as demonstrated by the large number of existing valid cards (see Figure 3).

⁶⁸ Survey targeted at EU-level CSOs Q2.3: one respondent; Shaw and Coles, 'Disability, holiday making and the tourism industry in the UK: a preliminary survey', 25(3) *Tourism Management* (2004) 397-403; Eugénia Lima Devile and Andreia Antunes Moura (2021), *Travel by People With Physical Disabilities: Constraints and Influences in the Decision-Making Process; Economic Impact and Travel Patterns of Accessible Tourism in Europe - Full Report*, 08/03/2015. Directorate-General for Enterprise and Industry, now known as Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs (DG GROW), European Commission. Available at: [link](#).

Figure 3 – Number of valid EU parking cards per Member State compared to the estimated no. of persons reporting “severe” disability⁶⁹



Source: Authors’ own elaboration based on EUROSTAT data and on data collection conducted at the Member State level

The EU parking card is one of the most important achievements of the EU disability policy and contributed to the free movement of persons with disabilities. Indeed, persons with disabilities consulted during the study largely confirmed to be aware of the card⁷⁰ and to make use of it.⁷¹ Overall, **the adoption of a common EU-model card has contributed towards mutual recognition of national parking cards across the Member States,⁷² thus facilitating the free movement of persons with disabilities** in the EU.⁷³ Consistently, a survey conducted by the EDF in 2020 defined the EU parking card as one of the most practical EU initiatives on disability.⁷⁴

However, the card stems from a Recommendation, which is non-binding by nature, thus leaving a large margin of discretion to the Member States in implementing it. Moreover, the Recommendation was adopted 25 years ago and has never been updated so far, hence the Member States have taken unilateral actions over the years with a view to adjusting the EU-model card to new and emerging needs.

⁶⁹ Figure 3 provides data limited to twelve Member States as data collected through desk research and consultation activities on the no. of persons with disabilities holding the EU parking card is not consistent and hardly comparable across the remaining Member States.

⁷⁰ Survey targeted at Persons with Disabilities Q3.1 (See Annex VII); PC: Respondents to the easy-to-read questionnaire Q13 and standard questionnaire QB1 (See Annex II).

⁷¹ Survey targeted at Persons with Disabilities Q1.6, Q3.2 (See Annex VII); PC: Respondents to the easy-to-read questionnaire Q14 and Q15 and standard questionnaire QB2 (See Annex II).

⁷² Survey targeted at NCAs Q3.2; Survey targeted at other public authorities Q3.2; Survey targeted at EU-level CSOs Q3.1; Survey targeted at national CSOs Q3.2 (See Annex VII).

⁷³ Survey targeted at NCAs Q3.2; Survey targeted at other public authorities Q3.2; Survey targeted at EU-level CSOs Q3.1; Survey targeted at national CSOs (See Annex VII); PC: Respondents to the standard questionnaire QB3 (See Annex II).

⁷⁴ EDF recommendations for strengthening the EU Parking Card 2020. Available at: [link](#).

As pointed out by public authorities, CSOs and persons with disabilities consulted during the study, **national differences in terms of the design and functioning of the EU parking card cause uncertainty for persons with disabilities about how they can use their parking card, in which area they can circulate and park when travelling and how they can be sure to respect all the traffic rules outside their municipality of residence.**⁷⁵ This issue has been pointed out by respondents to the public consultation and specifically by 60% EU citizens, almost two third of CSOs, half of the public authorities; 487 respondents were persons with disabilities.⁷⁶ Also, a public authority consulted during the study reported to receive many requests for clarification on how the EU parking cards issued in other Member States can be used in the country of the concerned authority.⁷⁷ Moreover, from 2018 to 2022, around 260 complaints were submitted on the SOLVIT platform about the lack of transparency of information on rights granted by the card to persons with disabilities when travelling to other Member States, limited mutual recognition of national parking cards, as well as the rightfulness of fines received even when showing the EU parking card (see Box 3 below).

In turn, **such uncertainty creates practical difficulties in the exercise of freedom of movement for persons with disabilities.** Indeed, not having their EU parking card recognised in another Member State, not knowing which conditions are linked to its possession and how the EU parking card is checked by local authorities refrain persons with disabilities from using the card abroad, thus discouraging them to travel by car across the EU (see also section 3.3.2). Moreover, as pointed out by several public authorities, CSOs and persons with disabilities consulted during the study, non-recognition of the EU parking card results in practical disadvantages, such as not being able to park near the entrance of premises.⁷⁸ This issue has been pointed also by respondents to the public consultation and namely by 66% of 1,009 EU citizens, over two third of CSOs, 15 out of 33 public authorities. Of these, 487 respondents were persons with disabilities.⁷⁹

⁷⁵ Survey targeted at Persons with Disabilities Q3.6; Survey targeted at NCAs Q3.6; Survey targeted at other PAs Q3.6; Survey targeted at EU-level CSOs Q3.4; Survey targeted at national CSOs Q3.6 (See Annex VII); Workshop with CSOs held on 22 March 2023, workshop with NCAs held on 23 March 2023; Evidence collected during case study interviews (See Annex I).

⁷⁶ See Annex I – section 2.2, results from the public consultation.

⁷⁷ Evidence collected during case study interviews (See Annex I).

⁷⁸ Survey targeted at NCAs Q3.6; Survey targeted at other public authorities Q3.6; Survey targeted at EU-level CSOs Q3.4; Survey targeted at national CSOs Q3.6 (See Annex VII).

⁷⁹ See Annex I – section 2.2, results from the public consultation.

Box 3 – Examples of complaints received by SOLVIT about the EU parking card for persons with disabilities

- In around 30% of cases, the platform was used to ask what rights are granted to cardholders when visiting another Member State. For example, a French cardholder asked what rights are granted by the EU parking card in the Czech Republic. Similarly, a Hungarian cardholder asked if in Vienna (AT) he could park without paying as he is allowed to do so in his home country, showing the EU parking card.
- In around 25% of enquiries, persons with disabilities, or someone on their behalf, simply asked if the EU parking card is actually recognised across the Member States. In one case, for instance, an Italian cardholder travelling to Vienna (AT) asked if there was a need to communicate to the Austrian authorities the possession of the EU parking card to prevent possible fines.
- In other cases, the SOLVIT platform was used for complaints about different treatment received by cardholders when travelling to another Member State. Around 12% of enquiries concerned fines received by cardholders during their travels, mainly because they assumed that the rights granted by the EU parking card when travelling to other Member States were the same as those granted in their country of origin. For example, in one case, a Danish cardholder complained about a fine received in Portugal for not paying when parking in a space reserved to persons with disabilities, arguing that in Denmark payment is not due when showing the EU parking card. However, assuming that the rights granted by the EU parking card when travelling to other Member States are the same as those granted by the country of origin is a false assumption, as the Council Recommendation only *recommends* Member States to mutually recognise the parking cards “so that cardholders may benefit from the associated parking facilities available in the Member State in which they happen to be”.⁸⁰
- In two other cases, cardholders complained that their French parking card had not been recognised by local parking authorities abroad, as it does not follow the EU model, which resulted in one case in a fine with the car being taken away and in the other case in denial to park in the special parking space for persons with disabilities close to an airport entrance.
- It can be noted that from 2019 to 2020, the number of SOLVIT enquiries concerning the EU parking card decreased from 74 to 28, possibly due to the effects that the Covid-19 pandemic had on travel. Then, in 2021 and 2022, the number of submissions on this topic progressively grew to, respectively, 49 and 71, still not reaching the pre-pandemic number of enquiries.

Source: Author’s own elaboration based on enquiries submitted on the SOLVIT platform

Finally, the increased use of technology for parking control may create issues as foreign car plates might not be recognised by cameras installed in different municipalities. Public authorities and parking associations’ representatives consulted during the study noted that the increasing use of car plate scanners requires that parking cards are registered and associated to car plates in local databases. This raises issues in case of cars from other Member States which may not be registered in the local database and can get undue fines (see also section 3.3.2).⁸¹

3.2 Magnitude and the EU dimension of the problem

This section provides contextual information on the scale of the problem. It starts with an overview of the overall number of persons with disabilities in the EU, with a view to providing an indication of the population potentially affected by the problem. Then, it focuses on limitations in terms of differences in the number and type of preferential conditions made available to non-residents with disabilities travelling across the EU.

3.2.1 Persons with disabilities in the EU

For the purpose of the study, the total number of persons with recognised disability by Member State is compared to Eurostat data on Member States’ population,⁸² with a view to obtaining the share of the population having a recognised disability status. Figure 4 displays these figures, ranking Member States from those where a larger share of the population has a recognised disability. Figure 4 provides data for the 14 Member States where information on the number of

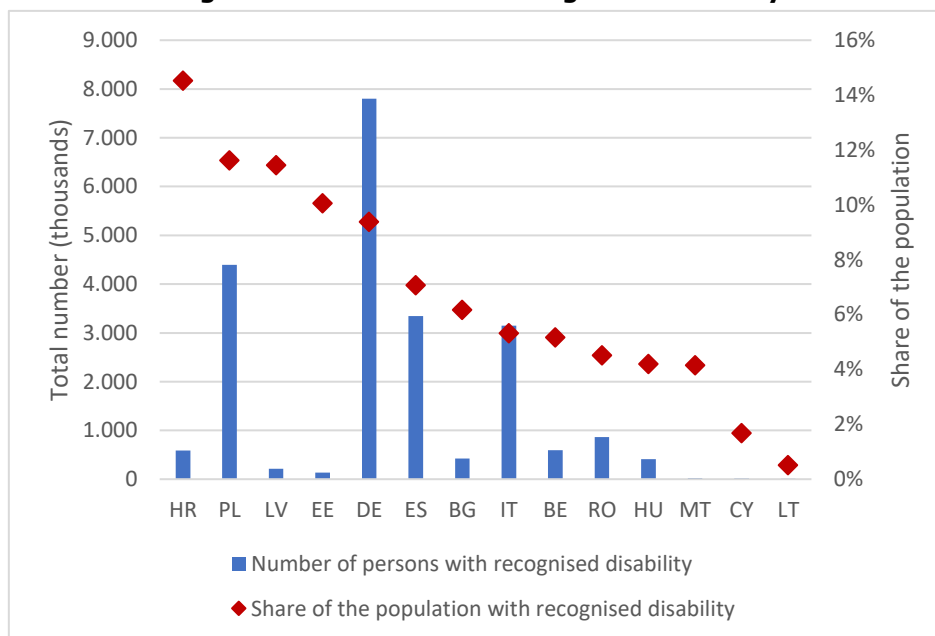
⁸⁰ Article 2 of Council Recommendation of 4 June 1998 on a parking card for people with disabilities (98/376/EC).

⁸¹ Evidence collected during case study interviews (See Annex I).

⁸² Eurostat database, demo_pjan_broad. Available at: [link](#).

persons with recognised disability was accessible.⁸³ Among these, **due to its considerable population, Germany is the country with the highest absolute number of persons with recognised disability (7.8 million). Croatia, on the other hand, is the Member State where the highest share of the population has a recognised disability (around 14%).**

Figure 4 – Persons with recognised disability



Source: Author's own elaboration based on data collection conducted at the Member State level

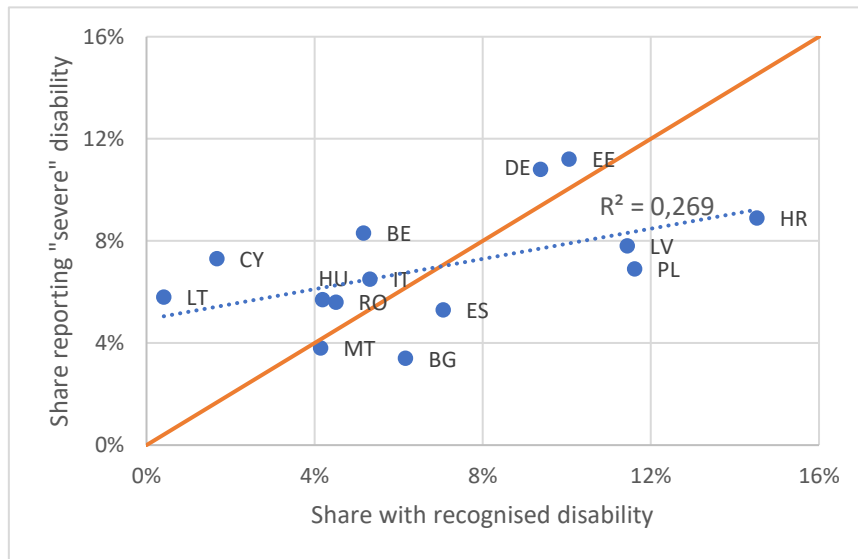
With a view to increasing data comparability across the Member States, available country-based information has been triangulated with EU-level statistics, i.e. survey data in the EU Statistics on Income and Living Conditions (EU-SILC). EU-SILC includes the GALI (Global Activity Limitation Instrument), which is considered a relatively reliable proxy for disability, for the years from 2008 to 2021. This instrument measures disability as a long-standing limitation in activities due to health problems, whose level is self-reported by respondents based on three possible options: "severely limited", "limited but not severely" or "not limited at all". While survey answers may differ across Member States due to cultural and socio-economic factors, the instrument ensures consistency in the way it captures the multi-faceted concept of disability. Importantly, the instrument will be included in all EU surveys in the future, thus making it particularly useful also for the monitoring process in future years.

In the context of this study, the group of the population reporting "some" limitations in daily activities are referred to as persons with "some" disability, and those reporting "severe" limitations as persons with "severe" disability.

Figures 4 and 5 below provide comparisons between information on recognised disability status and EU SILC survey data. Specifically, Figure 5 accounts for the share of respondents with "severe" disability, while Figure 6 does the same with the share reporting "some" disability. The orange line (the 45-degree line) in both Figures indicates a situation of perfect correlation, where the share of persons with recognised disability is the same as that stemming from EU-SILC data. The dashed blue line is the line of best fit among the two variables, with the corresponding R^2 . The data refer to 2021, i.e. the latest year for which recognised disability data are available for most Member States. The majority of Member States do not fall far from the 45-degree line, indicating that there is not a large gap between the two types of data. In Figure 6, on the other hand, the share of persons reporting "some" disability differs by a large amount from the administrative figures reported. This legitimates the use of data on "severe" disability as an informative proxy for recognised disability status.

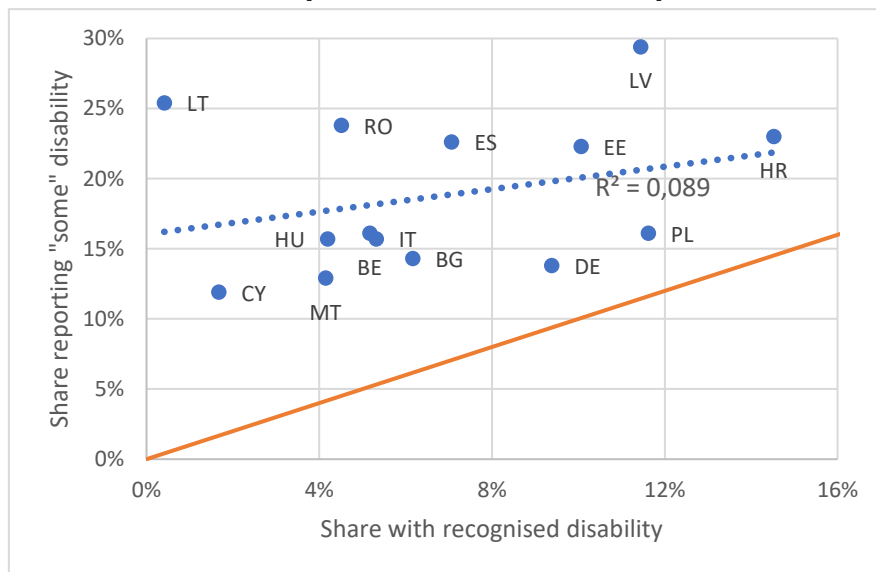
⁸³ These include Belgium, Bulgaria, Croatia, Cyprus, Estonia, Germany, Hungary, Italy, Latvia, Lithuania, Malta, Poland, Romania and Spain.

Figure 5 – Comparison between information on recognised disability status and EU SILC survey data on “severe” disability



Source: Authors’ own elaboration based on desk research

Figure 6 – Comparison between information on recognised disability status and EU SILC survey data on “some” disability



Source: Authors’ own elaboration based on desk research

Table 1 below provides an overview of the mapping exercise based on the triangulation of different available sources, including the population with recognised disabilities in Member States where such information is accessible, the share of the population aged 16 years or older that, according to EU-SILC, reports either “some” or “severe” disability⁸⁴ (EU-SILC only provide data for persons older than 16 and living in private households), and the total estimated number of persons living with “severe” disability. Given that Eurostat statistics only provide population shares, the country totals are computed using information on the total population⁸⁵ and assuming a constant incidence of disability in the age class of persons younger than 16 years old.

The share of persons with a recognised disability eligible for preferential conditions is also computed and reported in Table 1, by using the ratio of the number of persons eligible to the total number of persons with recognised disability. To this end, the number of persons eligible

⁸⁴ Eurostat database, hlth_silc_12. Available at: [link](#).

⁸⁵ Eurostat database, demo_pjan_broad. Available at: [link](#).

for preferential conditions is estimated following desktop research of the main eligibility criteria in different sectors: **12 Member States out of the 14 providing recognised disability data also have clear information on eligibility. In the majority of these countries, the entire population of persons with recognised disabilities can access at least some preferential conditions.**⁸⁶ This implies that recognised disability status is generally enough to access preferential conditions in the country of residence.

The information on self-reported functional limitations yields a good overview of the situation in terms of incidence of disability in the EU: **7.2% of the EU population reported a “severe” level of disability in 2021**, which is equivalent to around 32 million people across the EU. Close to one quarter (23.8%) reported “some” disability, bringing the number up to about 80 million people. Information on severe disability, however, has been shown to be a more informative proxy for recognised disability status in Figures 1 and 2, and can therefore provide a more accurate picture of the EU dimension of the problem. **Across the Member States, there is considerable variation in the share reporting “severe” disability:** Estonia has the largest share, 11.2% (corresponding to around 150,000 persons), while Bulgaria has the smallest share (3.4%, or about 235,000 persons). Germany, France and Italy, the most populous Member States, have the majority of persons with severe limitations (around 9, 6 and 4 million persons respectively).

⁸⁶ In the few cases where the rate of eligibility is not 100% (e.g. Croatia), this is mainly due to age restrictions in the offer of preferential conditions, e.g. to persons older than 18 years old.

Table 1 – Data on self-reported functional limitations and recognised disabilities in 2021

Member State	Number of persons with recognised disabilities	Share of persons reporting "some" limitations in usual activities ⁸⁷	Share of persons reporting "severe" limitations in usual activities ⁸⁸	Estimated number of persons reporting "severe" limitations in usual activities	Share of persons with disabilities eligible for preferential conditions ⁸⁹
Austria	n.a.	23.3% *	8.6% *	768,209	n.a.
Belgium	597,253 ⁹⁰	16.1%	8.3%	959,046	100%
Bulgaria	426,382 ⁹¹	14.3%	3.4%	235,163	99%
Croatia	586,153 ⁹²	23.0%	8.9%	359,236	85% ⁹³
Cyprus	15,000 ⁹⁴	11.9%	7.3%	65,409	100%
Czechia	n.a.	17.5%	7.2%	770,528	n.a.
Denmark	n.a.	28.2%	7.0%	408,803	n.a.
Estonia	133,774 ⁹⁵	22.3%	11.2%	148,968	100%
Finland	n.a.	21.1%	7.2%	398,433	n.a.
France	n.a.	14.5%	8.3%	5,615,505	n.a.
Germany	7,800,000 ⁹⁶	13.8%	10.8%	8,980,743	100%
Greece	n.a.	13.9%	9.4%	1,003,791	n.a.
Hungary	408,021 ⁹⁷	15.7%	5.7%	554,654	n.a.
Ireland	n.a.	13.9%	5.2%	260,329	n.a.
Italy	3,150,000 ⁹⁸	15.7%	6.5%	3,850,354	100%
Latvia	216,536 ⁹⁹	29.4%	7.8%	147,671	100%
Lithuania	11,481 ¹⁰⁰	25.4%	5.8%	162,149	n.a.
Luxembourg	n.a.	19.5%	6.0%	38,084	n.a.
Malta	21,392 ¹⁰¹	12.9%	3.8%	19,612	100%
Netherlands	n.a.	25.6%	4.3%	751,443	n.a.
Poland	4,394,693 ¹⁰²	16.1%	6.9%	2,610,960	100%
Portugal	n.a.	25.3%	9.6%	988,632	n.a.
Romania	865,573 ¹⁰³	23.8%	5.6%	1,075,293	100%
Slovakia	n.a.	n.a.	n.a.	n.a.	n.a.
Slovenia	n.a.	14.8%	6.6%	139,192	n.a.
Spain	3,347,483 ¹⁰⁴	22.6%	5.3%	2,512,131	100%
Sweden	n.a.	15.1%	4.3%	446,310	n.a.
EU 27	n.a.	18.0%	7.2%	32,198,939	n.a.

Source: Authors' elaboration based on EU SILC data and on data collection conducted at the Member State level

* The data for Austria refer to 2020, because of the high distortion in Austrian EU SILC data in 2021.

3.2.2 Preferential conditions made available to persons with disabilities across the EU

Preferential conditions offered to residents with disabilities

In most Member States, **preferential conditions to residents with disabilities** are offered in the following services:¹⁰⁵

- Public and private transport;
- Leisure and sport;
- Parking;
- Amusement parks;
- Tourism;
- Sport, leisure and cultural services.

However, such conditions **are very seldom provided on a mandatory basis** without any consistency in terms of sectors covered and preferential conditions offered across the Member States. This means that only few Member States have a legislative framework in place, which establishes what type of benefits the services, as defined in the internal market *acquis*,¹⁰⁶ shall provide. In the majority of the Member States, mostly public transport and parking services are governed by such frameworks.¹⁰⁷ In connection with parking services, this mandatory provision is often restricted to public parking services and does not cover private ones. Other services where preferential conditions are offered on a mandatory basis more frequently are telecommunications and postal services.¹⁰⁸

For some services (e.g., cultural services, tourism), **preferential conditions are sometimes provided on both a voluntary and a mandatory basis**, depending on the individual Member State and specific service provider. Yet, even when granted on a mandatory basis, preferential conditions may still not be universal, i.e., they are offered only by some providers within the concerned sector (e.g., in France, reduced tickets apply to some public transport services but not all). Further complexity is observed in some federal or regional Member States, such as Austria, Germany and Italy, where regional and local legislation provides for additional preferential conditions besides those granted at the national level based on a mandatory basis.

Nonetheless, **in most service sectors preferential conditions are provided only on a voluntary basis** and as such their provision is decided at the level of the individual service provider. This means that there is no consistent information available on the type of and access to preferential conditions a person with disabilities may receive. Indeed, in case of voluntary-

⁸⁷ Eurostat database, hlth_silc_12. Available at: [link](#).

⁸⁸ Eurostat database, hlth_silc_12. Available at: [link](#).

⁸⁹ The shares are calculated following desktop research of the eligibility criteria to access preferential conditions in different Member States.

⁹⁰ Direction générale Personnes handicapées. *Rapport annuel 2021: changement et dynamisme*. Available at: [link](#).

⁹¹ Latest available data refer to 2011 and were issued by the National Statistical Institute. Available at: [link](#).

⁹² Report on Persons with Disabilities in the Republic of Croatia in 2021 (according to data from the Register of Persons with Disabilities of the Croatian Institute of Public Health). Available at: [link](#).

⁹³ For Croatia, the lower number of persons eligible compared to the population with recognised disabilities is simply due to the presence of age requirements to access some of the preferential conditions (e.g. minors being excluded).

⁹⁴ Department of Persons with Disabilities, 2021 Annual Report. Available at: [link](#).

⁹⁵ National statistics from the Social Insurance Board, 2023.

⁹⁶ Statistisches Bundesamt: 7,8 Millionen schwerbehinderte Menschen leben in Deutschland, 2022. Available at: [link](#).

⁹⁷ Latest available data refer to 2016 and were issued by the Central Statistical Office. Available at: [link](#).

⁹⁸ Latest available data refer to 2019 and were issued by ISTAT in the report "Knowing the world of disability. Persons, relations, institutions". Available at: [link](#).

⁹⁹ Ministry of Welfare, 2021: Table "Key Policy Performance Indicators". Available at: [link](#).

¹⁰⁰ Data obtained following consultation with the Disability and Working Capacity Assessment Office at the Ministry of Social Security and Labour.

¹⁰¹ Commission for the Rights of Persons with Disability (CPRD), 2021 Annual Report. Available at: [link](#).

¹⁰² Electronic National Adjudication Monitoring System about Disability statistics. Available at: [link](#).

¹⁰³ National Authority for the Rights of Persons with Disabilities. Available at: [link](#).

¹⁰⁴ State Database of Persons with Assessment of the Degree of Disability. Available at: [link](#).

¹⁰⁵ Input from country experts (See Annex VI).

¹⁰⁶ Services that are mainly provided for remuneration.

¹⁰⁷ Input from country experts (See Annex VI); Survey targeted at NCAs Q2.8; Survey targeted at other relevant public authorities Q2.8 (see Annex VII).

¹⁰⁸ Input from country experts; Survey targeted at NCAs Q2.8; Survey targeted at other relevant public authorities Q2.8 (see Annex VII).

based conditions, the fact that within a specific sector a service provider decides to offer preferential conditions does not mean that all providers in the sector offer preferential conditions.

Reasons as to why service providers opt for offering preferential conditions to persons with disabilities include (i) ensuring that all their (potential) customers have access to their services; (ii) their customers expressing a preference for greater accessibility of services; (iii) following a marketing strategy to improve the visibility/reputation of their services; (iv) attracting a higher volume of customers; or (v) receiving financial support from public authorities for such service provision.¹⁰⁹

Table 2 below provides an overview of services for which preferential conditions are offered to residents with disabilities, along with information on the nature of such conditions, i.e., whether they are offered on a mandatory or voluntary basis.

¹⁰⁹ Survey targeted at national service providers Q3.4 and questionnaire on costs targeted at service providers Q15 (see Annex VII).

Moreover, there is no consistency in terms of sectors covered and types of benefits offered across the Member States. **The most frequent types of preferential conditions that are offered to persons with disabilities are monetary support (such as price reduction or free entries and memberships) and exemptions.** These are largely provided for accessing public transport services, cultural events, leisure, and sport services, as well as for entering amusement parks. Also, preferential conditions include persons with disabilities being freed from an obligation or liability imposed, such as paying for particular services (e.g., certain taxes, electricity or telecommunications services, membership fees).

Additionally, **there are other types of support services that persons with disabilities may be entitled to.** These vary very much from country to country and can be divided further into whether the service is provided in addition to a service for remuneration (i.e., after a person with disability has paid for the service) or as a standalone non-remuneration service. With regard to the first category, where the provision of the other type of preferential conditions is applied once a person with disability has already paid for the service examples may include:

- A free audio/visual guide, explanatory brochures or leaflets adapted to meet different needs (in Braille lettering or easy to read for example), adapted guided visits (in sign language for example).
- Accessible wheelchair seating and parking places reserved for people with disabilities.
- Free provision of wheelchairs and/or mobility scooters upon request.
- Dedicated hours within retail services where the conditions are adapted to persons with sensitivities (for example, reduction of sounds and lightning).

Regarding the second category, there are also preferential conditions that are provided to persons with disabilities that are not connected to any specific services for remuneration. In many cases these are mostly but not always provided by public services and may include:

- Beach access adapted to the needs of persons with disabilities, such as automated walkways and Seatrac as well as modified deck chairs, sun loungers and beach wheelchairs and scooters.
- Right to being served with priority when visiting/making use of public services, i.e., the possibility to skip queues. In some Member States this also includes face-to-face private services.
- Priority employment appointments within specific parts of the public sector, for example, as telephone operators.
- Use of a service that facilitates an online interaction with a sign language interpreter to communicate with public administrations, social services and hospitals in order to facilitate exchange with persons with hearing impairments.
- Assistance to ensure equal access to continuing professional training and to career or promotion examinations for civil servants or state employees. This may include a sign language interpreter or an attendant accompanying a visually impaired person to locations that are difficult to access.
- Dedicated phone number, where a person with visual impairment or other people who have difficulties using other ways of communication may turn to free of charge in order to be transferred to a specific service or service provider.

In some Member States (e.g., BE, DK, SK), **preferential conditions are offered also to personal assistants**, predominantly to support persons with disabilities to accessing public transport or cultural events. In some instances, this support may be provided on a mandatory basis. For example, in Slovakia public railway service providers are required by law to provide preferential conditions to personal assistants. However, in other countries there is no legislative framework for personal assistants, therefore, it is unclear whether family members and friends who are accompanying a person with disabilities can be considered as personal assistants and, therefore, are eligible for same preferential conditions as professional care providers. In these situations, the decision is up to the service provider.

Table 3 below provides an overview of the types of preferential conditions that are offered across the Member States.

Table 3 – Overview of the types of preferential conditions offered across the Member States to residents with disabilities

Services	AT	BE	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IE	IT	LT	LU	LV	MT	NL	PL	PT	RO	SE	SI	SK
Public transport	Blue	Blue	Blue	Blue	Orange	Orange	Blue	Blue	Blue	Blue	Blue	Blue	Yellow	Blue	Blue	Blue	Blue	Orange	Blue	Blue	Blue	Blue	Orange	Blue	Yellow	Blue	Blue
Private transport	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue
Parking	Yellow	Orange	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue
Business services	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue
Facilities management	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue
Advertising	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue
Recruitment services	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue
Services to commercial agents	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue
Services provided both to business and consumers	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue
Real estate services	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue
Distributive trades	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue
Organisation of trade fairs	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue
Car rental	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue
Travel agencies	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue
Services in the field of tourism	Blue	Orange	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue
Leisure services	Blue	Orange	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue
Sports centres	Blue	Orange	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue
Cultural services	Blue	Orange	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue
Amusement parks	Blue	Orange	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue
Supply of electricity	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue
Telecommunication	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue
Postal Services	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Blue

Legend				
Monetary support	Other type of support	Both	No	n.a.

Source: Authors' own elaboration based on data collection conducted at the Member State level

Preferential conditions offered to non-residents with disabilities

Regarding **preferential conditions offered also to persons with disabilities from other Member States**, available information is very limited and mostly consists of anecdotal evidence. Yet, the data collection undertaken at the Member State level still provides some interesting information. In the majority of the Member States, **most service providers offer preferential conditions to non-residents with disabilities on a voluntary basis**. In Greece and Lithuania, non-residents with disabilities can access for free various archaeological areas and use public transport by showing their national disability card.¹¹⁰ Only in Belgium, all preferential conditions offered to residents are also provided to non-residents with disabilities.

Regarding transport, monthly passes and subscriptions are usually available also to non-nationals with disabilities but who are residents. When it comes to individual tickets, the information provided is not always clear if the preferential conditions apply to also non-residents with disabilities. Therefore, it may occur that a non-resident with disability may be deemed eligible to receive a preferential condition from a specific provider while on another occasion that same provider does not give the preferential condition.

Furthermore, **in the eight Member States that participated in the pilot EDC** (i.e., BE, CY, EE, FI, IT, MT, RO, SI), **preferential conditions are offered to all persons with disabilities from these eight countries**. However, there are differences and exceptions. For instance, in Estonia, all persons with disabilities can access preferential conditions when using culture, leisure, sport, and transport services, regardless of their country of origin. On the contrary, in Malta, the Malta Public Transport only offers preferential conditions to holders of the EU Disability Card marked with 'MT'.¹¹¹

In some Member States (i.e., BE, CY, HR, LU, MT, PL, PT, SE, SK), preferential conditions are offered also to **assistants of persons with disabilities** from other Member States.

The tables below provide an overview of the preferential conditions offered to non-residents with disabilities as well as the type of preferential conditions offered.

¹¹⁰ Data collection conducted at the Member State level (See Annex VI).

¹¹¹ Data collection conducted at the Member State level (See Annex VI).

Table 4 – Services for which preferential conditions are offered across the Member States to non-residents with disabilities

Services	AT	BE	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IE	IT	LT	LU	LV	MT	NL	PL	PT	RO	SE	SI	SK
Public transport	No	Yes	Yes	Yes	Yes	No	No	Yes	n.a.	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	No	No	No	No	Yes	n.a.	Yes	n.a.
Private transport	No	No	Yes	No	No	No	No	No	No	Yes	Yes	Yes	Yes	Yes	No	Yes	No	No	No	Yes	No	No	Yes	No	n.a.	Yes	n.a.
Parking	Yes	Yes	Yes	Yes	Yes	n.a.	Yes	n.a.	No	n.a.	n.a.	Yes	Yes	n.a.	Yes	Yes	Yes	Yes	Yes	n.a.	Yes	n.a.	Yes	Yes	n.a.	n.a.	Yes
Business services	No	Yes	n.a.	n.a.	No	No	No	No	No	No	No	No	No	No	n.a.	No	No	No	n.a.	No	No	No	No	No	n.a.	Yes	No
Facilities management	No	No	n.a.	No	No	No	No	No	No	No	No	Yes	No	No	n.a.	No	No	No	No	No	No	No	No	No	n.a.	Yes	No
Advertising	No	No	n.a.	No	No	No	No	No	No	No	No	No	No	No	n.a.	No	No	No	No	No	No	No	No	No	n.a.	Yes	No
Recruitment services	No	n.a.	n.a.	No	No	No	No	No	n.a.	Yes	No	Yes	Yes	n.a.	n.a.	n.a.	No	Yes	No	No	No	No	No	No	n.a.	Yes	No
Services to commercial agents	No	No	n.a.	No	No	No	No	No	No	No	No	No	No	No	n.a.	n.a.	No	No	No	No	No	No	No	No	n.a.	Yes	No
Services provided both to business and consumers	No	n.a.	n.a.	n.a.	n.a.	No	No	No	No	No	No	No	No	No	n.a.	Yes	No	n.a.	No	No	No	No	No	No	n.a.	Yes	n.a.
Real estate services	No	n.a.	n.a.	No	No	No	No	No	No	No	No	No	No	No	n.a.	n.a.	No	Yes	No	No	No	No	No	No	n.a.	Yes	No
Distributive trades	No	No	No	No	No	No	No	No	No	No	No	No	No	No	n.a.	n.a.	No	No	No	No	No	No	No	n.a.	Yes	Yes	n.a.
Organisation of trade fairs	No	No	No	No	No	No	No	No	No	No	Yes	No	No	No	n.a.	n.a.	No	No	No	n.a.	No	No	No	No	n.a.	Yes	n.a.
Car rental	No	No	No	No	n.a.	n.a.	No	No	No	No	Yes	Yes	Yes	n.a.	n.a.	n.a.	No	No	No	No	No	No	No	No	n.a.	Yes	n.a.
Travel agencies	No	No	No	No	n.a.	n.a.	No	No	No	No	No	No	Yes	Yes	n.a.	n.a.	No	No	No	No	No	No	No	No	n.a.	Yes	No
Services in the field of tourism	Yes	Yes	No	Yes	n.a.	No	No	Yes	Yes	No	Yes	Yes	Yes	Yes	n.a.	n.a.	No	No	Yes	Yes	n.a.	No	n.a.	Yes	Yes	Yes	n.a.
Leisure services	n.a.	Yes	n.a.	Yes	No	No	No	Yes	No	Yes	Yes	Yes	Yes	Yes	n.a.	n.a.	Yes	n.a.	No	Yes	n.a.	No	Yes	Yes	Yes	Yes	n.a.
Sports centres	Yes	Yes	n.a.	Yes	n.a.	No	No	Yes	n.a.	Yes	Yes	Yes	Yes	Yes	n.a.	Yes	No	n.a.	n.a.	Yes	Yes	No	Yes	Yes	n.a.	Yes	No
Cultural services	n.a.	Yes	n.a.	Yes	n.a.	No	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	n.a.	n.a.	Yes	n.a.	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Amusement parks	No	Yes	No	n.a.	No	No	No	Yes	No	Yes	Yes	Yes	Yes	Yes	n.a.	Yes	No	n.a.	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	n.a.
Supply of electricity	No	No	n.a.	Yes	No	No	No	No	n.a.	No	No	Yes	Yes	Yes	No	Yes	n.a.	No	No	n.a.	No	No	No	Yes	Yes	Yes	n.a.
Telecommunication	No	No	n.a.	Yes	No	No	No	No	n.a.	No	No	Yes	Yes	Yes	No	Yes	No	No	No	No	No	No	Yes	Yes	Yes	Yes	n.a.
Postal Services	No	No	n.a.	Yes	No	No	No	No	n.a.	No	No	Yes	Yes	Yes	No	Yes	No	No	No	No	No	No	Yes	Yes	Yes	Yes	Yes

Legend
 Yes No n.a.

Source: Authors' own elaboration based on data collection conducted at the Member State level

3.3 What are the problem drivers?

The study identified one driver for each of the problems described above, i.e.:

- **Driver A:** There is limited acceptance across the EU of national disability cards and certificates of non-residents with disabilities issued by other Member States (equity failure).
- **Driver B:** National divergences in the implementation of the EU national parking cards for persons with disabilities hinder their mutual recognition across the Member States (regulatory failure).

The next two sections present the evidence related to each problem drivers.

3.3.1 Driver A: There is limited acceptance across the EU of national disability cards and certificates of non-residents with disabilities issued by other Member States (equity failure)

National disability cards are used to prove disability status, which is a pre-condition to assess disability-related benefits. The study found that **there is a high level of variance in terms of design and layout of national disability cards**. For instance, some Member States have paper disability cards and certificates (e.g., AT, DE, EL, HU, RO, SK), others opted for plastic cards (e.g. BE, CY, CZ, HR, IE, IT, LV, MT, NL, PL, SI), other for a mixed format (e.g. EE, LT, PT).¹¹²

Moreover, national variance relates to the types of benefits that national disability cards allow for. Such cards and certificates are indeed provided to persons with disabilities after an assessment of their disability status. Disability assessments are conducted at the national level based on criteria and procedures enshrined in national provisions of laws.¹¹³ Differences in the national approaches to disability assessment correspond to different understanding of disability and related needs, which in turn reflects in **a high level of variance in terms of preferential conditions available to persons with disabilities across the Member States**.

Box 4 below includes an overview of the main approaches used to undertake disability assessments across the Member States.

Box 4 – Main approaches to disability assessment¹¹⁴

- Medical approach, based on the diagnosed medical condition of individuals;
- Barema method, based on impairment tables showing the percentage of disability per type of impairment;
- Functional capacity assessment, focused on functional limitations to performing certain activities;
- Care and support needs assessment, based on the degree of the need for external help that the individual needs to care for himself/herself due to his/her health issues;
- Economic loss assessment, based on the calculation of the loss of income due to the disabilities under examination;
- Holistic approach, based on an assessment of impairment, functional capacity and environmental factors (e.g., surroundings, social context).

Source: Author's own elaboration based on desk research

It is important to note that disability status is often assessed based on a combination of two or more of these methods (see Table 6 below).

¹¹² Desk research conducted at the Member State level: AT, BE, CY, DE, EE, ES, HU, HR, IT, LV, MT, PL, SI, SK. Information for seven Member States (CZ, EL, FR, IE, LT, NL, PT) taken from materials shared by DG EMPL on the 7 March 2023 related to a workshop held in Paris in March 2021.

¹¹³ Lisa Waddington, Mark Priestley and Roy Sainsbury (2018), Disability Assessment in European States. Academic Network of Disability Experts (ANED) Synthesis Report. Available at: [link](#); Silvia Favalli, Delia Ferri (2016), Defining Disability in the European Union Non-discrimination Legislation: Judicial Activism and Legislative Restraints'. European Public Law 22, no. 3 (2016): 541–568.

¹¹⁴ Lisa Waddington, Mark Priestley and Roy Sainsbury (2018), Disability Assessment in European States. ANED Synthesis Report. Available at: [link](#).

Table 6 – Member States’ disability assessment methods¹¹⁵

Assessment methods	AT	BE	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IE	IT	LT	LU	LV	MT	NL	PL	PT	RO	SE	SI	SK	
Medical approach						✓	✓								✓		✓		✓	✓							✓	
Barema method			✓						✓	✓		✓	✓	✓		✓		✓					✓					
Functional capacity assessment	✓	✓			✓		✓						✓									✓		✓	✓			
Care and support needs assessment											✓											✓						
Economic loss assessment																						✓						
Holistic approach				✓				✓								✓											✓	

Source: Author’s own elaboration based on desk research

National variance is further increased by the fact that preferential conditions are mainly offered only on a voluntary basis, hence their provision is decided at the level of the individual service provider. Indeed, only few Member States have a legislative framework in place, which establishes what type of benefits the services, as defined in the internal market *acquis*,¹¹⁶ shall provide. Also, **variance also concerns preferential conditions made available to accompanying assistants** of persons with disabilities.

Annex V provides a detailed overview of preferential conditions made available by Member States to residents with disabilities for using certain services.

Differences described above turn into **limited acceptance of national disability status of persons with disabilities when they travel to or visit other Member States**.¹¹⁷ In this regard, 32% of persons with disabilities responding to the public consultation pointed out that their disability card is not accepted when they travel across the EU.¹¹⁸ Indeed, national authorities and/or service providers are sometimes reluctant to recognise disability cards issued by Member States that apply more lenient disability assessment criteria and procedures.¹¹⁹

National service providers consulted during the study complained that they **are not familiar with all national disability certificates issued above, hence they often end up not to accept them**, particularly when information is provided in foreign languages.¹²⁰

¹¹⁵ EDF, Disability Assessment and Social Protection. Available at: [link](#); ANED country reports on disability assessment. Available at: [link](#).

¹¹⁶ Services that are mainly provided for remuneration.

¹¹⁷ Survey targeted at Persons with Disabilities Q2.6 (See Annex VII); Workshop with CSOs held on 22 March, Workshop with NCAs held respectively on 23 March 2023; Targeted interviews with one academic expert (#2), one EU CSO (#5) and one EU body (#8)

¹¹⁸ See Annex I – section 2.2, results from the public consultation

¹¹⁹ European Parliament, Priestly (2022), Disability assessment, mutual recognition and the EU Disability Card. Study commissioned by the European Parliament’s Committee on Petitions [link](#)

¹²⁰ Workshop with service providers held on 11 May 2023.

Box 5 – Examples of national disability cards of non-residents that were not accepted when they travel to or visit other Member States

- Three German citizens with disabilities pointed out that:
 - They experienced difficulties in accessing preferential conditions for using trains or local public transport when travelling across the EU as their national disability cards were not accepted abroad
 - Their national disability card was not accepted when they travelled to Italy and Luxembourg
 - They experienced difficulties in accessing preferential conditions for using cultural services (e.g., museums, cultural events) when they travelled to France as their national disability cards were not accepted there
- A Hungarian citizen with disabilities stated that his national disability card was not accepted when he travelled to at least seven Member States (AT, CZ, DE, DK, FR, PL, SK)
- Three Austrian citizens with disabilities complained that their national disability cards are often not accepted when they travel to other Member States, hence they are often asked for additional documents to prove their disability status abroad.
- Two Austrian citizens with disabilities specified that their national disability cards were not accepted for accessing tourist facilities in Germany.
- Two persons with disabilities from Slovakia indicated that their national disability cards were not accepted when they tried to enter museums or to buy transport tickets in other Member States. Particularly, one of them specified that his national disability card was not accepted when he travelled to Czech Republic, thus he could not access discounts for public transport, ending up to pay the transport ticket at a full price.
- A French person with disabilities stated that preferential conditions to access museums in Spain are denied to non-residents with disabilities.
- A Latvian person with disabilities reported that his national disability card was not accepted for receiving discounts when using public transport in Italy as well as when entering museums in Denmark,
- The national disability card of a Polish person with disabilities was not recognised when he travelled to Croatia. The same happened to a Romanian person with disabilities that travelled to Hungary as well as to a Belgian resident with disabilities that travelled to Spain for tourism purposes. The national disability card of a Belgian person with disabilities was not accepted in France, particularly when he used French railways, or when accessing French museums
- To conclude, anecdotal evidence was provided by a blind person complaining that his disability certificate, which contains a printed blind person's pictogram, was not accepted when he travelled across the EU, and particularly to Czech Republic and Slovakia.
- Also, the national disability card of a German citizen with disabilities was not accepted when he travelled to Hungary, hence he could not access public transport discounts.
- A Belgian public authority confirmed that non-residents with disabilities cannot benefit from preferential conditions granted to Belgian citizens with disabilities when using trains in Belgium, nor can their accompanying assistants travel free of charge on the same basis as accompanying assistants of Belgian citizens with disabilities
- Other two NCAs from Member States that participated in the EDC pilot project reported to have received a high number of complaints from cardholders as their EDC was not accepted in other Member States that did not adhere to the initiative.¹²¹

Source: Author's own elaboration based on desk research

3.3.2 Driver B: National divergences in the implementation of the EU parking cards for persons with disabilities hinder their mutual recognition across the Member States (regulatory failure)

Council Recommendation 98/376/EC¹²² (amended by Council Recommendation 2008/205/EC¹²³) introduced the EU parking card model for persons with disabilities. However, **the implementation of the EU parking card presents some shortcomings due to differences across the Member States in terms of the design of the card, as well as associated rights and enforcement rules.** National differences mainly regard (i) the card's layout, (ii) the parking rights granted to cardholders and (iii) the control and enforcement of the parking card.

¹²¹ Workshop with NCAs held on 23 March 2023.

¹²² 98/376/EC: Council Recommendation of 4 June 1998 on a parking card for people with disabilities. Available at: [link](#).

¹²³ 2008/205/EC: Council Recommendation of 3 March 2008 adapting Recommendation 98/376/EC. Available at: [link](#).

More specifically, with respect to the model and layout of the card, **Annex I to the Recommendation sets out clear but minimum and outdated provisions, with no security features being required to prevent frauds and forgeries of the card.** Frauds consist in the use of a parking card of someone else, including a deceased person, or in using both a duplicate card and the original one at the same time. For example, between November 2018 and January 2019, 71,219 EU parking cards had been checked in Belgium and, in almost 10% of the cases, there appeared to be a misuse. Most of the times, the EU parking card of a deceased person was used, or the original card was still used even if a duplicate had been issued.¹²⁴ With respect to forgeries, these occur when a copy of the EU parking card belonging to someone else is used or when the rightful owner makes copies of the EU parking card to use it on more than one vehicle simultaneously. For example, in Malta, in 2022, 110 cards in the car park of an important hospital were found to be copies.¹²⁵

With a view to tackling such challenges, some Member States have introduced additional features on the card not originally foreseen in the Recommendation, such as holograms, QR codes, etc.¹²⁶ Moreover, digitalised ways of controlling parking rights, which are increasingly focused on the car plates rather than on the paper-based parking card, have been introduced in order to tackle new types of frauds and forgeries resulting from the technological progress. For example, Belgium added a QR code that can be scanned through an app ('Handi2park') used by the police to check the card validity. Holograms are expressly included on EU parking cards issued in Italy, Malta, Slovakia and Sweden to make sure that copies of the card are recognisable, preventing possible forgeries. Moreover, in Sweden also a barcode has been introduced as copied cards were commonly found to be used in vehicles. Such actions have resulted in **different design and layout of the card**, depending on the Member State where it is issued.

Table 7 – Examples of additional features with respect to the standard EU-model parking card

Additional security feature	AT	BE	DK	ES	FI	IE	IT	MT	NL	PL	SE	SK
Barcode					✓	✓					✓	
Hologram		✓	✓	✓	✓		✓	✓	✓	✓	✓	✓
QR code		✓	✓	✓								
NCF ('Near field communication') tag for wireless detection				✓								
Unique number (national or regional)		✓		✓								
Anti-copying paper	✓							✓				✓

Source: Author's own elaboration based on desk research

¹²⁴ Parking Card for Persons with Disabilities: questions for the experts of the High-Level Group on Disability (shared by EC, not published).

¹²⁵ Information shared by the Commission for the Rights of Persons with a Disability.

¹²⁶ Minutes from the EU Disability High-Level Group meeting 14 May 2019 – 9.30 to 16.30. Available at: [link](#).

Differences in the layout of the EU parking card sometimes even occur within a single Member State, when the card is issued at the local level (e.g. if the logo of the municipality is included), thus resulting in different parking card models in circulation across different regions of a single country.¹²⁷ A further element of complexity is the coexistence of older and newer models of cards. For example, since 2017, in France the EU-model parking card is progressively being replaced by a new non-EU model parking card, i.e. the CMI ('Carte mobilité inclusion'), yet both models are currently valid and in use until end of 2026.

In the end, **national differences result in practical difficulties for persons with disabilities in having their parking card recognised when travelling by car to another Member State**.¹²⁸ While the visual format is still easy to recognise thanks to the international disability symbol representing a wheelchair, the text displayed on the EU parking card is usually printed in the national language of the Member State where the card is issued, and the physical dimension does not allow for the inclusion of text in multiple languages. Therefore, its meaning is not immediately clear to local authorities or service providers of other Member States where the card is used, unless they can understand the text written in the foreign language.¹²⁹

Secondly, **the conditions and benefits granted to the EU parking cardholders differ across countries**, as presented in Table 7.

Table 8 – Examples of national differences in the rights granted by the EU parking card

Member States	Reserved parking spaces	Parking on roads where it is generally prohibited ¹³⁰	Free parking in paid parking areas	No time limit in parking areas subject to time limits	Parking in pedestrian zones
Austria	✓				
Belgium	✓				
Bulgaria	✓				
Croatia	✓				
Cyprus	✓		✓	✓	
Czech Republic	✓	✓			✓ ¹³¹
Denmark		✓ ¹³²	✓	✓	✓ ¹³³
Estonia		✓	✓	✓	
Finland	✓	✓	✓	✓	
France	✓		✓	✓	
Germany		✓	✓	✓	✓ ¹³⁴
Greece	✓			✓	
Hungary		✓	✓	✓	✓
Ireland	✓				
Italy	✓	✓	✓		
Latvia					
Lithuania	✓	✓	✓ ¹³⁵	✓	

¹²⁷ Do not take my spot! – The EU Disability Parking Card. Available at: [link](#). Survey targeted at national CSOs Q3.6: one respondent.

¹²⁸ Do not take my spot! – The EU Disability Parking Card. Available at: [link](#).

¹²⁹ European Parliament (EP) Research (2022) Disability assessment, mutual recognition and the EU Disability Card - Progress and opportunities. Available at: [link](#).

¹³⁰ If not causing obstructions.

¹³¹ Granted only in individual cases and if urgently necessary.

¹³² Granted for maximum 15 minutes.

¹³³ Granted only if explicitly allowed by local concessions and during the specified times.

¹³⁴ Granted only if explicitly allowed by local concessions and during the specified times.

¹³⁵ Granted only in spaces marked with a wheelchair symbol.

Member States	Reserved parking spaces	Parking on roads where it is generally prohibited ¹³⁰	Free parking in paid parking areas	No time limit in parking areas subject to time limits	Parking in pedestrian zones
Luxembourg	✓				
Malta	✓				
Netherlands	✓	✓ ¹³⁶			
Poland	✓	✓			
Portugal		✓ ¹³⁷			
Romania					
Slovakia	✓		✓		
Slovenia	✓				
Spain					
Sweden	✓	✓ ¹³⁸	✓	✓	✓ ¹³⁹

Source: Author's own elaboration based on desk research

Evidence from the case studies show that the **conditions granted to parking cardholders also differ within countries and are often decided at municipality level**. For example, in Belgium, some cities grant free parking in all public parking spaces to parking cardholders while other cities only grant free parking in specific spots. In France, parking cardholders benefit from free parking on all public parking spaces but with a time limit that differ across municipalities. As reported by national CSOs interviewed during the case studies, there is a **lack of overview and information on the conditions granted to cardholders across municipalities and across the Member States**, which creates uncertainty and confusion to cardholders travelling within and across Member States. This may cause discouragement to travel as persons with disabilities often do not know the concessions they are granted when travelling by car, and results in fines when they assume wrongly that the same conditions apply as in their place of residence (see also section 3.1.2).

Thirdly, Member States, or sometimes even municipalities within a Member State, adopt **different approaches to control the validity and the proper use of the EU parking card** within their territory. Moreover, overall, the parking and traffic control methods are becoming more and more digitised and focused on automated checks on the car plate, rather than on manual checks on the paper-based EU parking card.¹⁴⁰ Automatic checks on car plates of parked vehicles or of those circulating in limited access areas are automatically performed by cameras communicating with databases of car plates, which include information on the concessions linked to those car plates, such as resident permits or parking cards. According to an EU-level parking association interviewed during the study, the adoption of this kind of approach is increasing across the EU, and both national (e.g. NL) and local databases (e.g. Lisbon) are established, where parking cards are linked to a vehicle and can be checked easily.¹⁴¹ Evidence from the case studies show that, in cities where automatic checks are performed, parking cardholders have to register their parking card to their car plate in a local platform (e.g. in Brussels or Milan), but this means that parking cardholders have to register in a different local platform in each city visited. Thus, divergences in the way of checking parking cards leave great uncertainty to cardholders on the rules they must respect when travelling to another Member State by car. In this respect, persons with disabilities are still often forced to communicate with local authorities of the city they are going to visit to inform them that they hold the EU parking card and to ask how to use it, in order to avoid possible fines.

¹³⁶ Granted for maximum 3 hours.

¹³⁷ Granted only in case of absolute necessity, for a short time and without obstructing other vehicles or pedestrians.

¹³⁸ Granted for maximum 3 hours.

¹³⁹ Granted for maximum 3 hours.

¹⁴⁰ Targeted interview with one EU Parking association (#3).

¹⁴¹ Ibid.

National differences have been further exacerbated by the fact that the Recommendation does not contain any provisions for coordination amongst the Member States on the monitoring of the card, leading to a lack of transparency information on the rights granted by national cards as well as on national mechanisms to check parking rights and related infringements.¹⁴² All these factors resulted in increasing variance in the design of cards issued across countries, as well as in their implementation and enforcement.

3.4 Who is affected and how?

3.4.1 Overview

Table 9 below presents an overview of the consequences of identified problems on **citizens**, **public authorities** and **businesses**. Most of such negative effects concern citizens who, for the purpose of this study, are mainly intended as persons with disabilities.

Table 9 – Overview of who is affected and how by the identified problems

Stakeholder category	Type of consequence
Citizens	<p>Persons with disabilities may be discouraged to travel to or visit other Member States, as they are unsure regarding whether, and what type of, disability-related preferential conditions will be available to them in the host Member State.¹⁴³ Indeed, in the lack of mutual recognition of disability status, the decision whether to offer preferential conditions also to persons with disabilities coming from other Member States is at discretion of the individual service provider.¹⁴⁴ In many countries, there is no overview either of service providers who offer preferential conditions or of what types of benefits are available. Therefore, there is limited information on both the type of preferential conditions and the services for which they are offered. Indeed, there is neither a EU-wide database nor systematic monitoring and collection of such information at the national level. The sole exceptions are the eight Member States that participated in the pilot EDC, where databases exist containing information of national service providers participating in the pilot scheme. Also, in Slovakia, there is a national database including a list of public service providers (i.e. organisations that are operated by ministries and other national bodies) and the types of preferential conditions they offer, alongside information on how to obtain a national disability card. The website also states that in addition to the providers contained in this list, there are many private providers who may offer preferential conditions on their own merit.</p> <p>Finally, not all service providers have websites in other than national language and/or provide information on preferential conditions. Therefore, even if persons with disabilities want to prepare themselves and learn about potential preferential conditions before their travel, they need to get in touch directly with each separate service provider in order to learn what type of preferential conditions they may be eligible for. Such preparation is often demanding in terms of time spent and effort to obtain information as not all service providers may speak a foreign/common language.¹⁴⁵</p> <p>Public authorities, CSOs and persons with disabilities consulted during the study,¹⁴⁶ as well as respondents to the public consultation, pointed out that such uncertainty</p>

¹⁴² The last Commission request for information to Member States on the implementation of the EU parking card dates from 2019 and was discussed in the High-Level Group on Disability in 2019.

¹⁴³ Workshop with CSOs held on 22 March 2023.

¹⁴⁴ Targeted interview with one representative from academia (#2).

¹⁴⁵ Workshop with service providers held on 11 May 2023.

¹⁴⁶ Survey targeted at Persons with Disabilities Q2.5; Survey targeted at national CSOs Q2.7 (see Annex VII); Targeted interviews with two EU-level CSO (#3) and (#5); Workshop with CSOs held on 22 March 2022; Workshop with NCA held on 23 March 2023.

Stakeholder category	Type of consequence
	<p>discourages persons with disabilities from travelling abroad. Specifically, this issue was pointed out by 82% of EU citizens, more than a half of public authorities and the huge majority of CSOs (57 out of 66) responding to the public consultation; 505 respondents were persons with disabilities.¹⁴⁷ Along the same line, research shows that vacation decision-making is far more complex for persons with disabilities than persons without disabilities, due to potentially greater logistic and economic hurdles, making them less likely to travel compared to persons without disabilities.¹⁴⁸</p> <p>Similarly, the divergences in the design of the EU parking card and related rights lead to uncertainty for persons with disabilities as to whether their card will be accepted when travelling to another Member State and which rights (e.g. free parking, unlimited parking) will be granted. This uncertainty may discourage them from travelling and has, on a number of occasions, resulted in fines due to the non-recognition of their card.¹⁴⁹ As anecdotal evidence, a representative from an EU-level parking association interviewed during the study explained that when arranging a trip abroad, persons with disabilities tend to make sure that they will have a parking space at the destination and some prefer to reserve a private garage in case they cannot count on the availability of parking for persons with disabilities in the street.¹⁵⁰</p> <p>Relatedly, the study found evidence that the participation in tourism of EU citizens with disabilities is remarkable lower than persons without disabilities. While the number of EU citizens moving to other countries and travelling abroad has been overall increasing over the years, the percentage of persons with disabilities moving across the EU remains low. More precisely, there is evidence that persons with disabilities make 10–30% fewer trips than those without disabilities, particularly in case of non-work-related trips.¹⁵¹</p> <p>Limitations to travelling are detrimental for the overall wellbeing of persons with disabilities. Indeed, travelling contributes to enhancing a person’s development, quality of life, and social inclusion.¹⁵² It also contributes to the individual’s sense of freedom, by escaping from normal routine, as well as to overcoming self-doubt and building self-confidence.¹⁵³</p>
Public Authorities	Besides consequences for persons with disabilities, the lack of mutual recognition of disability status in the EU has negative effects also for national public authorities.

¹⁴⁷ See Annex I – section 2.2, results from the public consultation.

¹⁴⁸ European Commission (2022), Call for evidence for an impact assessment. Available at: [link](#); Elisabeth Kastenholtz, Celeste Eusébio & Elisabete Figueiredo (2015), Contributions of tourism to social inclusion of persons with disability, 30(8) Disability & Society, 1259-1281; Keunhyun Park, Hossein Nasr Esfahani, Valerie Long Novack, Jeff Sheen, Hooman Hadayeghi, Ziqi Song & Keith Christensen (2023), Impacts of disability on daily travel behaviour: A systematic review, 43(2) Transport Reviews 178-203; Pagán (2012), Time allocation in tourism for people with disabilities’ 39(3) Annals of Tourism Research 1514–1537.

¹⁴⁹ SOLVIT complaints 2018-2022.

¹⁵⁰ Targeted interview with one EU Parking association (#3).

¹⁵¹ Keunhyun Park, Hossein Nasr Esfahani, Valerie Long Novack, Jeff Sheen, Hooman Hadayeghi, Ziqi Song & Keith Christensen (2023), Impacts of disability on daily travel behavior: A systematic review, 43(2) Transport Reviews 178-203.

¹⁵² Elisabeth Kastenholtz, Celeste Eusébio & Elisabete Figueiredo (2015), Contributions of tourism to social inclusion of persons with disability, 30(8) Disability & Society, 1259-1281.

¹⁵³ Bodil Stilling Blichfeldt & Jaqueline Nicolaisen (2011), Disabled travel: not easy, but doable, 14(1) Current Issues in Tourism 79-102.

Stakeholder category	Type of consequence
	<p>Firstly, public authorities receive requests for clarifications from non-residents with disabilities who ask whether their national card is accepted in their country. Also, requests for clarification concern what types of preferential conditions they can access in the host Member State.</p> <p>Similarly, the lack of coordination of Member States on the implementation of the EU parking card translates in a range of enquiries of citizens (persons with disabilities or other persons on their behalf) about whether national parking cards are accepted in other Member States as well as what rights are granted there. Among the SOLVIT enquiries received between 2018 and 2022, in around 25% of cases it was asked if the EU parking card is actually recognised across the Member States, and around 30% of submissions concerned questions on the rights granted to cardholders when visiting another Member State. In most cases, the SOLVIT platform advised the persons to contact directly the national or local authorities responsible for the implementation of the EU parking card. Also, as stated by a representative of an EU-level parking association interviewed during the study, parking police authorities are sometimes unsure whether EU parking cards of non-residents are accepted in their Member State.¹⁵⁴ Hence, they do not know whether to fine or not a car parked on a designated space reserved to holders of the EU parking card for persons with disabilities.¹⁵⁵</p> <p>Moreover, there is evidence that national differences in the design and implementation of the EU parking card contribute to increasing overall enforcement costs for public authorities. Specifically, as reported by the representative of an EU-level parking association interviewed during the study, the increasing divergences in the design of the EU parking card across the Member States have raised the need to provide parking controllers with training on the different types of cards in place.¹⁵⁶</p>
<p>Businesses</p>	<p>Differences in terms of format of national disability cards and certificates make it not easy and immediate for private service providers to recognise national disability cards, hence providers face extra burden due to a lengthy process of documents checks.¹⁵⁷</p> <p>Also, the majority of service providers consulted during the study claimed that they receive requests from persons with disabilities on whether they would be able to receive preferential conditions in access to their services.¹⁵⁸ Hence, they spend time to address all such requests for clarifications.</p>

3.4.2 Focus on the participation in tourism of EU citizens with disabilities

This section focuses on the participation in tourism of EU citizens with disability with a view to showing how and the extent to which the lack of recognition of disability status hinders the exercise of free movement rights for persons with disabilities in the EU. To this end, the analysis focuses on tourism behaviour of persons with disabilities across the Member States. It started from available Eurostat statistics on the share of Member States' population that is "participating

¹⁵⁴ Targeted interview with one EU Parking association (#3).

¹⁵⁵ Ibid.

¹⁵⁶ Ibid.

¹⁵⁷ Survey on costs targeted at service providers Q16 (See Annex VII); Workshop with service providers held on 11 May 2023; European Commission, Directorate-General for Employment, Social Affairs and Inclusion, Chiattelli, C., Abbasciano, C., Schizzerotto, A., et al., (2021), Study assessing the implementation of the pilot action on the EU Disability Card and associated benefits: final report. Available at: [link](#).

¹⁵⁸ Survey on costs targeted at service providers Q10 (See Annex VII); Respondents to the online workshop with CSOs held on 22 March 2023 and the online workshop with NCAs held on 23 March 2023; Workshop with service providers held on 11 May 2023.

in tourism" (i.e. travelling for at least one overnight stay in a domestic, foreign country or both) for personal reasons.¹⁵⁹ Break-down data are also available by age group, i.e. the share of the population aged 15-64 that is travelling.¹⁶⁰

Although data are available on Member States' tourism patterns, **information on tourism behaviours of persons with disabilities is scarce**. At the national level, statistics on inflows of tourists with disabilities are available only for Slovenia, as the country's tax system exempts persons with disabilities from payment of the tourist tax, leading to the collection of data on their presence. At the EU level, available survey data on travel patterns of persons with disabilities aged 15-64 from mid-2012 to mid-2013¹⁶¹ provide estimates of their "participation in tourism" (i.e. the share of persons with disabilities¹⁶² travelling for at least one overnight stay). Despite dating back to 2012, these data provide a valuable picture of the condition and needs of persons with disabilities engaging in tourism, collecting information in a consistent way for all Member States, except Croatia. The information was thus combined with the aforementioned Eurostat statistics on the share of the general population participating in tourism and was used to calculate the difference in participation in tourism between the general population and the sub-group of persons with disabilities in 2012.

The information for the year 2012 may not fully reflect recent changes in travelling patterns of the general population due to economic, social or political changes, which occurred in the past decade; the rate of participation in tourism for most Member States increased between 2012 and 2019. Given that trends in tourism of the general population may be expected to also affect persons with disabilities, the 2012 gap in participation in tourism between the two groups was applied to the data for 2019 on the general population to obtain a "corrected" estimate of the share of persons with disabilities travelling in more recent years. This share was then multiplied by the number of persons reporting "severe" disabilities to obtain an estimate of the number of persons with disabilities travelling in 2019. The use of the "severe" disabilities data was justified by their resemblance with the number of persons with recognised disability status, graphically portrayed in Figure 3 above. Such information thus allows to obtain a more accurate estimate of the size of the group of persons with recognised disabilities travelling, and potentially benefitting from preferential conditions thanks to their recognised disability status. In light of this, and to increase the sensitivity of these values, the participation in tourism share was also applied to the number of persons with recognised disability status whenever the information was available, obtaining a range where the actual number of persons with recognised disabilities travelling may fall. The year 2019 was chosen as the most representative of the current situation. The disruptions to travelling patterns due to the COVID-19 epidemic in 2020 and 2021 can be indeed expected to have altered tourism behaviour for both the general population and persons with disabilities due to external factors, thus they have been discarded for the purpose of this study.

The resulting estimates are important to provide a more accurate picture of the recent situation in terms of participation in tourism of persons with disabilities. Furthermore, the comparison of the shares of the general population participating in tourism and of persons with disabilities in 2012, provided in Table 1 and Figure 7, conveys a key takeaway: **tourists with disabilities travel considerably less than the general population**. Such gap appears to be persistent for all Member States except Greece, where persons with disabilities appear to travel more, in relative terms, than the general population. While, as anticipated, these data refer to 2012 because of the scarcity of information for more recent years, the study team can hardly expect the gap to have closed in recent years, both because of the high disparity in travelling patterns shown and because of the absence of major policies at the country level targeting tourism of persons with disabilities.

¹⁵⁹ Eurostat database, tour_dem_totot. Available at: [link](#).

¹⁶⁰ Eurostat database, tour_dem_toage. Available at: [link](#).

¹⁶¹ Economic Impact and Travel Patterns of Accessible Tourism in Europe - Full Report, 08/03/2015. Directorate-General for Enterprise and Industry, now known as Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs (DG GROW), European Commission. Available at: [link](#).

¹⁶² In the survey data on travelling patterns of persons with disabilities, disability was proxied using a functional definition.

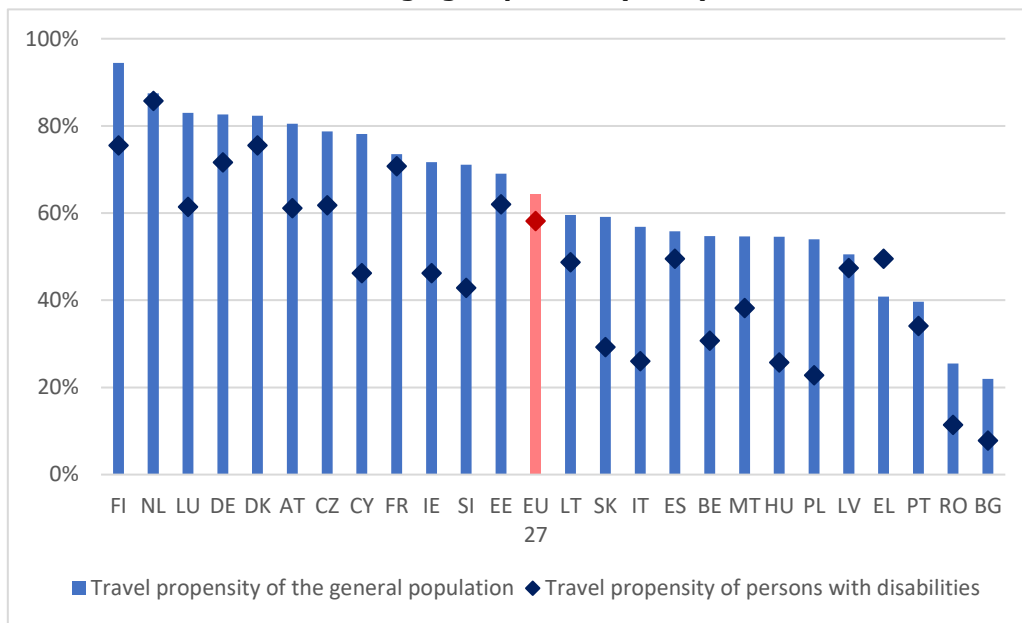
Table 10 – Data on tourism and travel patterns of the general population and persons with disabilities between 2012 and 2019

Member State	Share of persons aged 15-64 participating in tourism, 2012	Share of persons with disabilities participating in tourism, 2012-2013	Participation gap in tourism, 2012	Share of persons aged 15-64 participating in tourism, 2019	Estimated number of persons with disabilities participating in tourism, 2019
Austria	80.5%	61.1%	19.4	81.8%	497,185
Belgium	54.7%	30.7%	24.0	70.7%	278,866-492,085
Bulgaria	22.0%	7.8%	14.2	45.7%	70,645- 134,472
Croatia	59.5%	n.a.	n.a.	61.6%	n.a.
Cyprus	78.1%	46.2%	31.9	79.8%	7,186-28,532
Czechia	78.8%	61.8%	17.0	83.8%	548,149
Denmark	82.3%	75.5%	6.8	61.0%	182,395
Estonia	69.0%	62.0%	7.0	82.7%	101,191-115,245
Finland	94.4%	75.5%	18.9	86.6%	283,699
France	73.5%	70.7%	2.8	72.2%	4,283,903
Germany	82.6%	71.6%	11.0	81.3%	4,143,895-5,483,607
Greece	40.9%	49.5%	-8.6	46.4%	561,075
Hungary	54.6%	25.7%	28.9	63.4%	141,153-240,039
Ireland	71.7%	46.2%	25.5	77.0%	128,978
Italy	56.9%	26.0%	30.9	50.9%	630,326-646,354
Latvia	50.5%	47.4%	3.1	64.3%	101,065- 132,538
Lithuania	59.6%	48.7%	10.9	67.8%	6,531-103,312
Luxembourg	83.0%	61.4%	21.6	85.7%	29,938
Malta	54.6%	38.2%	16.4	74.2%	7,419- 12,368
The Netherlands	87.5%	85.7%	1.8	86.6%	733,160
Poland	54.0%	22.8%	31.2	71.1%	1,152,633-1,755,226
Portugal	39.6%	34.1%	5.5	51.4%	372,328
Romania	25.5%	11.4%	14.1	32.4%	158,038-212,683
Slovakia	59.1%	29.2%	29.9	78.6%	244,351
Slovenia	71.1%	42.8%	28.3	75.7%	86,712
Spain	55.8%	49.5%	6.3	76.3%	1,248,111-2,342,459
Sweden	n.a.	75.5%	n.a.	76.1%	n.a.
EU 27	64.4%	58.1%	6.3	69.1%	19,334,354

Source: Authors' own elaboration based on Eurostat data and DG GROW's report on accessible tourism in Europe¹⁶³

¹⁶³ Economic Impact and Travel Patterns of Accessible Tourism in Europe - Full Report, 08/03/2015. Directorate-General for Enterprise and Industry, now known as Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs (DG GROW), European Commission. Available at: [link](#).

Figure 7 – Participation in tourism of the general population and persons with disabilities in the age group 15-64 (2012)



Source: Authors’ own elaboration based on Eurostat data and DG GROW’s report on accessible tourism

3.4.3 Examples of requests for clarification received by public authorities

One NCA consulted during the study reported to have received different inquiries from tourists asking whether their national disability cards are actually accepted in her Member State.¹⁶⁴ Other two National Competent Authorities (NCAs) from Member States that participated in the EDC pilot project reported to have received a high number of complaints from cardholders as their EDC was not accepted in other Member States that did not adhere to the initiative.¹⁶⁵

The box below provides some examples of requests for clarification received by SOLVIT.

¹⁶⁴ Ibid.

¹⁶⁵ Workshop with NCAs held on 23 March 2023.

Box 6 – Examples of requests for clarification received by SOLVIT

- An Austrian citizen travelling to Hungary asking (i) if the Austrian disability card is accepted in Hungary; (ii) information about the type of preferential conditions to which the card gives access. The citizen also raised the absence/difficulties to source any information about where to use the card, how the card works and the scope of the associated benefits.
- Another Austrian citizen travelling to France asking if it will be possible to access France's disability benefits using the Austrian card.
- A Slovakian citizen travelling to Austria for tourism purposes asking if his/her national disability card is accepted in Austria for getting discounts
- A Hungarian citizen travelling to Croatia asking if his/her national disability card is accepted in Croatia.
- A citizen asking if a disability card from an EU Member State gives one access to free public transport and highway tolls benefits in other EU Member States.
- A German citizen asking if the German card is accepted in other EU countries and if the card from other EU Member States is accepted in Germany.
- A German citizen staying in a non-specified EU country asking if it is possible to access disability benefits outside Germany using the German card.
- A Spanish citizen asking how to use the card both for parking (leaving the card in the parked car) and for accessing places (e.g. museum) and preferential conditions (discounts) abroad.
- A Spanish citizen travelling to the Netherlands asking if the Spanish Disability Card is accepted in the Netherlands.

Source: Author's own elaboration based on enquiries submitted on the SOLVIT platform

3.4.4 How likely is the problem to persist?

Member States where preferential conditions for persons with disabilities are in place, either on a mandatory or voluntary basis, are likely to keep them in the future. However, most Member States have not undertaken significant action to promote access to the same preferential conditions as residents for persons with disabilities travelling from other countries within the EU for short periods. At the same time, it is unlikely that the positive effects of the pilot EDC¹⁶⁶ will increase in time if additional Member States do not join the initiative and access to preferential conditions is not extended to a higher number of service providers and to other sectors such as transport. Moreover, even though there is evidence that the EDC has often been accepted as a proof of disability in Member States not participating in the pilot project or even in non-EU countries, as outlined in previous sections, uncertainty regarding the access to preferential conditions remains high among persons with disabilities. Also, the limited information available as to which service providers offer preferential conditions or how such preferential conditions can be accessed is expected to continue creating difficulties in the mobility of persons with disabilities. Overall, in case of no action, persons with disabilities are likely to continue facing uncertainty about access to preferential conditions when travelling abroad within the EU. When they travel to other Member States, the recognition of their national disability cards and certificates will remain voluntary and limited when it comes to preferential conditions when accessing services. For the positive effects of the pilot EU Disability Card to be extended, all Member States should join the initiative

With regard to the EU parking card, its positive role in promoting the free movement and parking rights of persons with disabilities will continue. However, the problems with its recognition among Member States are expected to increase due to technical and digital developments which increase the divergence of the models. **Technological developments are expected to bring additional challenges to its use and mutual recognition.** Indeed, new and emerging technologies are increasingly (mis)used to develop more sophisticated forgery and fraud mechanisms. On this point, a representative from an EU-level parking association interviewed during the study pointed out that the current paper copy solution is not in line anymore with technological progress, ultimately exposing the EU parking cards to new types of frauds and forgeries.¹⁶⁷ As a consequence, at least 12 Member States had included additional security features in the parking card's design by spring, and this resulted in increasing variance in the design of the cards issued across the Member States. Such variance may continue

¹⁶⁶ European Commission, Directorate-General for Employment, Social Affairs and Inclusion, Chiattelli, C., Abbasciano, C., Schizzerotto, A., et al., (2021), Study assessing the implementation of the pilot action on the EU Disability Card and associated benefits: final report. Available at: [link](#).

¹⁶⁷ Targeted interview with one EU Parking association (#3).

diverging even more in the future, as Council Recommendation 98/376/EC does not contain coordination and monitoring provisions in terms of the card's format and layout.

Moreover, **technological innovation is also affecting the way in which parking rights are controlled**. Indeed, parking control is more and more digitalised and automated. According to a parking association representative, an increasing number of Member States uses the ANPR (automatic number-plate recognition), with an automatic camera that picks the car plate number to recognise it and can check if there is an EU parking card linked to the specific vehicle.¹⁶⁸ Thus, the paper-based format of the EU parking card will not be adequate anymore if these kinds of innovation are increasingly adopted across the Member States. The increasing divergences in parking control methods and card format (paper-based or registered in a database in relation to the car plate) may create further problems for mutual recognition of the card, determining further difficulties in the exercise of free movement for persons with disabilities.

Besides the EDC pilot project and the EU parking card for persons with disabilities, there are **other EU pieces of legislation that have been enacted in the past years and may have a positive impact on the travelling patterns of persons with disabilities**. Directive 2019/882, known as the European Accessibility Act, was approved in 2019 with the aim of removing barriers created by diverging rules on the accessibility of products and services across the EU.¹⁶⁹ The Directive's transposition deadline is 28 June 2030. Its implementation in sectors such as transport may have a positive effect on the participation in tourism of persons with disabilities across the EU, thanks to greater reliability on common accessibility criteria. At the same time, Directive (EU) 2016/2102, known as the Web Accessibility Directive, was adopted in 2016 with the aim to improve the accessibility of online websites and apps of public sector bodies across the EU.¹⁷⁰ This may have further favoured tourism opportunities for persons with disabilities, by facilitating the collection of information on the destinations of their trips within the EU. Furthermore, a set of EU Regulations establishing the rights of passengers with reduced mobility have further improved the conditions for accessible tourism in Europe, by harmonising overtime rules on the rights of persons with disabilities travelling within the EU. The Regulations cover the main modes of transport, including air travel,¹⁷¹ travel by sea and inland waterways¹⁷² and travel by bus or coach.¹⁷³ Travel by train is also included, with Regulation (EU) 2021/782 on rail passengers' rights and obligations recently amending Regulation (EC) 1371/2007.¹⁷⁴

Existing trends in the share of Persons with Disability within the EU population may also contribute to shaping how the identified problems are likely to evolve in the future. Using EU SILC data, the share of the population aged 16 or older reporting "some" or "severe" disability has remained virtually unchanged in the past decade, being stable at around one quarter of the total population and increasing by 1% in the past 5 years.¹⁷⁵ However, **the phenomenon of population ageing has in parallel led to a growth in the share of the total EU population aged 65 or older**.¹⁷⁶ The trend is stronger in Member States such as Finland, Poland, and Portugal, but has been detected across all Member States, and has been predicted to continue in the future.¹⁷⁷ **The incidence of disability is estimated to be higher in this age category:**

¹⁶⁸ Ibid.

¹⁶⁹ European Parliament and Council, Directive 2019/882 of 17 April 2019 on the accessibility requirements for products and services. Available at: [link](#).

¹⁷⁰ European Parliament and Council, Directive 2016/2102 of 26 October 2016 on the accessibility of the websites and mobile applications of public sector bodies. Available at: [link](#).

¹⁷¹ European Parliament and Council, Regulation (EC) 1107/2006 of 5 July 2006 concerning the rights of disabled persons and persons with reduced mobility when travelling by air. Available at: [link](#).

¹⁷² European Parliament and Council, Regulation (EU) 1177/2010 of 24 November 2010 concerning the rights of passengers when travelling by sea and inland waterway and amending Regulation (EC) 2006/2004. Available at: [link](#).

¹⁷³ European Parliament and Council, Regulation (EU) 181/2011 of 16 February 2011 concerning the rights of passengers in bus and coach transport and amending Regulation (EC) 2006/2004. Available at: [link](#).

¹⁷⁴ European Parliament and Council, Regulation (EU) 2021/782 of 29 April 2021 on rail passengers' rights and obligations (recast). Available at: [link](#).

¹⁷⁵ Eurostat database, h1th_silc_12. Available at: [link](#). EU SILC data on the shares of the population by functional limitations are only available for persons aged 16 years or older.

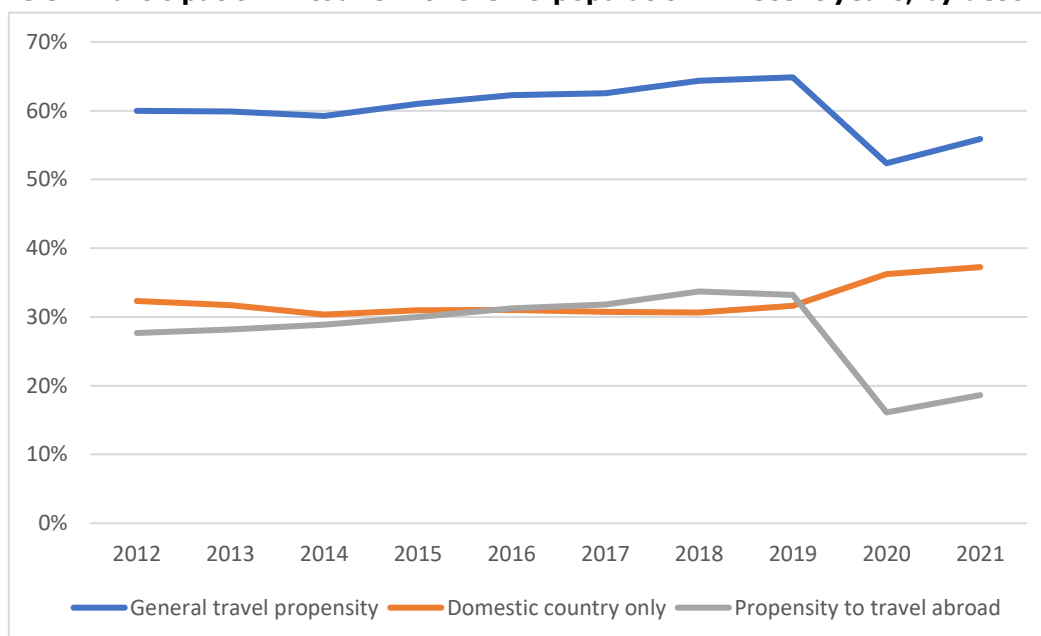
¹⁷⁶ Eurostat database, demo_pjan_broad. Available at: [link](#).

¹⁷⁷ Eurostat Statistics Explained: Population structure and ageing (2023). Available at: [link](#).

while in the population aged 16 to 64 only 18% have “some” or “severe” disability, the figure increases to around half of all persons aged 65 or older.¹⁷⁸ **This trend can thus be expected to further expand the proportion of the population of persons with disabilities in the coming decades**, as the aging process continues. However, its effect in the next decades may be ambiguous. On the one hand, persons with disabilities aged 65 or older already benefit from preferential conditions (such as discounts or reduced fees) granted according to age requirements for services across the EU, thus presenting a reduced need for a harmonised tool such as the EDC. On the other hand, however, the higher incidence of disability in this age bracket may still bring a surge in the need for preferential conditions targeted at persons with disabilities, such as personalised services and assistance, whose recognition cannot be demonstrated using ID Cards and would be made uncertain by the lack of a uniform disability proof, to the detriment of persons with disabilities.

The dynamics in travelling patterns of the general population in the future are also important in order to understand the evolution of identified problems. In recent years, the share of persons participating in tourism in the Member States has constantly increased.¹⁷⁹ Figure 9 depicts the participation in tourism in the years from 2012 to 2021, with a significant rise from 60% to 65% until 2019. In the years 2020 and 2021, the graph shows a drop in the share of the population participating in tourism (even though the share of persons travelling in their home country only increases slightly). This is likely due to the consequences of the Covid-19 pandemic, for instance the result of travel restrictions, increased economic uncertainty and many other factors. It can be expected, however, that the share of persons participating in tourism in the future will revert to its pre-pandemic trend, at least in the absence of any major social or economic shock.¹⁸⁰ In this context, **to the extent that the gap between the participation in tourism of persons with disabilities and the general population remains unaltered, the disparity between the two population groups already shown in Figure 8 will persist as uncertainty linked to lack of knowledge on recognition of disability status to access preferential conditions does not change.**

Figure 8 – Participation in tourism of the EU population in recent years, by destination



Source: Author’s own elaboration based on desk research

¹⁷⁸ Eurostat database, hlth_silc_12. Available at: [link](#).

¹⁷⁹ Eurostat database, tour_dem_totot. Available at: [link](#).

¹⁸⁰ The recent conflict in Ukraine may constitute one such shock, having caused disruptions to the European economy. However, an analysis of its effect cannot be carried out in this context because of the lack of data on participation in tourism following 2021. Furthermore, any impact of the conflict will probably be masked by the surge in participation in tourism that is expected for the 2022 data, justified by the post-pandemic termination of all travel restrictions.

The information collected on past trends in participation in tourism of the population aged 15 to 64, and survey data on persons with disabilities in the same age group¹⁸¹ can be combined to estimate future trends in participation in tourism under different scenarios. To this end, Figure 9 plots projections of the participation in tourism for the general population and the population of persons with disabilities in the years from 2022 to 2030. For the general population, the participation in tourism in 2022 is assumed to be at the same level as 2019, having returned to its pre-pandemic trend. It is then expected to grow linearly at the same average annual growth rate which occurred in the years from 2012 to 2019.¹⁸² For persons with disabilities, however, several scenarios are plotted. In the basic scenario, the travel gap estimated via triangulation of the survey data on this group and Eurostat information on the general population is applied to the general participation in tourism, thus obtaining the dark blue line in Figure 9. This is the basic scenario because it assumes that, in relative terms, nothing changes between persons with disability and the general population in terms of participation in tourism. The main takeaway is that, **in the future, if persons with disabilities follow the same patterns as the general population, their participation in tourism will increase. The disparity with the general population will, however, continue as long as key challenges to their participation in tourism are not removed, causing the problem of the gap in participation in tourism to persist in the future.**

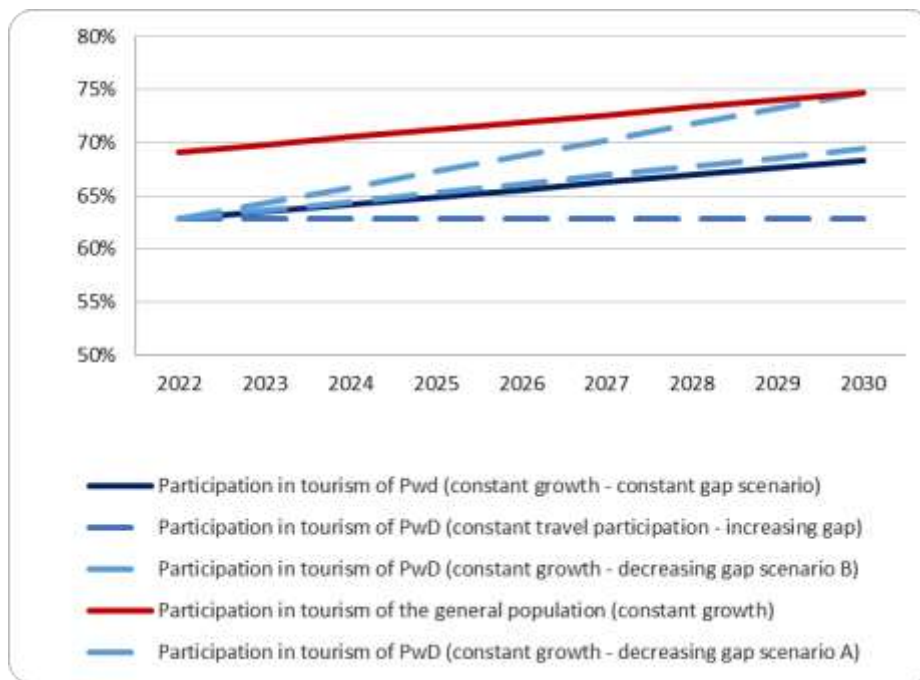
As the future may also involve divergence from the current situation, Figure 9 also presents alternative scenarios. The dashed line at the bottom represents the participation in tourism of persons with disabilities in case their tourism habits do not grow in parallel with those of the general population. This is the most pessimistic scenario, in which, among growing tourism in the general population, the number of persons with disability travelling stays the same. In such a case, the travel gap would increase in the future, thus worsening the problem in relative terms with respect to the general population. The two dashed lines above the solid line, on the other hand, draw from different scenarios in DG GROW's study on accessible tourism, where respondents were asked questions about their participation in tourism under scenarios of "minimum" and "moderate" improvements in accessibility. In the Study, both scenarios entail a reduction in the travel gap with the general population. In the scenarios presented in Figure 9, this reduction is assumed to be diluted in time, as policy and societal changes leading to such improvements would require time and would likely be staggered across countries. In the first, slightly optimistic scenario, the reduction in the gap is very small, leading to around 70% of persons with disabilities aged 15 to 64 travelling by 2030, still lagging behind the general population by a similar proportion than in 2019. In the second, more optimistic scenario of moderate improvements, the reduction is significant and could bring forward a removal of the travel gap (with almost 75% of both the general population and persons with disabilities participating in tourism by 2030). While the two scenarios are encouraging, this strong reduction should be partially attributed to response bias in the survey data¹⁸³ and, most importantly, it is unlikely to happen without major policy interventions aimed at removing obstacles in terms of physical and financial accessibility for persons with disabilities.

¹⁸¹ Economic Impact and Travel Patterns of Accessible Tourism in Europe - Full Report, 08/03/2015. Directorate-General for Enterprise and Industry, now known as Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs (DG GROW), European Commission. Available at: [link](#).

¹⁸² Eurostat database, tour_dem_toage. Available at: [link](#). The time range chosen (from 2012 to 2019) is the one for which data are available.

¹⁸³ Respondents were asked a hypothetical question about their future participation in tourism in different scenarios. Even though responses reflect a need for improvement in the accessibility of tourism, they may not necessarily reflect reality.

Figure 9 – Scenarios of future changes in participation in tourism for persons with disabilities



Source: Author's own elaboration based on desk research

To conclude, **overall uncertainty with respect to the recognition of preferential conditions and of the EU parking Card for persons with disabilities travelling is likely to persist for most Member States.** Furthermore, **the share of persons affected by the problem may grow due to population ageing,** leading to an increase in the incidence of disability among the population. At the same time, disparity in the possibility of travelling and uncertainty when undertaking tourist trips will continue, as the participation in tourism in the general population rises while a gap with the population of persons with disability persists.

4 Why should the EU act?

4.1 The legal basis

The TFEU provides for a multiple legal basis for an EU intervention towards facilitating the free movement of persons with disabilities in the EU.

Firstly, **Article 21(1)** (Part Two of the TFEU on non-discrimination and citizenship of the Union) establishes the principle of freedom of movement and states that “[e]very citizen of the Union shall have the right to move and reside freely within the territory of the Member States, subject to the limitations and conditions laid down in the Treaties and by the measures adopted to give them effect”.

Moreover, the following articles are also relevant to the legal basis for an EU intervention towards facilitating the free movement of persons with disabilities in the EU:

- **Articles 53-62** TFEU concern services provided in the internal market – as an EU intervention towards facilitating the free movement of persons with disabilities in the EU will allow them to **benefit from preferential conditions when accessing services**, (for or without remuneration) when travelling to or visiting other Member States;
- **Article 91** provides for common rules applicable to international transport to or from the territory of a Member State or passing across the territory of one or more Member States. As the EU parking card was based on a transport legal basis¹⁸⁴, an intervention towards facilitating the free movement of persons with disabilities in the EU will provide for preferential conditions related to transport and when accessing **parking facilities**.

4.2 Subsidiarity: Necessity and added value of EU action

The problems identified in section 3.1 are shared by many Member States across the EU. Mutual recognition of disability status when accessing preferential conditions for using certain services has been facilitated through the voluntary adoption of the pilot EDC. Yet, only eight Member States participated in the pilot project. Moreover, evidence from the pilot project shows that sometimes the EDC is not even accepted among the eight Member States that joined the initiative.¹⁸⁵ Moreover, the evidence from SOLVIT platform and public consultation (see section 3.3) shows that limited acceptance of national disability cards and EU parking cards is widespread across the EU. Also, the common EU model of the EU parking card is not up-to-date, and it does not include features to prevent new and current challenges related to the risk of fraud and forgery.

In the absence of EU-level action, there is a risk that no national initiative takes place. Indeed, since the end of the pilot project, only Croatia decided to introduce voluntarily the EDC. Also, national initiatives resulting in increasing divergences in terms of design and format of national parking cards are likely to further increase over the years. While these national initiatives could bring certain benefits to the persons with disabilities, companies and public authorities, they would at the same time create or increase fragmentation and the costs.

The necessity of EU action is directly linked to the cross-border nature of travels as well as to the need to ensure equal treatment of persons with disabilities in their access to preferential conditions offered across the Member States, including for parking. Indeed, the existence of divergent national approaches/frameworks could result in an unbalanced level of rights, an unequal protection for EU citizens/workers across the EU. As such, should the EU not intervene,

¹⁸⁴ 98/376/EC, the Council Recommendation was based on Article 75 TEC, now Article 95(1) TFEU.

¹⁸⁵ European Commission, Directorate-General for Employment, Social Affairs and Inclusion, Chiattelli, C., Abbasciano, C., Schizzerotto, A., et al., (2021), Study assessing the implementation of the pilot action on the EU Disability Card and associated benefits: final report. Available at: [link](#).

current challenges in terms of limited acceptance of national disability cards and EU parking cards across internal EU borders would persist along with different treatments of persons with disabilities across the Member States, with adverse effects on the exercise of their free movement rights enshrined in the TFEU (Art.21).

The need for the action at the EU level is stressed by both the European Parliament (EP) and the European Economic and Social Committee (EESC). Similar views are shared by persons with disabilities, NCAs, national and EU CSOs consulted during the study, claiming that EU action would facilitate mutual recognition of disability status in the EU and improve the implementation of the EU parking card.¹⁸⁶ Also, respondents to the public consultation pointed out that the EU action would facilitate mutual recognition of disability status in the EU. Importantly this view has been largely shared from all categories of stakeholders consulted through the public consultation and namely, 95% of EU citizens, a huge majority of CSOs (66 out of 71) and public authorities (27 of 33); 705 respondents were persons with disabilities. Similarly, they agreed on the need of EU action to improve the functioning of the EU parking card. Particularly, this has been pointed out by 84% of citizens, 59 of 71 NGOs, 26 of 33 public authorities, 16 of 26 companies/businesses/business associations, 19 of 23 academia/research institutions, 18 non-EU citizens and 4 of 4 trade unions, and 639 of 769 Persons with Disabilities across all categories. Finally, EU action could create added value by facilitating the mutual recognition of disability status in the EU, thus enhancing the free of movement of persons with disabilities, as well as their equal treatment when accessing services across the Member States. The implementation of the pilot EDC confirmed that, in the eight Member States participating in the project, the EU action has enabled mutual recognition of disability status that would not have been achieved by Member States acting alone.¹⁸⁷ However, the pilot EDC was voluntary, therefore, the divergences similar to the EU parking card could also develop over time. Also, by acting at EU level there is a possibility to build on Member States' good practices used to improve protection and security of cards, integration of technological developments in the cards and to create a momentum for Member States to advance together towards better outcomes.

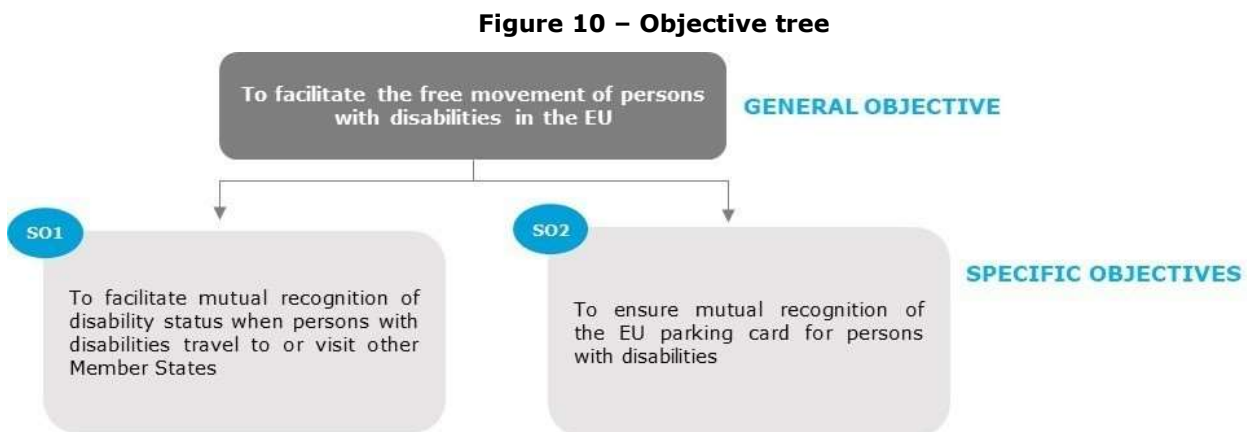
¹⁸⁶ Survey targeted at Persons with Disabilities Q4.1; Survey targeted at NCAs Q4.1; Survey targeted at other public authorities Q4.1; Survey targeted at EU-level CSOs Q4.1 (See Annex VII).

¹⁸⁷ European Commission, Directorate-General for Employment, Social Affairs and Inclusion, Chiattelli, C., Abbasciano, C., Schizzerotto, A., et al., (2021), Study assessing the implementation of the pilot action on the EU Disability Card and associated benefits: final report. Available at: [link](#).

5 Policy objectives

5.1 General and specific objectives

Figure 10 presents the general and specific objectives of a possible EU initiative. The general objective refers to the treaty-based goals whereas the specific objectives are defined in connection with the problems and drivers identified as part of this study (see section 3.1 and 0).



Source: Author's own elaboration

Both specific objectives are closely linked as they aim at tackling problems related to the lack of mutual recognition of disability status in the EU, which reflects in the limited acceptance of national disability cards and certificates across the Member States, including the EU parking card. In turn, such challenges may deprive persons with disabilities of important facilitations in the exercise of their free movement rights. Indeed, persons with disabilities are unsure regarding whether, and what type of, preferential conditions in access to services, including parking rights, will be available to them across the borders, thus creating difficulties for them in travelling abroad. Hence, the future EU intervention should contribute towards mutual recognition of disability status in the EU for the purpose of access to preferential conditions for using certain services when persons with disabilities travel or visit other Member States.

The policy options presented in section 6 intend to achieve both general and specific objectives and to tackle the problems identified in section 3.

5.2 Consistency with other EU policies and initiatives

This section presents findings of an analysis of the consistency between the policy objectives underlying the initiative, i.e. to facilitate mutual recognition of disability status of persons with disabilities travelling to or visiting other Member States (SO1) and to ensure mutual recognition of the EU parking card for persons with disabilities and avoid its fraud and forgery (SO2), with relevant EU policies and initiatives.

EU intervention to achieve both these objectives is fully consistent with the following binding and non-binding initiatives relevant to the EU principle of freedom of movement:

- **Regulation 2018/1724 establishing a single digital gateway to provide access to information, to procedures and to assistance and problem-solving services**

contribute to facilitate free movement for persons with disabilities,¹⁸⁸ by providing access for persons with disabilities to information related to their rights under Union law as well as to applicable national rules and procedures which they need to comply with when they travel across the EU.

- **Council Decision (2010/48/EC) concerning the conclusion, by the European Community, of the United Nations Convention on the Rights of Persons with Disabilities,**¹⁸⁹ which ratifies the UNCRPD. The latter aims at promoting, protecting and ensuring the full and equal enjoyment of all human rights and fundamental freedoms by all persons with disabilities. To this end, the UNCRPD provides for a definition of disability (Article 1), lays down the principles of non-discrimination and liberty of movement (Articles 3 and 18), recognises that appropriate measures must be taken to ensure that persons with disabilities, in particular girls and women, can enjoy real access to the physical environment, transport facilities, information and communications, including information and communication technologies (ICT), and to other facilities and services that are open to, or provided for, the public, in both rural and urban areas (Article 9), sets standards to ensure the independent living of persons with disabilities and their inclusion in the community (Article 19), as well as with regards to their personal mobility (Article 20);
- **Directive 2006/123/EC on services in the internal market,**¹⁹⁰ which aims at removing barriers to the free movement of services between Member States so as to guarantee services' providers and recipients the legal certainty necessary for exercising the practice of the freedom to provide and receive services. In particular, consistency is found with Article 16 of the Directive, which prohibits Member States to introduce conditions for accessing and using a service that are discriminatory on the grounds of nationality, and Article 20, which requires the Member States to ensure that the general conditions for accessing services do are not discriminatory based on the nationality or place of residence of the recipient. In light of the consistency between the policy objectives and Directive 2006/123/EC, the latter would not require to be changed/updated if additional EU action is taken;
- **Directive 2004/38/EC on the right of citizens of the Union and their family members to move and reside freely within the territory of the Member States ("Free movement Directive"),**¹⁹¹ which lays down the conditions governing the exercise of the right of free movement and residence within the EU;
- **European Parliament resolution of 13 December 2022 towards equal rights for persons with disabilities,**¹⁹² which urges the Commission to accelerate its work to ensuring the recognition of disability status of persons with disabilities moving across the EU as well as to securing their freedom of movement. Moreover, the Resolution welcomes an EU legislative initiative towards the introduction of an instrument that favour the mutual recognition of disability status across Member States.
- **European Parliament resolution of 7 October 2021 on the protection of persons with disabilities through petitions: lessons learnt,**¹⁹³ which calls on the Commission and the Member States to establish a common definition of disability and to ensure mutual recognition of disability status across the Member States, so as to ensure the free movement of persons with disabilities and the proper exercise and recognition of their EU citizenship rights. To this end, the Parliament welcomes the Commission's plan to present a proposal for the establishment of an EDC to be recognised in all Member States.

¹⁸⁸ European Parliament and the Council (2018), Regulation establishing a single digital gateway to provide access to information, to procedures and to assistance and problem-solving services and amending Regulation (EU) No 1024/2012 [link](#).

¹⁸⁹ Council Decision (2010/48/EC) concerning the conclusion, by the European Community, of the United Nations Convention on the Rights of Persons with Disabilities. Available at: [link](#).

¹⁹⁰ European Parliament and Council, Directive 2006/123/EC on services in the internal market. Available at: [link](#).

¹⁹¹ European Parliament and Council, Directive 2004/38/EC on the right of citizens of the Union and their family members to move and reside freely within the territory of the Member States amending Regulation (EEC) No 1612/68 and repealing Directives 64/221/EEC, 68/360/EEC, 72/194/EEC, 73/148/EEC, 75/34/EEC, 75/35/EEC, 90/364/EEC, 90/365/EEC and 93/96/EEC Directive. Available at: [link](#).

¹⁹² European Parliament (2022), Resolution of 13 December 2022 towards equal rights for persons with disabilities and Council (2022/2026(INI)). Towards equal rights for persons with disabilities. Available at: [link](#).

¹⁹³ European Parliament (2021) Resolution on the protection of persons with disabilities through petitions: lessons learnt (P9_TA (2021)0414). Available at: [link](#).

- **European Parliament resolution of 18 June 2020 on the European Disability Strategy post-2020**,¹⁹⁴ which calls on the Commission to promote the freedom of movement for persons with disabilities and to develop EU actions to ensuring that all persons with disabilities are able to enjoy the freedom of movement on an equal basis with others. To this end, the Resolution calls on the Commission to create mechanisms to coordinate the portability and adaptability of benefits and services for persons with disabilities between the Member States and to expand the pilot project of the EDC to all Member States, beyond culture, leisure, sport and transport, as well as to ensuring that the EU Parking Card for persons with disabilities is fully observed in all Member States.
- **Commission Communication 'Union of Equality: Strategy for the Rights of Persons with Disabilities 2021-2030'**,¹⁹⁵ which supports the Commission's proposal for the establishment of an EDC by the end of 2023.

Furthermore, ensuring mutual recognition of disability status (SO1) and the EU parking card (SO2) contributes towards the objectives of social inclusion, equality and non-discrimination of persons with disabilities provided for by the following measures:

- **Directive (EU) 2022/362 regarding the charging of vehicles for the use of certain infrastructures**,¹⁹⁶ which allows the Member States to exempt vehicles of persons with disabilities from the obligation to pay a toll or user charge so as to grant them the possibility to use roads subject to road charging without an additional administrative burden (Recital 16). Moreover, the Directive establishes that Member States may provide for reduced tolls or user charges as well as exemptions from the obligation to pay tolls or user charges for or any vehicle used or owned by persons with disabilities (Article 1(3)).
- **Charter of Fundamental Rights of the European Union (EUCFR)**,¹⁹⁷ which provides for the rights applicable to EU citizens, including persons with disabilities, such as the rights to equality before the law (Article 20), non-discrimination (Article 21), and integration of persons with disabilities (Article 26).
- **Commission communication 'The European Pillar of Social Rights Action Plan'**,¹⁹⁸ which aims at ensuring equal opportunities to all EU citizens (Pillar 3), including persons with disabilities, and the inclusion of persons with disabilities (Pillar 17).
- **Sustainable Development Goals (SDGs)**,¹⁹⁹ which include goals directly relevant to ensuring that persons with disabilities have equal opportunities to others, i.e. SDG 8 (to promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all) and its target 8.9 (to devise and implement policies to promote sustainable tourism that creates jobs and promotes local culture and products); SDG 10 (to reduce inequality within and among countries) and its target 10.2 (to empower and promote the social, economic and political inclusion of all, irrespective of age, sex, disability, race, ethnicity, origin, religion or economic or other status) and 10.3 (to ensure equal opportunity and reduce inequalities of outcome, including by eliminating discriminatory laws, policies and practices and promoting appropriate legislation, policies and action in this regard); SDG 11 (to make cities and human settlements inclusive, safe, resilient and sustainable) and its target 11.2 (to provide access to safe, affordable, accessible and sustainable transport systems for all, improving road safety, notably by expanding public transport, with special attention to the needs of those in vulnerable situations, women, children, persons with disabilities and older persons) as well as 11.7 (to provide universal access to safe, inclusive and accessible, green and public spaces, in particular for women and children, older persons and persons with disabilities); and lastly, SDG 16 (to promote

¹⁹⁴ European Parliament (2019), Resolution on the European Disability Strategy post-2020 (2019/2975(RSP)). Available at: [link](#).

¹⁹⁵ European Commission (2021), Union of Equality: Strategy for the Rights of Persons with Disabilities 2021-2030. Available at: [link](#).

¹⁹⁶ European Parliament and Council, Directive (EU) 2022/362 amending Directives 1999/62/EC, 1999/37/EC and (EU) 2019/520, as regards the charging of vehicles for the use of certain infrastructures. Available at: [link](#).

¹⁹⁷ Charter of Fundamental Rights of The European Union (2000/C 364/01). Available at: [link](#).

¹⁹⁸ Commission communication (2021), The European Pillar of Social Rights Action Plan (COM(2021)0102)). Available at: [link](#).

¹⁹⁹ United Nations (UN) (2015), Transforming our world: the 2030 Agenda for Sustainable Development. Available at: [link](#).

peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels).

Finally, since the objectives of a future EU intervention aim at ensuring that all EU citizens with disabilities have access to the same preferential conditions as residents when using certain services across the Member States, it would complement the **European Accessibility Act**,²⁰⁰ which aims to improve the functioning of the internal market by approximating accessibility requirements for certain products and services. In particular, one of the purposes of the Act is to expand the accessibility of products and services for the benefit of persons with disabilities. To this end, it requires the elimination of barriers to the free movement of certain products and services, caused by divergent accessibility requirements in place across the Member States.²⁰¹

²⁰⁰ European Parliament and Council, Directive (EU) 2019/882 on the accessibility requirements for products and services. Available at: [link](#).

²⁰¹ The list of services in scope of the Directive is provided in Article 2 and includes private and public transports.

6 Policy options

6.1 Introduction

In order to address the identified challenges (see the problem assessment in Chapter 3), the following policy options have been elaborated:

- The baseline scenario;
- Policy options aimed at facilitating mutual recognition of disability status in the EU;
- Policy options aimed at ensuring mutual recognition of national parking cards for persons with disabilities.

As a first step, a **long list of options** was elaborated.²⁰² Taking the specific objectives and drivers as a starting point, alternative options were identified based on the data collected in the framework of this study, including existing sources and suggestions by stakeholders, as well as proposals from the study team.

As a next step, a **preliminary screening** of the options included in the long list was performed, reviewing each option regarding its (potential) feasibility and effectiveness. Options for which a lack of feasibility was found, or which were not considered adequately effective, were discarded for further analysis and inclusion in the policy options (see section 6.5).

The **developed policy options therefore contain the retained legislative and non-legislative elements**, dealing with the problems identified in different ways, while aiming to achieve the policy objectives set out in section 5.1.

Details on the specific legislative and non-legislative policy options are outlined in the next sections. The table below shows the intervention logic, which clearly links the four components (i) problems, (ii) drivers, (iii) objectives and (iv) policy options alternative to the baseline scenario.

Table 11 – Intervention logic linking problems, drivers, specific objectives and policy options

Problems	Drivers	Specific Objectives	Policy options
1. When persons with disabilities travel to or visit other Member States, their disability status is not always recognised there, in particular when accessing preferential conditions including those related to services	A. There is limited acceptance across the EU of national disability cards and certificates of non-residents with disabilities issued by other Member States (equity)	SO1: To facilitate mutual recognition of disability status when persons with disabilities travel to or visit other Member States	A1: Mandatory EDC model in all Member States for travelling and/or visiting purposes – selected sectors. A2: Mandatory EDC model in all Member States for travelling and/or visiting purposes – all internal market service sectors.

²⁰² The list was structured according to each specific policy objectives and the individual drivers to ensure that all objectives, problems and drivers are systematically addressed by the policy options.

Problems	Drivers	Specific Objectives	Policy options
2. When travelling by car in the EU, persons with disabilities face difficulties in using their EU parking card	B. National divergences in the implementation of the national parking cards for persons with disabilities hinder their mutual recognition across the Member States (regulatory failure)	SO2: To ensure mutual recognition of the EU parking card for persons with disabilities	B1: Enhanced/reinforced voluntary EU parking card; B2: Mandatory EU parking card model

Source: Author's own elaboration

6.2 The baseline scenario

The baseline scenario constitutes the benchmark against which other policy options are assessed in the context of this study. It would involve no further policy action on the EDC initiative than action that is already in place or is planned, thus leaving in place two current Cards: the EU parking card based on the 1998 Council recommendation and the EDC adopted in eight Member States with voluntary inclusion of the areas of culture, leisure, sports and transport. Service providers are expected to continue to offer the preferential conditions for persons with disabilities on a voluntary basis, choosing to partake in the EDC's initiative. In this context, the situation would follow the problem evolution described earlier.

Table 12 – The baseline scenario

Elements of the option
Specific Objective 1: To facilitate mutual recognition of disability status when persons with disabilities travel to or visit other Member States
Driver A: There is limited acceptance across the EU of national disability cards and certificates of non-residents with disabilities issued by other Member States (equity failure)
<ul style="list-style-type: none"> The baseline scenario would involve no major policy change in the next years that would address the lack of mutual recognition of disability status for persons with disabilities travelling to or visiting other Member States. The establishment of a common European Disability Card scheme for Member States adhering to the initiative has been shown to produce some positive effects in terms of recognition of preferential conditions. These, however, would mainly be limited to the Member States joining the initiative and to the sectors whose service providers are participating. In case additional Member States were to join the EDC initiative in the future, this would lead to enhanced recognition of preferential conditions for persons with disabilities across the EU. This increased participation may be triggered by shifts in policy priorities of the respective governments following national elections, or by the virtuous example set by Member States participating in the Pilot project. In the short term, however, a major increase in participation appears still unlikely, as voluntary participation of Member States remains limited to those who joined the Pilot EDC initiative. Without additional interventions, it is unlikely that this will change over the medium or long term.
Specific Objective 2: To ensure mutual recognition of the EU parking card for persons with disabilities
Driver B: National divergences in the implementation of the national parking cards for persons with disabilities hinder their mutual recognition across the Member States (regulatory failure)
<ul style="list-style-type: none"> In the baseline scenario, the EU parking card based on the 1998 Council recommendation would remain in place without major changes. Regarding the use of the EU parking card, the differences in its layout, design and management modes across the Member States will continue to impair its mutual recognition, with no significant improvement to be expected in the coming years.

Source: Authors' own elaboration

6.3 Policy options aimed at facilitating mutual recognition of disability status in the EU in relation to access to services when visiting another Member State

Table 13 presents the elements of policy options aimed at facilitating mutual recognition of disability status in the EU in relation to access to services when visiting another Member State.

Table 13 – Policy options aimed at addressing Driver A: There is limited acceptance across the EU of national disability cards and certificates of non-residents with disabilities issued by other Member States (equity failure)

Options	Elements of the option
<p>A1: Mandatory EDC model in all Member States for travelling and/or visiting purposes – selected sectors</p>	<p>The EU legislative initiative shall include minimum common rules on:</p> <ul style="list-style-type: none"> • Eligibility: Persons eligible to receive the EDC shall include all EU citizens with recognised disability status. Member States retain the power to determine disability status in accordance with assessment criteria and procedures enshrined in their national provisions of law. The EDC would not replace the national disability cards and certificates. • Scope: The EDC shall apply to the culture, leisure, sport and transport sectors following the positive results of the pilot project. Moreover, the EDC shall also provide that preferential conditions offered to personal assistants of residents with disabilities are, in accordance with national rules and practices, extended to personal assistants and/or accompanying persons of EDC holders when travelling and/or visiting across EU. • Format: The EDC shall have an EU common model both in digital and plastic format in order to be used by persons with different types of disabilities. • Security features: The EDC shall include as a minimum (i) a QR code on the front and back of the card, which certifies the holder’s disability assessment; (ii) a hologram associated to a unique identified number to prevent card duplication; (iii) a relief structure in the form of scannable embossed alpha numerical information as Braille printing. <p>The establishment of the EDC shall be flanked by the following non-legislative measures at the EU level:</p> <ul style="list-style-type: none"> • The EDC shall be accompanied by the recommendation to include all the sectors to ensure bigger impact as transport was included only in two pilot countries. • Integrating Your Europe Portal²⁰³ with a section dedicated to the EDC, including information on: (i) the description of the EDC initiative and the related aims, features and benefits; (ii) the hyperlinks to the EDC national websites in the 27 Member States. • Launching an EU-wide awareness-raising campaign to inform all stakeholders (persons with disabilities and their accompanying assistants, service providers, national authorities, general public, etc.) about the EDC. The campaign would imply the production of a video in an accessible language that presents the features and benefits of the EDC. The video could be disseminated through a TV spot in the main national channels. The same video could be uploaded on the EU and national websites as well as on the EU institutional social media channels (e.g. Facebook, LinkedIn, Instagram, Twitter). Additional information and awareness-raising activities may include: (i) communication campaigns (e.g. TV audio/spot advertisements, social media campaigns); (ii) production of

²⁰³ The Commission’s official website “Your Europe Portal” provides practical information for persons looking to live, work and travel across the EU. The portal already includes a section focused on “transport and disability”, which consists of two sub-sections. The first one focuses on the rights of person with disabilities travelling in the EU, while the second sub-section provides information on the use of the EU parking card for person with disabilities. Your Europe Portal available at: [link](#).

Options	Elements of the option
	brochures in multiple languages; (iii) advertisements in key places where the EDC can be used (e.g. public transports, museums, exhibitions, festivals).
<p>A2: Mandatory EDC model in all Member States for travelling and/or visiting purposes – all internal market service sectors</p>	<p>The EU legislative act will provide for the same minimum common rules described above for measures A1, with the following difference:</p> <ul style="list-style-type: none"> • Scope: The EDC shall apply to all services with or without remuneration, provided by private operators or public authorities, including passenger transport services. Hence all preferential conditions that are currently offered by service providers in a Member State to residents with disabilities will be covered. Moreover, the EDC shall provide that also preferential conditions offered to personal assistants of residents with disabilities are, in accordance with national rules and practices, extended to personal assistants and/or accompanying persons of EDC holders when travelling and/or visiting across EU. <p>The establishment of the EDC shall be flanked by the same non-legislative measures at the EU level foreseen for A1.</p>

Source: Authors' own elaboration

6.4 Policy options aimed at facilitating use and legal certainty of the EU parking card for persons with disabilities

Table 14 presents the policy options aimed at ensuring mutual recognition of national parking cards for persons with disabilities, which includes soft and legislative measures.

Table 14 – Policy options aimed at addressing Driver B: National divergences in the implementation of the national parking cards for persons with disabilities hinder their mutual recognition across the Member States (regulatory failure)

Options	Elements of the option
<p>B1: Enhanced/reinforced voluntary EU parking card</p>	<p>The EU parking card would remain voluntary. To improve its functioning, Annex I to the Recommendation would be amended in order to complement the EU model parking card with security features to prevent its fraud and forgery (e.g. QR code, hologram, barcode) and avoid paper versions.</p> <p>Such amendments shall be accompanied by the following flanking measures:</p> <ul style="list-style-type: none"> • Providing the Member States with EU common guidelines concerning the establishment of national databases of cardholders that are accessible to law enforcement authorities in charge of controlling the use of the card at the national level. Thus the Commission would support coordination between Member States. • Establishing an EU level website in all EU languages, maintained by the Commission and to be fed by the national/local issuing authorities, collecting and presenting information on (i) the number of EU parking cards released, (ii) the stock of valid EU parking cards in circulation, (iii) statistics and information on reported cases of fraudulent use of the card. • Providing the Member States with EU common guidelines concerning the provision of accessible and up to date information (e.g. on a website at national or local level) on: (i) where to get and use the EU parking card; (ii) how the EU parking card works; (iii) scope of rights associated with the EU parking card. • The EU portal Your Europe that provides information on how to get and use the EU parking cards would provide links to the national or local websites where information on the rights associated with the parking cards is provided.
<p>B2: Mandatory EU parking card model</p>	<p>The EU parking card would become mandatory and the current Council recommendation would be repealed. The legislative act shall include minimum common rules on specific security features to prevent its fraud and forgery, such as QR code, hologram, barcode, etc. and it would introduce the EU model that would replace existing cards. The Member States shall retain the power to establish the eligibility criteria to receiving the card as well as to determine the parking rights provided for the card at the national level.</p> <p>In addition, the legislative act shall provide for the following minimum requirements:</p> <ul style="list-style-type: none"> • Member States shall establish national databases including, at the minimum, information on the identity of cardholders and whether the card is currently valid. National databases shall be accessible to enforcement authorities in charge of controlling the use of the card at the national level. • Member States shall ensure that up to date information is available and easily accessible for persons with disabilities (e.g. on a website at national or local level) on: (i) where to get and use the EU parking card; (ii) how the EU parking card works; (iii) scope of rights associated with the EU parking card. • The EU portal Your Europe that provides information on how to get and use the EU parking cards would provide links to the national or local websites where information on the rights associated with the parking cards is provided.

6.5 Options discarded at an early stage

The following options addressing the lack of mutual recognition of disability status have been discarded so far:

Discarded option related to the EDC

To introduce an EDC that applies to a list of selected internal market services identified as priority services

The effectiveness of this option would largely depend on the establishment of a monitoring system aimed to track services participating in the initiative as well as to inform persons with disabilities about both participating services and preferential conditions made available to them. However, such a system is expected not to be cost-effective as it would entail a disproportionate burden linked with the regular monitoring of concerned services along with the establishment of a comprehensive database including information on preferential conditions made available to persons with disabilities.

To establish a Recommendation to introducing the EDC on a voluntary basis in all the Member States (i.e. improving the baseline scenario)

The success of this option would largely depend on the willingness of the individual Member States to partake it. Indeed, only in case all Member States would adopt the voluntary EDC, its mutual recognition would be ensured in the EU. However, based on the experience of the pilot EDC, only few Member States voluntarily decided to adopt the EDC. Thus, in the lack of any additional EU coordination and supporting mechanisms, it is unlikely that more Member States would adopt it. Such considerations are even more concrete considering that the Recommendation would not include any new financial support to the Member States as it was the case of the EDC.

Discarded option related to EU parking Card

To introduce minimum common requirements towards harmonising national rules regarding the rights and benefits granted to card holders

Discarded due to lack of proportionality as this option goes beyond what is necessary to achieve SO2. This option may also raise concerns in terms of political feasibility and implementation since the rights and benefits granted by the parking card for persons with disabilities are set at national and most of the time local level.

Common discarded option for the EDC and EU parking card

To establish a system of mutual recognition of disability status by means of an EU legislative act, which provides for a common definition of disability, as well as related common assessment criteria and procedures

Discarded due to lack of proportionality as this option goes beyond what is necessary to achieve SO1 (i.e. ensuring mutual recognition of disability status when persons with disabilities travel to or visit other Member States). Moreover, since the assessment of disability status is performed at the national level according to assessment criteria and related procedures enshrined in national legislation, this option could also raise concerns in terms of political feasibility.

To merge the EU parking card with the new EDC

Discarded due to a lack of practical and technical feasibility. Indeed, the two cards have different eligibility criteria, hence they should be kept as two distinct cards. Also, public authorities, CSOs and service providers consulted during the study pointed out that merging the two cards would limit the possibility of persons with disabilities to use both cards simultaneously. For instance, persons with disabilities that visit a museum would have to leave their card in the car, while also

needing it to purchase tickets with preferential conditions, and hence needing to show the EDC.²⁰⁴

²⁰⁴ Workshop with CSOs held on 22 March 2023; workshop with CSOs held on 23 March 2023, workshop with service providers held on 11 May 2023.

7 What are the impacts of the policy options?

The assessment of each group of policy options is carried out for different types of impact, including economic, social, digital and environmental, impacts on the fundamental rights enshrined in the Charter of Fundamental Rights (CFR) and impacts on competitiveness and SMEs. All criteria and methodology are described in detail in the Annex II and Annex III.

Benefits are evaluated qualitatively and – whenever possible – quantitatively and, in a similar vein, costs are monetised whenever possible and, if monetisation cannot be achieved, they are evaluated qualitatively or in terms of their expected overall magnitude.

It is estimated that measures considered under policy area A would likely have stronger impacts in those Member States that did not join the pilot EU Disability Card (but not limited to them, as Member States which joined the pilot would also strongly benefit from more Member States joining, as the benefits of the card can be considered compounded by the number of MS which have it). While under the policy area B impacts are expected to be stronger in those Member States, which did not implement additional measures to facilitate the recognition of the parking card (e.g. establish a national database of cardholders, adding security features to the card format).

It should be noted that the analyses of impacts are subject to a certain degree of uncertainty, given the general scarcity of data available on travelling of persons with disabilities, the low participation of service providers in the targeted surveys and the high number of assumptions applied.

Firstly, the limited available data on tourism participation and behaviours of persons with disabilities seriously constrains the possibility to provide a comprehensive picture. The only available data on a small subset of key dimensions of interest is given by the DG GROW report on accessible tourism.²⁰⁵ However, the data dates back to 2012 and there are some concerns about its representativeness of the population of persons with disabilities. This data is complemented through the data collections performed during the Study. However, as in the case of the data from the DG GROW report the Study data may not be representative of the population. Secondly, there is limited quantitative evidence on the impacts of the policy options because the lack of data on participation and behaviour, the limited information on the specific monetary and especially non-monetary preferential conditions available to persons with disabilities (nationals or tourism from other MSs), the relevant challenges in estimating the costs of the initiative for national authorities and local providers. Due to the absence of monitoring of costs by activity, there is limited information on what were the costs incurred by the pilot MS during the implementation of the pilot EU Disability Card. Costs for service providers are difficult to assess rigorously due to the low participation of service providers in the targeted survey on costs.

Finally, the evolving nature of the problem coupled with the limited data available makes it hard to assess the dynamics across time, even under the baseline scenario.

7.1 Assessment of the baseline scenario

7.1.1 Social impacts

Under the baseline scenario, the travel gap existing between persons with disabilities and the general population may persist, widen further or reduce. The most pessimistic scenario

²⁰⁵ Economic Impact and Travel Patterns of Accessible Tourism in Europe - Full Report, 08/03/2015. Directorate-General for Enterprise and Industry, now known as Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs (DG GROW), European Commission. Available at: [link](#).

(widening of the travel gap) takes into account the financial conditions of persons with disabilities that could worsen in the light of the energy transition and continued increase in the price of energy without policies aimed at counteracting their regressive effects.²⁰⁶ This could increase the risk that the gap between persons with disabilities and the general population will increase in the next 15-20 years. However, the most likely outcome is that the travel gap would remain constant.²⁰⁷ In this case, at maximum 21 million persons with disabilities may be participating in tourism by 2030.

Persons with disabilities will continue to face difficulties in accessing preferential conditions due to the limited mutual recognition of the national disability cards and certificates. While additional Member States would remain free to join the pilot EU Disability Card, this is unlikely to happen to a wide extent – at least in the short term – given that in the period since the implementation of the pilot no additional Member States has joined the initiative and only one (Croatia) is considering doing so.

Consequently, limited changes in the participation in tourism opportunities of persons with disabilities are most likely. Their engagement in tourism will continue to be less, owing to their facing high uncertainty and disproportionately higher costs relative to the general population when travelling to other Member States, restricting their personal and social development, mobility and level of inclusion. Likewise, the level of uncertainty regarding the recognition of their EU parking card will remain high, especially when travelling to other Member States leading to recurrent parking difficulties.

7.1.2 Economic impacts

Costs for public authorities

The costs of the EDC for public authorities are due to the establishment of the card scheme, its production and distribution, the setup of national websites and the related awareness-raising campaigns. They are assessed based on the pilot EU Disability Card. If other Member States would join the initiative, they are expected to incur similar costs.

At least 190,000 EDC have been issued by 2023. The total implementation costs of the initiative have been estimated at between roughly 95,000 EUR and 530,000 EUR.²⁰⁸ Since most of the costs are fixed one-off costs (such as establishing the national website, awareness-raising campaign.), the cost per Card diminishes as more Cards are being issued, approaching its unit production and delivery costs.

The one-off cost of establishing the national website ranged roughly between 7,500 and 23,000 EUR. Awareness raising campaigns ranged between 20,000 and 70,000 EUR. The wide range of costs was due to differences in the implementation features chosen voluntarily by Member states. Variable costs such as production, delivery and updating of national websites were low. Production and delivery costs ranged between 1.02 and 4.54 EUR per card.²⁰⁹ The cost of updating the website was not always monitored or some Member States did not report any costs. Among those reporting a positive value (Belgium, Finland and Malta; for Slovenia the information was not provided), it ranged from about 1,000 to 4,500 EUR over 2016 – 2018. The cost of updating the website was not always monitored or some Member States did not report any costs.

²⁰⁶ Boyce, J. K. (2018). Carbon pricing: effectiveness and equity. *Ecological Economics*, 150, 52-61; Köppl, A., & Schratzenstaller, M. (2022). Carbon taxation: A review of the empirical literature. *Journal of Economic Surveys*.

²⁰⁷ For details, see section 2.4 How likely is the problem to persist? and section 3.2.1 and 3.5.

²⁰⁸ Excluding IT and EE, which had not started producing and distributing EDCs at the time of the evaluation Study of the EU Disability Card pilot projects. In this section, PPP is used to account for differences in prices across MS.

²⁰⁹ It appears that including a microchip increases unit costs while other features such as holograms or QR codes do not have a large impact on unit costs.

Among those reporting a positive value (Belgium, Finland and Malta; for Slovenia the information was not provided), it ranged from about 1,000 to 4,500 EUR over 2016 – 2018.

It is important to note that only some of the population of persons with disabilities defined by Member States as eligible for the card will actually apply, i.e., those persons who intend to travel to other Member States. Costs for public authorities therefore cannot be extrapolated from the basis of the entire population of persons assessed by a Member States as having a disability; they will in practice be much lower.

Table 15 – Implementation costs and cards issues in the pilot EU Disability Card over the period 2016-2018

MS	N. Cards issued	Total Costs (PPP)	Cost per card (PPP)
BE	66,141	302,207.32	4.57
CY	2,110	94,896.55	44.97
FI	5,157	236,682.54	45.9
MT	8,157	139,813.38	17.14
RO	14,111	241,393.72	17.11
SI	7,589	535,737.39	70.59

Source: Chiattelli, C., Abbasciano, C., Schizzerotto, A., et al., (2021), Study assessing the implementation of the pilot action on the EU Disability Card and associated benefits.

For the EU parking Card, under the baseline, the costs of updating the security formats and features of national parking cards would mainly consist of the redesign of the cards and the printing and distribution of the new format. Some MS have already added security features to the standard EU parking card mode.²¹⁰ Therefore, it can be expected that more MS will do so to fight fraud and forgery. The total costs will depend on the features added and the number of MS implementing changes and cannot be quantified ex-ante.

Public authorities may have to incur additional costs in order to collect information and train staff on the different formats of the parking cards in place in other MS, even though such costs can be expected to be minor but recurrent.

Costs for persons with disabilities

Costs for persons with disabilities from not fully enjoying cost savings granted by the preferential conditions when travelling abroad are estimated to range from roughly EUR 7 to 30 per day for a 4-day trip if travelling alone, or from EUR 20 to 60 per day if travelling with a personal assistant. Over a two-month period, these costs are estimated to be between EUR 2 to 7 per day. In total, depending on the country, personal assistant, and the length of the trip, these cost range between 30 to 140 EUR per short-term trip, and 100 to 400 EUR per medium-term trip.²¹¹ These are *de facto* foregone benefits for persons with disabilities. It is expected that almost half of persons with disabilities travelling abroad experienced at least one situation where they

²¹⁰ For instance, 10 Member States have already included holograms on their national parking cards to make forgery harder, while 3 Member States also include a QR code (and 3 different Member States use a barcode instead) that can be scanned by authorities in charge of enforcing parking rights to check the validity of the card. Please also see section 3.3.2, Table 6.

²¹¹ Assessment is based on realistic travel routes that a person with disability might take when travelling to other Member States. 4-day trip is the standard length of an overnight trip in the EU, discounting one day for international travel. For details, see Annex III.

haven't benefitted from preferential conditions.²¹² These costs do not include foregone non-monetary benefits, that cannot be easily quantified.

At the same time, EU parking card holders may also incur fines in case their card is not recognised in a (destination) MS. The cost of parking fines varies depending on the MS and can be substantial.²¹³ Due to uncertainty in the recognition of the EU parking card, cardholders may opt for the purchase of parking spaces not reserved for them when travelling to other MS. The costs of parking in off-street structures were estimated at around EUR 1,100 per parking space, per year in 2013.²¹⁴ The average cost of parking spots for the general public use was estimated at EUR 800 per space, per year. Adjusted per inflation and per day (instead of per year), this cost is estimated to be roughly 4 euro per day, which is certainly a lower bound as shorter periods tend to be more expensive. Other estimates calculating the average price of parking in 32 European cities have put the number at about EUR 3 per hour.²¹⁵

Costs for service providers

Service providers from non-pilot MS offering preferential conditions to persons with disabilities from other MS would continue to incur the costs associated with the difficulties in verifying the proof of disability given the differences in national disability cards or certificates and their lack of forgery and fraud control features. These costs are not quantifiable and rather involve time delays and extra burden costs.

The service providers who joined the pilot EU Disability Card initiative will continue to benefit from the easy recognition of cardholders from the participating MS but will still face such costs for what concerns persons with disabilities from the other MS. When offering preferential conditions to persons with disabilities from other MS, they are likely to have direct financial costs. However, this impact is not expected to be significant, given that customers with disabilities from other EU MS appear to make up about 1% of the total client base and majority of the respondents reported low costs (below EUR 30 per customer).²¹⁶

Reduced earnings in the market for accessible tourism

The limited participation in tourism of persons with disabilities would prevent the full development of the market for accessible tourism the latter being an important component of the tourism industry. The average daily spending of persons with disabilities aged 15 to 64 and undertaking overnight trips in the EU was estimated at EUR 102 in 2012.²¹⁷ The total direct economic contribution of accessible tourism at the EU level was estimated at 62 billion EUR, with an indirect multiplier of 1.84. This indirect impact includes the jobs created by the tourism industry by the travel of persons with disability (around 1.6m persons employed across the EU) and gains for secondary markets related to the tourism industry. Under the baseline scenario, the sector will fall short of reaching its full potential. Considering a constant travel gap between persons with disability and the general population of at least 6%, the economic loss due to the

²¹² In the Public Consultation, 429 out of 757 (56%) persons with recognised disability answered that they have never been denied access to preferential conditions when travelling to other MS.

²¹³ Fine range between EUR 60 and 300 in Spain, EUR 40 and 80 in Greece, EUR 30 and 250 in Portugal and EUR 36 and 144 in Italy. In Germany, the violation of parking rules can result in fines ranging from EUR 35 to EUR 110 (estimated by a large provider of car rental services).

²¹⁴ A comprehensive study carried out in 2013 for members of the European Parking Association. Link, full title Scope of Parking in Europe. Data Collection by the European Parking Association, 2013. Available at: [link](#).

²¹⁵ Euronews (2016), The cost of parking across Europe – a Euronews investigation. Available at: [link](#).

²¹⁶ According to the survey targeted at costs for service providers.

²¹⁷ Economic Impact and Travel Patterns of Accessible Tourism in Europe - Full Report, 08/03/2015. Directorate-General for Enterprise and Industry, now known as Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs (DG GROW), European Commission. Available at: [link](#).

reduced travel of persons with disabilities can be estimated at roughly 3.72 billion EUR in the whole EU in 2012 (4.5 billion EUR in 2023).

7.1.3 Digital impacts

The recent technological progress can be expected to continue, bringing about enhanced digitalisation for the stakeholders such as public authorities, service providers and persons with disabilities.

While public authorities and citizens would likely benefit from EU funds²¹⁸ support, nevertheless some issues linked to limited digitalisation of national administrations may persist under the baseline scenario, at least in the short-term. Indeed, not all Member States have a digital registry of persons with recognised disabilities and not all competent authorities make adequate use of digital tools. Still, public authorities at the national or local level are moving to adopt such databases and improve enforcement of parking rights including for cardholders²¹⁹.

At wide EU and national level, digital platforms provide limited information on international initiatives on disability, EU policy on the topic and the rights of citizens with disabilities in the EU. In the absence of action to collect relevant information it is not expected to have a good online overview collection of practical information for persons with disability travelling abroad for short term stays, including about preferential conditions.

7.1.4 Environmental impacts

Small recurrent or additional emissions can be expected as persons with disabilities travel, but less than the general population.²²⁰ These lower emissions, however, would be negligible because of the small share of persons with disabilities choosing not to travel relative to the entire population of persons participating in tourism in the EU.

7.1.5 Fundamental Rights

Under the baseline scenario, certain fundamental rights cannot be ensured to a greater extent for persons with disabilities.

- **Non-discrimination** (Art. 21 EU CFR): finally, under the baseline, some degree of discrimination and inequality in access to services would persist across the EU. Because of the lack of mandated mutual recognition, service providers may face problems in the recognition of preferential conditions to customers with disabilities from other Member States. A significant portion of respondents to the public consultation and the targeted survey for persons with disabilities declared that they were aware of other persons with disabilities who were denied access to preferential conditions in other Member States. This may lead to persons with disabilities deciding not to use those services, leading to unequal outcomes.
- **Integration of persons with disabilities** (Art. 26 EU CFR): under the baseline, the social inclusion and integration of persons with disabilities in European society could not be guaranteed. The lack of mutual recognition of disability status would discourage persons with disabilities from travelling and participating in tourism across the EU, and this would have negative consequences on their full participation in society.
- **Freedom of movement** (Art. 45 EU CFR): formally, persons with disabilities in the EU enjoy free movement rights on an equal basis with the general population. In practice, however, the lack of mutual recognition of disability status across Member States for persons travelling

²¹⁸ The EU's digital strategy for the next years has pledged a EUR 250 billion investment to boost digitalisation from Next Generation EU, and aims at ensuring that 80% of the EU population has basic digital skills by 2030.

²¹⁹ For instance, this is the case for Belgium, where the national competent authority and municipalities are working on a central registration system for car plates, which would also include information on whether car owners are parking card holders, or for the municipalities of Rome and Milan in Italy, where enforcement of parking rights is currently undergoing a digitalisation process which also foresees the implementation of databases of cardholders.

²²⁰ See section 3.5.

or visiting other Member States stays hinders the possibility for this category of stakeholders to fully enjoy the benefits deriving from such rights.²²¹

7.1.6 SMEs and competitiveness

The baseline scenario is expected to have minor negative impacts on competitiveness and SMEs as the market for accessible tourism would be underdeveloped compared to its full potential. This would cause missed earnings for firms working in the sector, the great majority of which are SMEs according to the World Tourism Organisation.²²²

Furthermore, for SMEs offering preferential conditions (17 out of 23 companies responding to the targeted survey on costs for service providers were SMEs) the time cost of verifying different national disability cards or certificates from other Member States, and the foregone earnings due to the smaller number of persons with disabilities travelling as a result of uncertainty, would have a larger impact, in proportion to total turnover.

7.2 Assessment of policy options aimed at facilitating mutual recognition of disability status in the EU in relation to access to services when visiting another Member State (Area A)

7.2.1 Social impacts

The policy options are expected to have moderate positive social impacts, larger in the case of option A2.

Options A1 and A2 would strongly reduce the uncertainty for persons with disabilities, which is together with accessibility issues a driver of the travel gap. Indeed, in the Public Consultation, four sectors that were outside the scope of the option A1 were mentioned by respondents as among the most frequently used: Phones and Internet (55% of respondents), Travel agencies (22.5%), Electricity and Gas (12.7%), Legal assistance (8.9%). Very similarly, the respondents also indicated sectors outside those covered by option A1 as those they would like to see covered by the EDC: Phones and Internet (36.5%), Legal assistance (33.2%), Travel agencies (23.6%), Electricity and Gas (17.9%), Postal Services (13.2%). As a result, the EDC is likely to reduce the travel gap of persons with disabilities. More precisely, it is estimated that, A1 may reduce the 6.3 percentage points travel gap by between 1.32 and 1.94 percentage points. The impact of A2 is expected to be roughly twice as large, ranging between 2.8 and 4.12 percentage points.

Policy options A1 and A2 would increase take-up of cultural services, leisure and sports activities and transport for persons with disabilities. Almost half of participants with recognised disability in the public consultation highlighted that they have been denied access to preferential conditions when travelling to other Member States (307 out of 697).²²³ For instance, some museums explicitly state that national disability cards or certificates "cannot be treated".²²⁴ It is likely that some of them took up activity despite the costs, but not all. In addition, more service providers

²²¹ A majority of participants in the workshops with NCAs and CSOs suggested that persons with disabilities feel disadvantaged in their free movement, compared to citizens without disabilities. This was confirmed by most respondents to the public consultation questionnaire. The problem can become more significant for persons with disabilities who require the presence of a personal assistant: if the lack of recognition of the preferential condition for a personal assistant impede travel, this could be considered as hindering free movement.

²²² World Tourism Organization (UNWTO, Madrid, 2018), European Union Tourism Trends: "EU destinations counted 608 thousand accommodation establishments in 2016, mostly small and medium-sized enterprises (SMEs)". Available at: [link](#).

²²³ See Annex I – section 2.2, results from the public consultation.

²²⁴ See Annex III for the case of a museum in Hungary.

are likely or very likely to offer preferential conditions also to customers with disabilities from other EU Member States if a uniform and reliable EU proof of disability status existed. Services providers consulted mentioned the difficulties in verifying the proof of disability status among the main reasons for not extending the provision of preferential conditions, which they would otherwise provide.²²⁵

An important benefit for person with disabilities would come from saving in the public and private transport sector. Transport is highly valued by persons with disabilities and perceived as crucial by CSOs to ensure mobility of persons with disabilities.²²⁶ Transport was mentioned as the first sector that they would like to see covered by the EDC by 94% of persons with recognised disability in the public consultation.²²⁷

Accompanying measures are assessed qualitatively. They would enhance positive social impacts from the increased knowledge of preferential conditions also in the country of residence resulting from awareness raising campaigns and the websites providing information on the existence of the EDC and of preferential conditions. Increased take-up of services in sectors such as culture can be beneficial for personal well-being, social cohesion and better participation in society²²⁸. The actual magnitude of such impacts would depend on additional factors, such as the level of accessibility of the sectors involved.

7.2.2 Economic impacts

Policy options A1 and A2 would create both benefits (mainly in the form of cost savings) and costs for stakeholders, in particular service providers and national authorities. It would also create cost for public authorities that heavily subsidise the transport sector. However, these costs might be partly compensated by the additional persons travelling accompanying persons with disabilities such as family and friends who will pay the travel themselves.

Impacts on persons with disabilities

Improving access to preferential conditions for persons with disabilities travelling to other Member States would reduce their costs in comparison to baseline situation. Most monetary preferential conditions, such as reduced tariffs and tickets, are in the transport, culture, and leisure sectors. So, both options A1 and A2 are likely to significantly reduce those costs for persons with disabilities. In total, depending on the country, personal assistant, and the length of the trip, these savings range between 30 to 140 EUR per short-term trip, and 100 to 400 EUR per medium-term trip.²²⁹ However, these savings would not occur for all travelling persons with disabilities. As emerged from the Public Consultation, only around 44% of EU citizens with recognised disability (307 out of 697) have ever been denied access to preferential conditions when travelling to other member states. For option A2, benefits for PERSONS WITH DISABILITY would be higher, as they include also other sectors and non-monetary benefits.

Impacts on service providers

Policy options A1 and A2 are likely to lead to benefits, i.e., cost savings for service providers already offering preferential conditions to persons with disabilities from other Member States as they won't have to check diverging national disability cards or certificates anymore. 12 out of 18 service providers, who are in such situation, considered that a tool such as the EDC could simplify

²²⁵ Survey on costs targeted at service providers Q34.

²²⁶ Only 2 MSs in the pilot EU Disability Card included this sector. Chiattelli, C., Abbasciano, C., Schizzerotto, A., et al., (2021), Study assessing the implementation of the pilot action on the EU Disability Card and associated benefits, Table 24, Available at: [link](#).

²²⁷ See Annex I – section 2.2, results from the public consultation.

²²⁸ Anheier, H. K., List, R. A., Kononykhina, O., & Cohen, J. L. (2017). Cultural participation and inclusive societies: A thematic report based on the indicator framework on culture and democracy. Council of Europe.

²²⁹ Assessment is based on realistic travel routes that a person with disability might take when travelling to other Member States. 4-day trip is the standard length of an overnight trip in the EU, discounting one day for international travel. For details, see Annex III.

the process of recognition of disability status to a moderate, high or very high extent.²³⁰ Five service providers who do not yet offer preferential conditions to non-residents would expect a positive or no impact in terms of benefits to costs ratio; none was expecting a negative impact. Most expected at least some benefits in terms of visibility, reputation, quality of services, perception on the importance of accessibility, higher volume of customers from the EU, insights for future developments of services.²³¹

The costs for service providers are not expected to be significant. Even in the most optimistic scenario outlined in section 3.5, where the travel gap of persons with disabilities closes with respect to the general population, the growth in the number of persons with disabilities travelling would not be significant enough to impact the client base of service providers from other Member States, and the range of persons with disability would remain between 1 and 2%. Furthermore, costs for service providers are potentially compensated by an expansion of their client base resulting from increased accessibility of their services, improved visibility and reputation, or from access of additional customers accompanying persons with disabilities, who are not the personal assistant and therefore do not benefit from preferential conditions.²³² The example of the pilot EU Disability Card showed that the majority of service providers experienced benefits (monetary and non-monetary) which, at a minimum, outweighed costs.²³³

A specific assessment of costs of offering preferential conditions to persons with disabilities from other Member States was carried out for the transport sector, which is both the sector that offers the most preferential conditions to persons with disability and is most frequently linked to short-term stays. These calculations are outlined in Annex III. Data on preferential conditions offered in a sample of 10 countries was collected and assessed in terms of direct costs for transport service providers.²³⁴ These estimates rely on the share from the Public Consultation of persons with disabilities 15-65 who have indicated having ever been denied from preferential conditions abroad (46%) and on the share of those who indicated travelling alone (therefore certainly without personal assistant) in the DG Grow report (27%).²³⁵ The direct costs for each Member State of offering preferential conditions in the transport sector to persons with disabilities from other Member States are estimated the costs range between 1.7. to 31.2 million EUR per year, where the range depends on the country in question, its tourist flows, and the extent of preferential conditions currently offered to nationals. When compared to total turnover in the passenger transport sector (excluding air travel), these figures are estimated to range between from 0.01% to 0.31%. The total yearly costs are estimated to range between 116 and 161 million EUR in the whole EU-27, accounting for only 0.05% to 0.08% of (non-air) passenger

²³⁰ Survey on costs targeted at service providers.

²³¹ Survey on costs targeted at service providers Q34 (See Annex VII).

²³² Survey on costs targeted at service providers: 12 out of 25 respondents indicated that customers with disabilities are usually accompanied by at least one paying visitor.

²³³ Chiattelli, C., Abbasciano, C., Schizzerotto, A., et al., (2021), Study assessing the implementation of the pilot action on the EU Disability Card and associated benefits, Figure 23 and Figure 24. Available at: [link](#).

²³⁴ It is important to underline that these costs refer to the direct potential, total burden for transport service providers (including VAT), irrespective of their status (public/private/mixed) and, if public, the level of their financing (local, regional, national). Moreover, it should be noted that these estimates are very sensitive to three parameters: i) the travel propensity of persons with disabilities towards a given Member State, which is unknown, as only an estimate of the EU-average of travel propensity for persons with disability is available; ii) the share of persons with disability who travel with a personal assistant. ; iii) the share of persons with disabilities who currently already benefit from preferential conditions when abroad. This is imprecisely estimated, due to lack of data, and is likely to vary significantly by country and service provider. In the public consultation, around 44% of EU citizens with recognized disability responded ever having been denied access to preferential conditions

²³⁵ There are three reasons to take these estimates as a upper bound of the costs of offering preferential conditions as a result of the EDC in the transport sector: i) the EDC is estimated to close the gap in participation in tourism between Persons with disability and the general population, which is the best case scenario; ii) 46% of PwD are assumed not to benefit at the moment from preferential conditions, which is the maximum value given that these are PwD reporting ever being denied a preferential condition abroad (in any country or sector), iii) 73% of PwD are assumed to travel with a personal assistant, given that in 2012 27% of PwD reported travelling alone. This again is an upper bound considering that not all 73% travelling with somebody are travelling with a personal assistant (but as well other family members, colleagues, friends who could be paying customers).

transport. It should be stated that these costs figures provide a conservative upper bound of the total direct costs for the transport sector, which are likely to be significantly lower both in absolute term and as a percentage of total turnover. Nonetheless, even taking an upper bound, the direct costs appear negligible relative to the overall market size of non-air, passenger transport.

Additional adjustment costs for service providers, linked to the implementation of policy options A1 and A2, may involve small labour costs to be incurred in order to train their staff on recognition. While the majority of respondents to the survey did not foresee, as a result of the introduction of the EDC, a significant change in such costs, about half of them envisage the possibility of a small increase in the cost of training staff for the provision of personalised services.²³⁶ While training staff is mostly a fixed cost, providing personalised service to the clients is rather a variable cost.

Impacts for public authorities

The costs linked to the production and distribution of the EDC for Member States are expected to be the same for policy options A1 and A2. 19 Member States would have to establish an EDC scheme from scratch and incur such costs. An ex-ante evaluation of implementation costs of this kind of initiative is made harder by lack of certainty on the actual implementation steps and the efficiency of public authorities in implementing the policy. In the EU Disability Card pilot project, costs across countries ranged from 1.02 to 4.54 EUR per unit of production and delivery, and 90,000 to 535,000 EUR for the total implementation.²³⁷ The total estimated costs of producing and delivering the Card for the 19 EU MS under both options A1 and A2 are expected to fall within this range, and might be even lower given that the common Card format would reduce design costs.

Also, the production of a digital EDC leads to some cost related to the building of an IT system. This one-off cost is estimated to be 1.67 million EUR with recurring maintenance costs estimated at EUR 249,757 per year.²³⁸

Further adjustment costs would arise from non-legislative accompanying measure for policy options A1 and A2, i.e. the establishment of national EDC websites providing information on the Cards issued and the service providers offering preferential conditions. These costs are not expected to deviate significantly from those incurred by participants in the pilot initiative, where the fixed costs of setting up the websites ranged between 7,000 and 23,000 PPP EUR per Member State. However, they may even be reduced if Member States follow a common website format. The costs of maintenance of the websites were negligible for Member States participating in the pilot, and never exceeded 5,000 EUR per year.

Finally, additional costs would be incurred to run the awareness raising campaigns. The costs per Member State are not expected to deviate significantly from those incurred by participants in the pilot initiative, where they ranged between 21,000 and 70,000 EUR per Member State.

Administrative costs

Policy option A1 do not entail any substantial administrative costs. Indeed, no administrative obligations are entailed by measures included under this option. All EU citizens that already have a disability status recognised according to rules and procedures established in their Member State will be eligible to receive the EDC. Hence, there will be no administrative obligations for Public Authorities as a result of the measures included under this option. Some costs might stem from possible requests for information from EU citizens regarding the scope of application of the EDC. However, such costs shall not be intended as administrative costs specifically, rather as broader compliance costs. As to the businesses, private Service Providers will not face any

²³⁶ Survey on costs targeted at service providers Q39 (See Annex VII).

²³⁷ Chiattelli, C., Abbasciano, C., Schizzerotto, A., et al., (2021), Study assessing the implementation of the pilot action on the EU Disability Card and associated benefits, Section 6.2.3, Table 30. Available at: [link](#). Data on costs in the study on the Pilot action were obtained following desk research and consultation with the DCNOs.

²³⁸ See Annex III - Analytical Methods for further details on calculations of estimated costs of IT system to support the production of a digital EDC.

administrative obligations on top of compliance costs entailed by the EDC. Service Providers might incur in some initial one-off administrative costs in case they spend time to check whether the services they offer fall under the sectors covered by the EDC. Yet, internal market sectors are well codified, and Service Providers do likely know in advance whether their respective business sectors are in the scope of the EDC. Hence, checks and related burdens are expected to be negligible. Finally, citizens will face costs related to the application procedures, which are however part of the broader compliance costs. Same considerations developed for Option A1 will apply to **policy option A2**. Indeed, the broader scope of the EDC under this option will not affect its implementation in terms of additional administrative costs. The extension of the EDC to all internal market services is not linked with any monitoring and reporting obligations for either Public Authorities, or businesses or the citizens. Finally, there will be no uncertainty for the businesses and the citizens regarding to the sectors in scope, as the EDC will cover all internal market services for which preferential conditions are already in place for residents with disabilities.

Wider macroeconomic benefits in the market for accessible tourism

A wider macroeconomic benefit of policy options A1 and A2 would involve an increase in turnover for the accessible tourism market. The mutual recognition of disability status for persons with disabilities travelling to or visiting other Member States would increase their demand for tourism products providing macroeconomic benefit in the market for accessible tourism. More precisely, the impact of policy option A1 in the market for accessible tourism is estimated to range from 1 to 1.5 billion EUR. The impact policy option A2 in the value added in the market for accessible tourism it is estimated to be larger than A1, ranging from 2.1 to 3.1 billion EUR.

7.2.3 Digital impacts

Policy options A1 and A2 would entail similar limited positive digital impacts.

One digital impact of the policy options would entail limited improvements in the digital skills of persons with disabilities as they would be incentivised to use digital tools such as the national and EU websites to obtain information on the rights granted to them by the Card, its eligibility criteria and the preferential conditions offered. This impact would be greater, the better the synergies with the Web Accessibility Directive mandating accessibility of websites of public sector bodies in the EU (the coherence of policy option A2.1 with Directive (EU) 2016/2102 was discussed in the section on Coherence).

A second digital impact would be linked to the minimum common standards to be followed by public authorities in line with the policy option, including the establishment of a national EDC website. The implementation of these standards would entail some improved digitalisation of national public authorities in the field of social policy, compared to the baseline. This would also have beneficial effects on data collection on persons with disabilities, which is insufficient in several Member States. Furthermore, the sharing of good practices on the design of the websites and their accessibility, in the context of implementation of the policy, could bring further improvements.

7.2.4 Environmental impacts

The environmental impacts of the European Disability Card initiative are expected to be small.

Firstly, the negative environmental impact of travel may increase due to an increased number of Persons with Disabilities travelling within the EU but the increase is expected to be minor. Both options might redirect some of the travel from cars to other means of transport, such as public transport, as it would become easier for persons with disabilities to enjoy preferential conditions related to transport abroad. This effect is difficult to quantify but might partly or fully offset the environmental impact of higher overall mobility of persons with disabilities.

Secondly, the production of plastic cards is expected to leave an environmental footprint, but it is considered to be negligible. This impact will vary depending on the final format of the card and its features. Studies estimate the carbon footprint of plastic cards similar to the EDC (such as cards used for public transport and access control schemes) at around 40g of CO₂

equivalent.²³⁹ In this context, assuming a future production of EDCs in a range between 5 and 16 million,²⁴⁰ the overall environmental footprint would be in the range of 200 to 640 tonnes of CO₂ equivalent, comparable to the total yearly of emissions of around 60 EU residents.²⁴¹

In conclusion, both policy options are not expected to have significant impacts on the environment.

7.2.5 Fundamental rights

Policy options A1 and A2 would have strong positive impacts on ensuring certain fundamental rights within the EU.

- **Non-discrimination** (Art. 21 EUCFR): the policy option would contribute to the principles of non-discrimination and equality in access to services. The preferential conditions and the personalised services offered in several sectors to persons with disabilities are an important factor determining their choice to use such services, as they often suffer greater economic uncertainty and has special accessibility requirements. This positive contribution to non-discrimination compared to the baseline would, however, be limited by the scope of option A1, only concerning the sectors of sports, leisure, culture and transport. In the remaining internal market services, the barriers highlighted in this section would persist. The contribution to this fundamental right would be more far-reaching under option A2.
- **Integration of persons with disabilities** (Art. 26 EUCFR): policy options A1 and A2 would be beneficial to ensuring social inclusion and integration of persons with disabilities, as discussed in the section on social impacts.
- **Freedom of movement** (Art. 45 EUCFR): the policy options would facilitate the free movement of persons with disabilities across the EU, by reducing difficulties linked to the lack of mutual recognition of their disability status.

7.2.6 SMEs and competitiveness

Policy options A1 and A2 are not expected to have significant impacts on competitiveness and SMEs. If then, it will be positive.

In the targeted survey for service providers, the only 15 responding SMEs offering preferential conditions to persons with disabilities from the EU believed that the EDC would simplify the process of recognising the disability status of customers with disability from other EU MS, meaning that this category of stakeholders would benefit from the options by reducing the time needed to check for the disability documents presented by their customers.²⁴² Similarly, all respondents, irrespective if SMEs or large companies, believe that extending preferential conditions under the EDC would lead to non-negative overall impact in terms of benefits relative to costs.²⁴³

Furthermore, SMEs may experience some positive returns deriving from the small positive economic impacts of the policy in the field of accessible tourism, as described in the section on economic impacts, given that many SMEs operate in the tourism sector.²⁴⁴

²³⁹ Uwe Trüggemann, Carbon footprint of the Card Industry (TruCert Ltd). Available at: [link](#). By comparison, according to the study, the environmental footprint of an average ID Card with more complex features stands at around 50g of CO₂ equivalent.

²⁴⁰ The estimates are obtained assuming that the population affected by the EDC is equivalent to the number of persons with severe disabilities, whose magnitude has been shown to be a valid proxy for the size of the population with recognised disability status in section 3.2.1. The range is obtained directly assuming a take-up of the Card ranging between 20% and 60% of all persons with severe disabilities in 2021 in the 19 Member States that did not participate in the Pilot project, and should therefore be considered as an upper bound given that – according to the findings of the study evaluating the pilot project – the actual take-up of the Card may be lower.

²⁴¹ Greenhouse gas emission statistics – carbon footprints, Eurostat. Available at: [link](#). According to Eurostat, the average amount of per person CO₂ emissions in the EU was 7.1 tonnes in 2019.

²⁴² Survey on costs targeted at service providers, Q34 (See Annex VII).

²⁴³ Workshop with service providers held on 11 May 2023.

²⁴⁴ World Tourism Organization (UNWTO, Madrid, 2018), European Union Tourism Trends: “EU destinations counted 608 thousand accommodation establishments in 2016, mostly small and medium-sized enterprises (SMEs)”. Available at: [link](#).

7.3 Assessment of Policy options aimed at facilitating use and legal certainty of the EU parking card for persons with disabilities (Area B)

7.3.1 Social impacts

As compared to the baseline scenario, policy options B1 and B2 are expected to have positive social impacts, with the impact of B2 being larger.

Participation in tourism of cardholders is likely to increase as a result of greater certainty regarding the full recognition of their EU parking cards when travelling to different Member States. While B1 is expected to have a small impact impossible to quantify ex-ante given the largely voluntary nature of the policy option, for B2 the estimated impact ranges between 0.27 and 0.4 percentage points. Indeed, the mandatory nature of option B2 is expected to reduce uncertainty for persons with disabilities and hence boost their propensity to travel more. In both cases, enhanced participation in tourism would entail a series of positive social consequences, ranging from greater inclusion through increased take-up of cultural services, to social and personal development.

In terms of total magnitude, social impacts related to increased participation in tourism are likely to be small compared to baseline, as the number of the EU parking card holders with disabilities constitute a small share of the EU population of persons with recognised disabilities.²⁴⁵

7.3.2 Economic impacts

Benefits for persons with disabilities

The respective options would entail benefits for cardholders in the form of cost savings on information and fines. The provision of accessible information on the parking card conditions could reduce time costs for obtaining the information.²⁴⁶ Cost savings would also come from the reduced / avoided fines²⁴⁷ caused by the lack of recognition of national parking cards, and by the lack of knowledge on the rights granted in different Member States.²⁴⁸ These would become cost savings if a more adequate provision of information on parking rights of cardholders travelling to different Member States as a result of the policy options leads to the avoidance of unnecessary fines.

Impacts for public authorities

The policy options would entail benefits/cost savings with respect to the baseline, linked to a reduction in the enforcement cost for public authorities due to the enhanced security features of the EU parking card. These cannot be quantified precisely, as it would mainly involve the time savings linked to homogeneous security features of EU parking cards. Furthermore, the establishment of national databases providing information on the number and identity of residents that are cardholders would be especially beneficial for enforcement authorities.²⁴⁹ The presence of such data storing systems would make enforcement of parking rights easier at the

²⁴⁵ Respondents to the online workshop with CSOS held on 22 March 2023.

²⁴⁶ 17 out of 24 respondents to the targeted survey for persons with disabilities reported that differences in national parking cards increased their costs for obtaining information about the different parking conditions granted.

²⁴⁷ For the cost of fines please see the Section 5.1 and annex II.

²⁴⁸ As reported in Section 2.2.2 around 30 complaints received on the SOLVIT platform on the parking card were about fines received by cardholders who assumed that the rights granted by the EU parking card when travelling to other Member States were the same as those granted in their country of residence. This led to unnecessary costs for persons with disabilities.

²⁴⁹ Respondents in Workshop with CSOs held on 22 March 2023.

national level, facilitating controls on national cardholders. While the two policy options only recommend accessibility of the databases to national authorities within each Member State, it can be expected that some of them would make the database also accessible to other EU Member States, thus leading to additional improvements compared to the baseline.

The main adjustment costs of policy options B1 and B2 would be implementation costs for public authorities to update the card to reflect the revised EU model, and its security formats and features.²⁵⁰ The total costs are expected to be minor for public authorities. The majority of national authorities reported that the adoption of the EU parking card did not entail significant costs for authorities in charge of managing it and issuing it.²⁵¹ The same can be assumed for the update of the card, for which the management system would not change. For option B1, total costs would be reduced given the non-binding nature and the fact that some Member States already updated security features of their national parking cards. As mentioned in chapter 2.3.2., and in the Annex 6, 10 Member States are already using a hologram to prevent forgery of the Card, and in addition, 3 are using a QR code and 3 are using a bar code.

Based on the information collected during the study, an estimate of the costs of printing EU parking cards with additional security features are the following:

- Holograms: the cost ranges between € 0.017 (Belgium) and € 0.25 (Italy)²⁵² per card, depending on the size and the foil used.
- Tag RFID: € 0.30 per card (Italy).²⁵³
- QR code: fixed cost during the initial set-up, no available estimate (Belgium).
- Card with a hologram and a serial number connected to a database: €4.00 (Denmark).

Further adjustment costs would be linked to the establishment of the national database of cardholders, foreseen either by the guidelines of option B1 or the minimum requirements of option B2.²⁵⁴ These costs would be limited to the MS not already in possession of such a database and would only be incurred by the MS choosing to implement the updated Recommendation.

From the evidence collected from Denmark, the cost of setting up and maintaining a database of EU parking card holders are respectively around DKK 3 million (circa EUR 400,000) for the development and around DKK 300,000 (circa EUR 40,000) for maintenance. In Denmark, six people are working with the EU parking card management and reading applications from the citizens and the database is also used to register people with a Danish disabled companion card.

In Belgium and in the municipality of Rome, the costs of establishing and maintaining a database of parking card holders could not be disaggregated but are absorbed in other costs already sustained by public authorities, as such databases are typically used for multiple purposes by the authorities. In Belgium, the data are processed and stored in the management system of the national ministry for persons with disabilities, which is also used to calculate allowances. It is therefore not possible to put a cost price on this as it is not a separate database solely for parking cards, but a complex application that also includes calculations and payment of allowances. In the municipality of Rome, the cost to develop the digital platform to manage the parking cards and the associated car plates (e.g., to check cards' validity and the right to park in reserved spots and to access certain limited traffic areas) is not possible to retrieve as the

²⁵⁰ Such as the acquisition of the equipment necessary to print the new cards, the hardware and software necessary to implement the new security features (for instance, in the case of QR codes as security features, to produce a QR code for each parking card and set up a platform through which these QR codes can be checked, such as the "Handi2Park" app used in Belgium, available at: [link](#)), and the costs of training authorities on the outlook and functioning of the new features.

²⁵¹ Survey targeted at NCAs Q3.11.

²⁵² This information has been collected from the Municipality of Rome.

²⁵³ This information has been collected from the Municipality of Rome.

²⁵⁴ These would include the cost of software necessary for the creation of the database and its operation, the cost of training staff on the functioning of the database, and the cost of staff in charge of technical oversight of its functioning.

municipality uses a unique platform to manage everything that concerns traffic and authorizations, not just the EU parking card for persons with disabilities.

Representatives from the Spanish Ministry of Social Rights consulted during the study²⁵⁵ explained that the Autonomous Communities are responsible for the processing and management of community parking cards, and that although there was an initial initiative to have an official register for cardholders at the central level, it has not been successful and therefore the competence for the EU parking card remains regional or, in some cases, local. For this reason, the data is very scattered and there is no information on the cost of either the security features nor the creation and maintenance of a database of cardholders.

For the national websites providing information on the parking card, costs are not expected to deviate significantly from those incurred in the context of the pilot EDC initiative, which entailed the set-up of websites to provide information on the card (similarly to what would be carried out in the context of option B1, with the parking card). Dividing the costs between fixed set-up costs and annual maintenance costs of updating the websites, the fixed costs ranged between PPP EUR 7,524 and EUR 22,936 per Member State. The annual variable maintenance costs ranged between 0 and EUR 4,652 per year.²⁵⁶ It should be considered that the final total costs resulting from these estimates would be an upper bound, as Member States may decide to incorporate dedicated pages providing information on the EDC in already existing national websites on the rights of persons with disabilities.

Administrative costs

Policy option B1 is not expected to entail any substantial administrative costs. Indeed, the option is entirely voluntary, hence no costs can be attributed to administrative activities performed to comply with new legislative acts. Yet, in the case, Member States would decide to follow-up the Recommendation and establish national databases, the costs for Public Authorities would at maximum be as assessed for B2. Also, No administrative obligations for business and citizens are entailed by the measures included **policy option B2**. Public authorities might incur some reporting costs stemming from the establishment of national cardholder databases. Currently, there are 10 Member States (i.e., AT, BE, CY, DK, IE, LU, LV, MT, PL, PT) with a centralised management model, where a national database may either already be in place or will not require exchange of information. In addition, there are 10 Member States with a decentralised model (i.e., BG, CZ, DE, ES, HR, IT, NL, RO, SE, SK) and 7 Member States (i.e., EE, EL, FI, FR, HU, LT, SI) with a mixed governance model. For these two groups of countries, if a national database is established, sub-national authorities would have to report information to the national authority. Thus, reporting costs would be limited to Member States where such databases are managed at the sub-national level, thus requiring sub-national parking card authorities to regularly report information to the national authority in charge of managing the new national database. Such costs are expected to be negligible as no additional information shall be collected, and the time needed to exchange existing information between authorities within the same country would be almost nil in either of the following scenarios:

- a. Existing databases managed by Public Authorities at different governance levels are interoperable: data will be automatically updated and the overall cost will be zero
- b. Sub-national authorities provide updated information about existing valid cards themselves on a regular basis (e.g. monthly). The time to collect such information is expected to be negligible as such authorities already have this information in their end, hence they just have to share it with the national authority via email.

Wider macroeconomic benefits in the market for accessible tourism

The aggregate economic impacts of policy options B1 and B2 would be mainly linked to the potential increase in travelling patterns of cardholders, which would affect (although with a limited magnitude) the market for accessible tourism. These mechanisms are similar to those already described for the baseline and for policy options A1 and A2, but likely to be significantly

²⁵⁵ Ad-hoc consultation by email to investigate the impacts of the policy options on the EU parking card.

²⁵⁶ As some Member States reported no significant cost of maintenance.

smaller. More precisely, while B1 is expected to have a small impact impossible to quantify ex-ante given the largely voluntary nature of the policy option the impact in terms of value added in the market for accessible tourism range from 0.2 and 0.4 billion EUR for B2.

7.3.3 Digital impacts

Policy options B1 and B2 are expected to have the same small digital impacts. The difference is that for option B1, these impacts would concern only the Member States implementing the necessary measures to comply with the updated Recommendation. For option B2, they would be more far-reaching as they would involve all MS.

Currently, there are 10 Member States (i.e., AT, BE, CY, DK, IE, LU, LV, MT, PL, PT) with a centralised management model, where a national database may either already be in place or will not require exchange of information. In addition, there are 10 Member States with a decentralised model (i.e., BG, CZ, DE, ES, HR, IT, NL, RO, SE, SK) and 7 Member States (i.e., EE, EL, FI, FR, HU, LT, SI) with a mixed governance model. For these two groups of countries, if a national database is established, sub-national authorities would have to report information to the national authority. Thus, reporting costs would be limited to Member States where such databases are managed at the sub-national level, thus requiring sub-national parking card authorities to regularly report information to the national authority in charge of managing the new national database.

Member States establishing national databases of cardholders, accessible to national enforcement authorities, will experience limited improvements in digitalisation and modernisation in the management of their national parking card schemes. For the Member States following the updated Recommendation, the databases have the potential of making the control of parking cards more efficient (as authorities could directly check the registration of the cardholders in the national database). At the same time, the availability of online information on the use and application procedures for the parking card, foreseen by another of the accompanying measures of policy option B1, could encourage use of digital tool by persons with disabilities. For this digital impact to occur, however, accessibility of such digital platforms would have to be ensured.

7.3.4 Environmental impacts

The environmental impacts of policy options B1 and B2 are negative, but likely to be insignificant in magnitude compared to the baseline.

The impact would be linked to increased travel by car of cardholders following greater certainty in the recognition of EU parking cards among Member States. Due to the relatively small numbers of cardholders across the EU, this impact can safely be assumed to be negligible.

A further environmental impact may be linked to the increased production of the EU parking cards to replace those with outdated security features in Member States complying with the updated Recommendation. However, as demonstrated for policy option A2 and considering the lower number of parking cards issued compared to the potential number of EDCs, this impact is likely to be insignificant, as it would be lower than the emissions produced by 60 EU residents on average in a year.

7.3.5 Fundamental rights

Policy options B1 and B2 would have strong positive impacts on ensuring certain fundamental rights within the EU.

- **Integration of persons with disabilities** (Art. 26 EUCFR): further impacts on fundamental rights are also linked to increased travel propensity of cardholders and to their participation in tourism and subsequent take-up of cultural activities would positively contribute to social inclusion and integration to the society of persons with disabilities as compared to the baseline.

- **Freedom of movement** (Art. 45 EUCFR): the policy options entail to a greater extent the free movement of persons with disabilities, as a result of greater certainty in the recognition of EU parking cards across the MS.²⁵⁷

7.3.6 SMEs and competitiveness

The policy options B1 and B2 are not expected to have any significant impact on competitiveness and SMEs. As discussed in Section 7.2.1 on social impacts and Section 7.2.2 on economic impacts of this set of policy options, the increased participation of persons with disabilities in tourism resulting from more certainty regarding the recognition of EU parking cards in other MS would benefit the accessible tourism market. Tourism is a sector where SMEs are prevalent. The impact, however, is likely to be very small in magnitude due to the relatively small number of cardholders compared to the number of persons with disabilities and the total EU population travelling.

²⁵⁷ Survey targeted at NCAs Q3.7; Survey targeted at EU CSOs Q3.5 (See Annex VII): 20 of 25 NCAs believed that the current weaknesses in the parking card reduce the possibility of persons with disability to exercise their right to free movement within the EU.

8 How do the options compare?

The policy options for policy areas A and B are compared in this Section against the criteria of effectiveness, efficiency, coherence, subsidiarity and proportionality. Based on this assessment, a preferred option is identified from both groups of measures and then extensively described in Section 9.

The main findings are summarised in a common format in Tables for each of the criteria in the following sub-sections. Based on the qualitative and quantitative assessments made, the tables also include numeric ratings of the options in relation to the effects that they have on the specific objectives, vis-à-vis the baseline scenario. When rating the policy options, the social, economic, digital, environmental impacts and the impacts on fundamental rights, competitiveness and SMEs assessed in Section 7 were all taken into account.

The baseline scenario is, by definition, rated with "0" in relation to each of the criteria. The other policy options, on the other hand, are scored on a scale from 1 to 3 in terms of their positive effects, where 1 represents a very small positive effect and 3 a very large positive effect compared to the baseline. In the same vein, -1 represents a very small negative effect and -3 a very large negative effect, again using the baseline as a benchmark. A score of "0" means that the option would not constitute a significant deviation from the baseline scenario.

8.1 Effectiveness

"Effectiveness" refers to the extent that the baseline, the policy options aimed at facilitating mutual recognition of disability status in the EU and the policy options aimed at ensuring the mutual recognition of EU parking cards help achieve their respective objectives, outlined in Section 5 - Figure 10. The ratings of the options in terms of effectiveness are summarised in Table 6 at the end of the Section. The key criteria to assess effectiveness are strictly related to the general objective and the specific objectives. In particular, policy options are assessed based on the extent to which they ease the free movement of persons with disabilities within the EU by (i) facilitating mutual recognition of disability status when persons with disabilities travel to or visit other Member States (policy area A) and (ii) ensuring mutual recognition of the EU parking card for persons with disabilities (Policy area B). Each policy area is assessed separately. Under Policy area A, both policy options, A1 and A2 score positively in terms of their effectiveness in the achievement of Specific Objective 1. By mandating the production and use of a European Disability Card, both policy options would effectively create an instrument to be used for mutual recognition of disability status, in line with Specific Objective 1. The format of the EDC would contribute to the effectiveness of the two policy options. Both NCAs and CSOs stressed, during the dedicated workshops, the importance of a common format for the EDC so that the Card becomes easily recognisable at European level and the providers of services offering preferential conditions find it easier to check disability status and do not mistrust users.²⁵⁸ By reducing the potential for fraud, the addition of security features will further facilitate the mutual recognition of disability status of cardholders especially for those with invisible disabilities, reducing uncertainty and costs related to the validity of the card.

Furthermore, awareness raising campaign and the set-up of national EDC websites would ensure that both national service providers in the sectors covered and persons with disabilities in each Member State know about the Card and its use. National information and awareness-raising activities carried out in an accessible manner would help spread information on the existence of the Card itself, a fundamental requirement for its diffusion and use among persons with disabilities, and ultimately for its effectiveness. National websites could become tools for persons with disabilities to obtain information on eligibility criteria, application procedures for the EDC and preferential conditions offered by service providers. NCAs and CSOs were in agreement on the potential effectiveness of such websites, and the majority of service providers replying to the survey claimed that they did receive requests from persons with disabilities on whether they

²⁵⁸ Workshop with CSOs held on 22 March 2023, workshop with NCAs held on 23 March 2023.

received preferential conditions in access to their services.²⁵⁹ This confirms the importance of having a unified source of information on the topic, especially once complemented by an EU-level website.

In terms of effectiveness, however, despite leading to improvements compared to the baseline, the main limit to option A1 would be its scope, as mutual recognition through the Card would only be ensured in the sectors of culture, leisure, sports and transport (the same sectors of the pilot EDC initiative). Hence, the policy option would fall short of achieving specific objective 1 for all services in the EU by failing to fully remove the uncertainty related to mutual recognition. On the other hand, option A2 would extend the validity of the EDC to all services (with or without remuneration) offering preferential conditions to persons with disabilities, and can therefore reasonably be expected to be more effective. The main reason is again related to uncertainty: option A2 would remove any uncertainty related to the provisions of preferential conditions abroad, even if most of the preferential conditions are found in sectors already covered by A1. The certainty of full mutual recognition is the main added benefit of option A2 relative to A1, and the reason why the policy option has a higher score on effectiveness.

Under Policy area B, both policy options B1 and B2 score positively, are also both found to have positive effectiveness towards the achievement of their specific objective. Firstly, making changes to the current policy scenario surrounding the Parking Card has been identified as an effective way of removing barriers to the full recognition of EU parking cards across Member States.²⁶⁰ The common security features following the updated Recommendation would make the parking card more uniform across MS, facilitating its recognition.

Some aspects of policy option B1 would, however, limit its effectiveness. An update to the Recommendation would maintain the voluntary nature of the adoption of the new security features and adherence to the EU parking card model. This has been among the main drivers of the divergence in the format and features of national parking cards, leading to MS adjusting their national systems and adapting to technological change in different ways. The actual implementation of the updates to the Recommendation proposed by policy option B1 would likely follow a similar process, with a potential further increase in divergence of the national parking cards as Member States gradually update the security features of their national models. In the end, the extent to which option B1 is effective would ultimately depend on how responsive Member States are to the updated Recommendation, but the previous experience of the parking card suggests that this is likely to be limited. The effectiveness of Policy option B2, on the other hand, is more certain: by taking the form of a binding legislative instrument, the policy option would make minimum requirements regarding the EU common parking card model and its security format and features mandatory. In the case of a Directive, some minor differences in implementation could still be expected across Member States, while increased alignment is more likely under a Regulation. Still, in both cases the policy would greatly contribute to the effectiveness of the policy option, by ensuring that Member States update their EU parking cards to comply with the new features in a harmonised fashion. In turn, greater homogeneity of the EU parking cards of different Member States would make recognition easier for authorities in charge of enforcing parking rights, improving the recognition of national parking cards across Member States in line with specific objective 2. For this reason, option B2 scores higher in terms of effectiveness.

²⁵⁹ Workshop with CSOs held on 22 March 2023, workshop with NCAs held on 23 March 2023; Survey on costs targeted at service providers Q10 (See Annex VII).

²⁶⁰ Participants in the workshop with NCAs and CSOs unanimously agreed on the importance of an update to the Recommendation 98/376/EC in order to avoid fraud and forgery and address new ways of controlling parking rights. Similarly, 22 out of 25 NCAs responding to the targeted survey declared that security features such as hologram or a QR code, whose inclusion in the soft guidelines is one of the key aspects of policy option B1, are effective to tackle fraudulent use of the Card.

Table 16 – Comparison of the effectiveness of options under Policy Areas A and B

Specific objective	Policy Option	Rating
	Baseline	0
SO1	Option A1	2
SO1	Option A2	3
SO2	Option B1	1
SO2	Option B2	3

Source: Authors' elaboration

8.2 Efficiency

'Efficiency' refers to the assessment of the identified costs with the benefits that were identified under the effectiveness criteria (see Tables 1-5, Annex 4.1 for a detailed overview of options' economic and social impacts). Due to the fact that not all benefits can be monetized, we operationalise efficiency as cost-effectiveness, looking at each category of stakeholder. Also in this case, all policy options are assessed relative to the baseline scenario. Table 17 at the end of the Section summarises the efficiency scores of the policy options.

Under Policy area A, both options score positively. Policy option A2 is expected to be more efficient towards the achievement of Specific Objective 1 than policy option A1. For both options, an important component of the costs is linked to the resources used by public authorities to adapt to EU legislation on the EDC and set up the national schemes for correct design and implementation of the Card, including all the additional measures foreseen by the policy option (such as the national website, awareness-raising campaign. Their final range would depend on several factors, including the overall efficiency of national bureaucracies and experience with similar initiatives. These costs are not expected to differ substantially between policy options A1 and A2.

The identified costs for service providers offering preferential conditions would be minor for both policy options. Overall, despite incurring some costs, the expected benefits for service providers will offset the costs, as reported by all service providers involved in all data collections. In Member States participating in the pilot EU Disability Card, adjustment costs will be lower for the limited number of service providers recruited by the National Authorities or who joined voluntarily the initiative.

EU residents with disabilities would experience significant cost savings for both policy options (details on the estimates of such savings are provided in Annex III). These would fully balance other costs, such as the symmetric cost of offering preferential conditions to Persons with Disability travelling from other Member States for services providers, incurred in the context of the policy and – by removing financial uncertainty linked to the decision to travel to other Members States for Persons with Disability – would boost the efficiency of the policy option. Given the extended scope of policy option A2, the cost savings would be greater than those in policy option A1. As a larger share of preferential conditions in terms of savings are offered in the sectors covered by policy option A1, the greater efficiency of option A2 relative to A1 comes also from the larger reduction in uncertainty for Persons with Disability, which is expected to compound the positive impacts on their participation in tourism. The provision of additional preferential conditions in relevant services paired with the removal of any uncertainty related to the provision of preferential conditions, imply that option A2 achieves greater benefits with comparable costs to option A1, and is therefore deemed more efficient.

Under Policy area B, policy option B2 is found to have moderate efficiency in the achievement of Specific Objective 2 while policy option B1 is not expected to be more efficient with respect to the baseline. Option B1 would not require Member States to make changes to their national parking card models. As discussed in Section 8.1 on effectiveness and mentioned in Section 7

on impacts, not all Member States are expected to follow the updated recommendation under option B1. Hence, while there would be costs compared to the baseline, total costs would be small. At the same time, total benefits would also be smaller because of the “soft” nature of the measure. For this reason, this option is not expected to be more efficient than the baseline. Policy option B2, on the other hand, would entail higher costs compared to the baseline and option B1, as it would require legislative changes and make the update of security features of the EU parking card mandatory for Member States. At the same time, the option would also lead to significantly higher cost savings compared to the baseline and option B1.

Table 17 – Comparison of the efficiency of options under Policy Areas A and B

Specific objective	Policy Option	Rating
	Baseline	0
SO1	Option A1	2
SO1	Option A2	3
SO2	Option B1	0
SO2	Option B2	1

Source: Authors’ elaboration

8.3 Coherence

“Coherence” refers to the consistency of each option with the values, aims, objectives and policy initiatives of the EU. Table 18 at the end of the Section summarises the ratings of the policy options in terms of coherence.

Under Policy area A, policy options A1 and A2 are assigned the same rating in terms of coherence, when compared to the baseline scenario. Both policy options would fit into a series of EU initiatives that have recently facilitated the movement of persons with disabilities in the EU. As mentioned in Section 3.5, these include Directive (EU) 2016/2102 (the Web Accessibility Directive), enacted to boost accessibility of the websites and apps of public sector bodies in the EU²⁶¹ and whose use to gain information on travel destinations or tourism bodies in different Member States may be helpful to persons with disabilities, and EU regulations establishing the rights of passengers with reduced mobility.²⁶² In this context, an initiative such as the EDC would fill a gap in current legislation tackling accessibility, but which leaves room for improvement on the recognition of disability status across different Member States.

The highest degree of coherence of the policy options in reaching specific objective 1 would be reached, however, in combination with the Pilot EDC initiative undertaken by the 8 EU MS having already introduced an EDC scheme. Both policy options would absorb the mainstreamed Pilot initiative and its goal of starting a process of mutual recognition of disability status, extending its effects to all EU MS. Option A1 would maintain the scope of the pilot in terms of sectors, while option A2 would extend the scope to all services in the internal market.

Under Policy area B, the policy options are assigned the same ranking and are found to be coherent with the current EU policy scenarios in terms of parking rights for persons with disabilities. By replacing Recommendation 98/376/EC (either through an update or a binding legislative instrument) the options would update and improve standards on the security format and features of the parking card. At the same time, the options would be consistent with other EU policies facilitating mobility of persons with disabilities, including EU regulations on the rights of passengers with reduced mobility, which are mainly targeting transport by means other than

²⁶¹ European Parliament and Council, Directive 2016/2102 of 26 October 2016 on the accessibility of the websites and mobile applications of public sector bodies. Available at: [link](#).

²⁶² Rights for travellers with disabilities or reduced mobility, Your Europe website. Available at: [link](#).

cars (including air travel, travel by sea and inland waterways, travel by bus or coach and travel by train).²⁶³

Table 18 – Overview of ratings of the baseline and policy options in terms of coherence

Specific objective	Policy Option	Rating
	Baseline	0
SO1	Option A1	3
SO1	Option A2	3
SO2	Option B1	3
SO2	Option B2	3

Source: Authors' elaboration

8.4 Subsidiarity and proportionality

“Subsidiarity and proportionality” refer to whether the policy options are appropriate and do not go beyond what is necessary to address the problems satisfactorily.

Policy options concerning the European Disability Card (policy area A) respect the principles of subsidiarity and proportionality. The options aimed at facilitating mutual recognition of disability status when persons with disabilities travel to or visit other Member States create an instrument that acts as proof of disability, but do not alter national definitions and assessment criteria for disability status. Hence, they do not go beyond what is necessary and appropriate for EU action.

The options aimed at ensuring mutual recognition of the EU parking card for persons with disabilities (policy area B) are also considered proportionate. On one hand, option B1 is expected to be compliant with the principles of subsidiarity and proportionality of EU action. Its scope would not alter the existing framework for the parking card, whose model is described in Recommendation 98/376/EC, and would rather focus on updating its content with a view to ensuring the achievement of specific objective 2. Consequently, it would not go beyond what is appropriate for EU action. On the other hand, option B2 would affect Member States more compared to the baseline and to option B1, by requiring legislative changes at the national level. Nevertheless, the option would only require common rules on the model and the security format and features of the parking card, justified by the need to ensure full recognition of the card across Member States in line with specific objective 2. Policy option B2 would not affect Member States' power to determine the parking rights granted to cardholders at the national level. Therefore, it would also not exceed what is considered as appropriate for EU action.

8.5 Ranking of the policy options

This section draws conclusions on the findings of Section 8 and identifies the preferred policy option, as the one having the highest score. To this end, Table 19 provides an overview of the scores obtained by each policy option in relation to the criteria and the specific objective of interests. Given that one of the policy options (A2) has scores greater or equal with respect to all criteria, using uniform weights or different weights for the criteria would yield the same conclusion in terms of preferred policy option.

²⁶³ Rights for travellers with disabilities or reduced mobility, Your Europe website. Available at: [link](#).

Table 19– Overview of ratings of the baseline and policy options aimed at facilitating mutual recognition of disability status in the EU

Criteria	Baseline	Option A1	Option A2	Option B1	Option B2
Effectiveness	0	2	3	1	3
Efficiency	0	2	3	0	1
Coherence	0	3	3	3	3
Total	0	7	9	4	7

Source: Authors' elaboration

Policy option A2 is identified as the measure with the highest score among options aimed at facilitating mutual recognition of disability status in the EU (policy area A) as well as per criterion. For this reason, no sensitivity check to different weighting schemes is needed. While the option would have higher total costs compared to the baseline, the magnitude of these costs would be limited for both national authorities and service providers, and would be partly compensated by cost savings for service providers (including potentially higher turnover due to paying persons accompanying Persons with disability) and significant benefits for persons with disabilities. Benefits increase disproportionately the more MS adopt the card, which in turns leads to greater economic and social benefits than the baseline scenario. At the same time, in comparison to option A1, option A2 is similar but entails higher benefits for persons with disabilities due to the wider scope the EDC would have in terms of services, extending beyond the sectors of sports, leisure, culture and transport. At the same time, total costs for service providers would increase but would also largely be offset by cost savings and benefits, while implementation costs for public authorities in terms of producing, distributing and advertising the card would remain the same. Furthermore, thanks to its wider scope, option B2 would also lead to improvements in the participation in tourism of persons with disabilities to a greater extent than option B1, thus bringing more pronounced social and economic impacts.

Regarding the policy options aimed at ensuring the mutual recognition of the EU parking card for persons with disabilities (policy area B), option B2 is found to achieve the highest score in relation to specific objective 2. Option B2 is the most effective in ensuring the mutual recognition of EU parking cards, and this translates into its higher score even though it would be slightly more costly for MS than option B1. The same reasoning as above holds for the robustness of this ranking to different weighting schemes of the criteria for assessments: as policy option B2 consistently scores higher than option B1, no alternative weighting scheme would flip the ranking of policy options, and B2 will always rank as (marginally) superior.

9 Preferred policy option

A combination of policy option A2 (mandatory EDC model in all Member States for travelling and/or visiting purposes – all service sectors) with option B2 (mandatory EU parking card model) is found to be the most favourable and is therefore the preferred policy option.

Table 20 presents a comparative overview of the type of impacts for the **policy options aimed at facilitating mutual recognition of disability status in the EU in relation to access to services when visiting another Member State**

Table 20 - Comparative overview of impacts and related ratings for the effectiveness and efficiency criteria for policy options

Type of impacts	Baseline	A1	A2
Social	<ul style="list-style-type: none"> The travel gap (6.3 percentage points) of PWDs compared to the general population will remain constant The level of uncertainty regarding the availability of preferential conditions offered to PWDs when travelling across the EU Member States will remain high 	<ul style="list-style-type: none"> Reduction of the travel gap for PWDs: between 1.32 and 1.94 percentage points 	<ul style="list-style-type: none"> Reduction of the travel gap for PWDs of between 2.8 and 4.12 percentage points Removal of uncertainty related to the access to preferential conditions as all benefits currently offered to residents with disabilities will be offered also to non-residents with disabilities travelling for short-term stays
Economic	<p>Public authorities:</p> <ul style="list-style-type: none"> The cost of Production and delivery of the EDC: between 1.02 and 4.54 EUR per card Launch of an awareness-raising campaign: between a total of 20,000 and 70,000 EUR. <p>PWDs:</p> <ul style="list-style-type: none"> Economic loss ranges per short-term trip: between 30 and 140 EUR Economic loss ranges between 100 to 400 EUR for short term trips (4-days) and between 100 and 140 EUR for medium trip (2 months)²⁶⁴ Service providers: Time delays and extra burdens 	<p>Public authorities:</p> <ul style="list-style-type: none"> Production of the physical EDC: Similar estimates to those identified for the baseline scenario. These estimations might be even lower given that the common EDC format would reduce design costs Establishment of an IT system for the digital EDC: 1.67 million EUR for the whole EU Maintenance of an IT system for the digital EDC: 249,757 EUR per year for the whole EU Costs related to request for clarifications received from PWDs that ask whether some 	<p>Public authorities:</p> <ul style="list-style-type: none"> Same costs as A1 as concern production and delivery of the EDC Time savings as no requests for clarifications are expected considering that all benefits currently offered to residents with disabilities will be offered also to non-residents with disabilities travelling for short-term stays PWDs At least the same as A1, but including also preferential conditions present in the extra A2 sectors Service providers: The estimated direct cost of offering preferential

²⁶⁴ Both short-term and medium trip fall within the short-term stays (up-to 3 months).

Type of impacts	Baseline	A1	A2
	<p>associated with checking the different national disability cards or certificates to verify the proof of disability status</p> <ul style="list-style-type: none"> Impact on the whole economy Foregone benefit of not closing the travel gap in the whole EU in 2023: 4.5 billion EUR (upper bound) 	<p>services fall within the four sectors in scope of EDC</p> <ul style="list-style-type: none"> PWDs Savings for PWDs range between 30 to 140 EUR per short-term trip (4-days), and 100 to 400 EUR per medium-term trip (2 months). Service providers: The total yearly costs in the transport sector are estimated to range between 116 and 161 million EUR, accounting for only 0.05% to 0.08% of the turnover of (non-air) passenger transport in the whole EU-27. As the transport sector is one of the most exposed sectors to the offer of preferential conditions, the costs for offering preferential conditions in relation to the services of other sectors (e.g. culture, sports) would be even lower. Also, most of the service offer non-monetary benefits. <p>Impact on the whole economy</p> <ul style="list-style-type: none"> Value added in the market for accessible tourism: the estimates range from 1.32 to 1.94 billion EUR 	<p>conditions will be the same as A1</p> <ul style="list-style-type: none"> Impact on the whole economy Value added in the market for accessible tourism: the estimates range from 2.1 to 3.1 billion EUR
Environmental	<ul style="list-style-type: none"> Negligible impact 	<ul style="list-style-type: none"> Negligible impact on environmental footprint estimated in a range of 200 to 640 tonnes of CO2 equivalent 	<ul style="list-style-type: none"> Same as A1
Administrative costs	<ul style="list-style-type: none"> 	<ul style="list-style-type: none"> Not expected to entail any substantial administrative costs 	<ul style="list-style-type: none"> Same as A1
Final rate Effectiveness (see	0	2	3

Type of impacts	Baseline	A1	A2
explanation below)			
Final rate Efficiency (see explanation below)	0	2	3

Under the **baseline scenario**, the travel gap of persons with disabilities compared to the general population will remain constant. Also, the level of uncertainty regarding the availability of preferential conditions offered to persons with disabilities when travelling across the EU Member States will remain high. Therefore, the baseline scenario is not expected to contribute towards the achievement of Specific Objective (SO) 1 (i.e. to facilitate the mutual recognition of disability status when persons with disabilities travel to other Member States). Also, the **baseline scenario** has been rated as not efficient due to the economic loss for persons with disabilities as well as for the whole economy (4.5 billion in 2023).

Policy option A1 scores positively of its effectiveness in the achievement of SO1. By mandating the production and use of a European Disability Card policy option 1 is expected to facilitate the mutual recognition of disability status when persons with disabilities travel to other Member States. This is expected to reduce the travel gap of persons with disabilities by a range of 1.32 – 1.94 percentage points. However, despite leading to higher social impacts compared to the baseline, the main limit of option A1 would be its scope, as mutual recognition through the Card would only be ensured in the sectors of culture, leisure, sports and transport (the same sectors of the pilot EDC initiative). Hence, option A1 would fall short of achieving specific objective 1 for all services in the EU by failing to fully remove the uncertainty related to mutual recognition. The cost-effectiveness of **policy option A1** is expected to be higher than the baseline scenario. More precisely, option A1 will entail some costs for public authorities and service providers related to the production and delivery of the cards as well as to the offer of preferential conditions also to the non-residents with disabilities. However, the identified costs are expected to be small and they will be offset by benefits for persons with disabilities as well as for the whole economy. service providers offering preferential conditions would be minor for both policy options. Indeed, it is expected that beyond the benefits in terms of social impacts (see explanations of the effectiveness rate) persons with disabilities will save between 30 to 140 EUR per short-term trip (4-days), and 100 to 400 EUR per medium-term trip (2 months). Also, policy option A1 it is expected to lead towards beneficial impacts on the whole economy. Indeed, under policy option A1 the value added to the market of accessible tourism it is estimated in a range between 1.32 to 1.94 billion EUR.

On the other hand, **policy option A2** would extend the validity of the EDC to all services (with or without remuneration) offering preferential conditions to residents with disabilities leading in turn to a removal of the uncertainty related to the preferential conditions available for persons with disabilities when they travel abroad. Also, due to its the broader scope, policy option A2, is expected to lead towards a higher reduction (between 2.8 and 4.12 percentage points) compared to policy option A1. Overall, due to its higher social impacts, policy option A2 is more effective towards the achievement of SO1. Also, the expected costs will be similar to those identified under policy option A1. However, policy option A2 is expected to bring higher benefits both in terms of social (see explanations of the effectiveness rate) and economic impacts. As for the latter the following benefits are expected:

- Time savings for public authorities due to a reduction of request for clarifications considering that all benefits currently offered to residents with disabilities will be offered also to non-residents with disabilities travelling for short-term stays;
- Savings for persons with disabilities that will apply to a broader range of services than those included under policy option A1 issued the overall impact on the whole economy
- The value added in the market for accessible tourism would range from 2.1 to 3.1 billion EUR-

Therefore, overall, policy option A2 gained a higher rate than A1 under the efficiency criterion.

Also, Evidence from the evaluation of the pilot EDC showed that **benefits clearly outweighed the costs for service providers**. More specifically, the majority of service providers consulted during the pilot study stated that:

- **They attracted new customers** by joining the programme. Indeed, cardholders are often accompanied by additional paying visitors (e.g. friends, members of the family), who otherwise would not have used the services, then **service providers actually sell more tickets due to the EDC**. Consultations with service providers conducted as part of the present assignment support this: 18 out of 21 service providers reported that cardholders are joined on average by 1-2 visitors paying a full ticket.
- **The service providers gained positive visibility** through the EDC.
- The service providers **improved their knowledge regarding accessibility** and services with inputs from persons with disabilities. More precisely, they affirmed to taking better account of persons with disabilities in their services and to have gained new insights for the future development of their services.

Furthermore, evidence from the evaluation of the pilot EDC showed that **neighbouring countries are the first destination of choice for persons with disabilities** since the geographical closeness is making travelling easier and cheaper. Indeed, the stakeholder consultations conducted in the context of the previous evaluation confirmed the need to **extend the EDC to all Member States, and in particular to neighbouring countries of current pilot Member States**, in order for the EDC to facilitate the cross-border mobility of persons with disabilities. Based on this evidence, it can be assumed that geographic proximity will affect travel patterns of cardholders of the new EDC. In turn, the **distributional impacts of the new EDC will be equally distributed across all Member States as all of them have neighbouring countries**, thus being potentially selected as destination of persons with disabilities travelling across the EU.

Table 21 presents a comparative overview of the type of impacts for the **policy options aimed at facilitating use and legal certainty of the EU parking card for persons with disabilities**.

Table 21 - Comparative overview of impacts and related ratings for the effectiveness and efficiency criteria

Type of impacts	Baseline	B1	B2
Social	<ul style="list-style-type: none"> • The level of uncertainty regarding the recognition of national parking cards will remain high 	<ul style="list-style-type: none"> • Negligible reduction of the travel gap for PWDs 	<ul style="list-style-type: none"> • Removal of the uncertainty regarding the recognition of PWDs' EU parking card • Reduction of travel gap for PWDs between 0.27 and 0.4 percentage points
Economic	<p>Public authorities:</p> <ul style="list-style-type: none"> • Potential costs of updating the security features of the EU parking card in response to the increased number of cases of fraud and forgery • Costs related to increased knowledge (e.g. collection of information, staff training) on the different formats of 	<p>Public authorities:</p> <ul style="list-style-type: none"> • Reduction in the enforcement costs for public authorities due to the enhanced security features of the EU parking card • Update of the format of the EU Parking Card with hologram: range between € 0.017 and € 0.25 per card, depending on the size and the foil used 	<p>Public authorities:</p> <ul style="list-style-type: none"> • Costs are the same as B1 • Benefits (i.e. <i>reduction in the enforcement costs</i>) are the same as B1 but they are more likely to happen due to the binding nature of B2 <p>PWDs:</p> <ul style="list-style-type: none"> • Expected benefits are the same as B1 but they are more likely

Type of impacts	Baseline	B1	B2
	<p>the EU Parking Cards available across MS</p> <p>PWDs:</p> <ul style="list-style-type: none"> The risk to incur costs related to parking fines (between 90 and 300 EUR per fine) will remain high The risk not to obtain preferential parking will remain high (with costs of up to 4 EUR per day) 	<ul style="list-style-type: none"> Serial number connected to a database: € 4 Establishment and update of national website: range between PPP EUR 7,524 and EUR 22,936 per Member State <p>PWDs</p> <ul style="list-style-type: none"> Time savings to obtain information on the mutual recognition of the EU parking card Costs savings per PWD in a range between 90 EUR and 300 EUR due to an expected decrease of the potential fines received <p>Service providers:</p> <ul style="list-style-type: none"> Negligible value added in the market for accessible tourism 	<p>to happen due to the binding nature of B2</p> <p>Impact:</p> <ul style="list-style-type: none"> Value added in the market for accessible tourism: range from 0.2 billion EUR to 0.3 billion EUR
Environmental	<ul style="list-style-type: none"> Negligible impacts 	<ul style="list-style-type: none"> Negligible impacts linked to the increased travel by car of cardholders following greater certainty in the recognition of EU parking card Negligible impacts linked to the increased production of the EU parking cards to replace those with outdated security features 	Same as B1
Administrative costs		<ul style="list-style-type: none"> Not expected to entail any substantial administrative costs 	Same as B1
Final rate Effectiveness (see explanation below)	0	1	3
Final rate Efficiency (see explanation below)	0	0	1

The **baseline scenario** will not be effective towards the achievement of SO2 (i.e. to ensure mutual recognition of the EU parking card for persons with disabilities) as the current differences affecting the mutual recognition of the EU parking card will still remain. Also, the **baseline scenario** is not expected to be cost-effective. Indeed, under the baseline scenario the cost for public authorities and persons with disabilities are not offset by any benefit.

The effectiveness of **policy option B1** towards the achievement of SO2 will be higher compared to the baseline scenario, as the changes in the Council Recommendation are expected to lead towards a higher harmonisation of EU parking cards across Member States, facilitating its recognition. However, the voluntary nature of option B1 would not ensure that the amendments will be uniformly implemented across Member States, thus limiting the overall effectiveness of policy option B1.

On the other hand, **policy option B2** due its binding nature is expected to lead towards higher harmonisation of the EU parking card across Member States. This will remove the uncertainty faced by persons with disabilities as concerns the recognition of the EU parking card across Member States. Also, policy option B2 is expected to lead towards a small reduction of the travel gap estimated between 0.27 and 0.4 percentage points. Hence, in turn, B2 ensures a higher effectiveness towards the achievement of SO2 compared to B1

Also, under **policy option B2**, public authorities incur in some costs that are offset by the reduction in terms of the enforcement costs as well as by higher benefits for persons with disabilities (see effectiveness rate).

Overall, the **two preferred policy options A2 and B2** respect the principles of **subsidiarity and proportionality** of EU action. They do not go beyond what is necessary to address the problem identified and achieve specific objectives 1 and 2. The measures would not impact on the definitions of disability of each Member State: MS would retain the power to determine disability status in accordance with their own assessment criteria and procedures enshrined in their national provisions of law. Policy option B2 would not affect MS' power to determine the parking rights granted to cardholders at the national level. It would only require common rules on the model and the security format and features of the parking card, justified by the need to ensure full recognition of the card across MS. Therefore, it would not go beyond what is considered as appropriate for EU action.

Finally, in terms of **general impacts**, positive social and economic impacts would result, mainly linked to increased travelling propensity of persons with disabilities and their increased participation in tourism. By removing barriers to the full recognition of their disability status in other MS, the policy would encourage persons with disabilities to travel more and enjoy the subsequent benefits, including greater participation in society, enhanced personal and social development and culture. Furthermore, positive spill over effects would occur in the market for accessible tourism, which would be positively affected by the policy. While the total impacts would not be huge, because of the relatively small share of persons with disabilities travelling compared to the total population, they would still be significant for the stakeholders involved. Small digital impacts are expected in terms of increased digitalisation of national administrations, as they would have to set up databases of cardholders to advance national enforcement of parking rights.

Overall, in terms of potential net benefits both A2 and B2 showed the highest results. Indeed, taking the lower bound of the value-added estimates (1 billion EUR for A1 and 2.1 billion EUR for A2), results in a net benefit of A1 of 0.55 billion EUR for A1 and 1.56 billion EUR for A2. As for policy option B2 it is expected a conservative net benefit of 0.056 billion EUR, considering the lower bound estimate of value-added impact (0.2 billion EUR).

Table 22 - Total estimates of benefits, costs and net benefits of the policy options

Policy Options	Lower bound total benefit - accessible tourism value added	Upper bound total costs	Conservative net benefit estimate
A1	1 billion EUR	0.44 billion EUR	0.55 billion EUR
A2	2.1 billion EUR	0.53 billion EUR	1.56 billion EUR
B1	-	-	-
B2	0.2 billion EUR	0.14 billion EUR	0.056 billion EUR

Source: author's own elaboration

The preferred policy option (A2 combined with B2) is expected to have impact **beyond the sum of their individual impacts**. Facilitating mutual recognition also in the parking sector (B2), in addition to all the internal market sectors where preferential conditions are offered to persons with disabilities (A2), is expected to have relevant multiplier effects in terms of reduced

uncertainty and costs savings for persons with disabilities, thus increasing both effectiveness and efficiency. Uncertainty is minimised given that cardholders have the certainty that they will be granted the same preferential conditions as nationals in all sectors of the internal market. This is particularly relevant for persons with disabilities which require additional flexibility when choosing their optimal means of transport for a given travel abroad, thus broadening the locations where they would be able to make a tourist trip (e.g. in areas not accessible by public transport). Moreover, the combined impact of both policy options is likely to minimise any distortions related to the choice of the mode of transport for persons with a disability who currently travel abroad. By having certainty both about the recognition of their disability card, and related transport discounts and reduced tariffs (including personal assistants), and their parking card, they would be able to make optimal decisions (i.e. not influenced by uncertainty) about the preferred mode of transport.

10 Indicators for monitoring

As part of this study, a monitoring framework has been developed, with a view to tracking the implementation of preferred policy options A2 and B2 throughout their life cycle. The aim of the framework is to evaluate the degree to which the preferred policy options achieved the expected impacts, and therefore contributed to the achievement of specific objectives 1 and 2. To this end, framework will track the development of identified problems and related drivers before and after the adoption of the preferred options, and also direct and indirect impacts of the policy intervention. In addition, it would help detect any weaknesses at the implementation stage that need corrective adjustments, and would inform any future ex-post evaluations and impact assessments. In addition, it would enhance transparency and accountability and help explain future progress towards the policy goals, as well as informing further debate and evidence-based policymaking. As per ToR, the monitoring framework presented in this section will be finalised after the adoption of the initiative. For the purpose of this study, the following three macro categories of monitoring indicators have been identified:

- **Implementation (input and output) indicators** aimed at monitoring the resources allocated and the short-term deliverables resulting from the initiative.
- **Application (results and impacts) indicators** aimed at evaluating the short and long-term effects of the initiative, with the aim to understand if the initiative reached its specific and general objectives.
- **Contextual indicators** aimed at evaluating other factors external to the initiative (e.g. macroeconomic conditions or other policies) that may facilitate or hinder the expected effects of the initiative.

All these indicators are presented in Table 24. It includes both quantitative and qualitative indicators, depending on the type of outcome being monitored and the availability of data (qualitative indicators or mixed quantitative/qualitative indicators are indicated in italics in the Table). For each indicator, potential sources for the data collection necessary are reported in parentheses. To the extent possible, all indicators should be RACER (i.e. relevant, accepted, credible, easy to monitor, robust).

Table 23. Monitoring indicators for the preferred policy option

Specific objectives	Operational objectives	Indicators	Sources of data
SO 1: To facilitate mutual recognition of disability status when persons with disabilities travel to or visit other Member States	<ul style="list-style-type: none"> • Ensure that persons with disabilities recognised in another country have access to preferential conditions • Ensure that the application systems are user friendly and accessible for potential beneficiaries • Facilitate social integration and travelling of persons with disabilities • Increase the availability of preferential conditions to persons with disabilities 	<ul style="list-style-type: none"> • Number of Member States having transposed the Directive to date • Number of complaints linked to the EDC (reported by persons with disabilities, service providers, including on fraud and/or forgery) • Level of satisfaction with the EDC perceived increased wellbeing and integration, higher cultural, sports, leisure participation and higher mobility, etc. • Number and share of persons with disabilities (overall and those travelling in the EU for short term stays) • Costs for service providers and national Authorities • Number of the EDC issued by Member States 	<ul style="list-style-type: none"> • Transposition checks • Member States' data (National and Local Authorities) • SOLVIT platform complaints • Potential ad hoc survey/study

Specific objectives	Operational objectives	Indicators	Sources of data
SO2: To ensure mutual recognition of the EU parking card for persons with disabilities	<ul style="list-style-type: none"> Ensure that persons with disabilities recognised in another country can use the parking facilities Facilitate the enforcement of rules related to parking rights for persons with disabilities Ensure that the application systems is user friendly and accessible for potential beneficiaries 	<ul style="list-style-type: none"> Number of complaints as to cases of lack of recognition of the EU parking Card (reported by persons with disabilities and/or national Authorities) Number and type of reported cases of fraud or forgery of the European Parking Card Number of revised parking cards issued by Member States Costs for national Authorities 	<ul style="list-style-type: none"> Member States' data (National and Local Authorities) SOLVIT platform complaints Potential ad hoc survey/study
Common to both specific objectives	<ul style="list-style-type: none"> Improve information on how to get and use the European Disability Card and the EU parking card. 	<ul style="list-style-type: none"> % of people who are satisfied with information provided The number of websites containing the information how to get and use the cards and their accessibility Frequency of use of the section of Your Europe portal providing information on the EU parking card (e.g. yearly number of visitors of these websites) Number and scale (participation, turnout, duration, funding) of awareness raising campaigns Number of European Disability Cards/EU parking card applications (through national application procedures), and issued in each Member State 	<ul style="list-style-type: none"> Potential ad hoc survey/study Member States' data (National and Local Authorities)

Source: Author's elaboration

Some of the proposed indicators will be fed with information whose collection is already foreseen by the policy options, such as the number of persons applying for the EDC or the number of the EU parking card holders. Others may require the design of new data collection mechanisms or the integration of existing EU surveys, such as EU-SILC. It is expected that national authorities will introduce monitoring systems the facilitate data collection on the key performance indicators. As indicated in Table 25, some of the proposed indicators will be fed with information whose collection is already foreseen by the policy options. The number of persons applying for the EDC or the number of parking card holders, for instance, are stored by public authorities during the process of production and distribution of the cards. In the context of this Study, the number of EDC holders for those Member States participating in the Pilot EU Disability Card initiative was indeed collected easily by public authorities. Similarly, the number and scope of preferential conditions offered by service providers following the implementation of option B2 are to be collected by administrations as part of the administrative obligations foreseen by the measure. Still, Member States may differ in the way they implement these obligations and collect information required for monitoring. The legislative instruments foreseen by policy options A2 and B2 would thus need to ensure that the collection of monitoring indicators is as homogeneous as possible across Member States.

Other monitoring indicators may instead be more challenging to collect and may require the design of new data collection mechanisms or the integration of existing EU surveys, such as EU-SILC. For instance, recent quantitative information on the travelling patterns of persons with

disabilities has proven scarce during the data collection conducted during the Study, and would require a more systematic approach to the collection such data, including dedicated questions or ad-hoc modules in future EU survey. The plan to include the GALI index in all future EU surveys (as currently in the EU-SILC) implies that a reliable proxy of disability will be available even though it will not be possible to know whether a given respondent reporting activity limitations has or used the Card. Other indicators will be more difficult to measure, requiring either ad-hoc surveys or other data collection strategies such as the organisation of workshops, interviews or focus groups. For what concerns contextual indicators, attention should be paid not to directly attribute any changes in future trends of participation in tourism of persons with disabilities directly to the policy options in question, as many factors can affect the decision to participate in tourism for this category of stakeholders, such as accessibility concerns or macroeconomic conditions. The implementation strategy and timeline coupled with the variety, level of detail and aggregation, and frequency of the data collected, both directly related to the initiative but also to contextual indicators, will ultimately determine the feasible evaluation methods which can be employed, such as counterfactual analysis.

For what regards the monitoring of the Directive's implementation, the Commission shall consider addressing any relevant issues through meetings with Member States, thus facilitating mutual learning and exchange of good practices. Every five years from the entry into force of the Directive, the Commission shall publish a report on its implementation, based on information collected from the Member States, as well as service providers or disability-related CSOs.

Appendix

Summary of the synopsis report

Overview of the consultation activities

Overall, the study entailed the following consultations:

- **Call for evidence:** it was open for four weeks from 23 November 2022 to 9 January 2023 with the aim of gathering the views of relevant stakeholders on the Commission's understanding of the problem and possible solutions and to share any relevant information that they may have on the initiative. It received 272 replies from different groups of stakeholders, 265 including EU citizens (188), Civil society organisations (49), companies (8), public authorities (7), business associations (5), trade unions (2), non-EU citizens (2) and consumer organisations (1).
- **Public consultation:** it was open for 12 weeks from 16 February 2023 until 5 May 2023 and included a standard questionnaire, an accessible Word Document (AWD) and the easy-to-read (ETR). In total, there were 3361 responses to the three questionnaires (1204 to the Standard, 2135 to the ETR and 22 to the AWD). Respondents were from the following categories: EU citizens (2526), NGOs (245), public authorities (114), businesses or business association (134), Academic/research institution 133, non-EU citizen (22), trade unions (21), consumer organisations (17). The number of respondents who indicated to have a recognised disability or impairment is 1929. In addition, 708 respondents to either the standard questionnaire or the ETR version consider themselves as persons with disabilities but without having a recognised (i.e. officially according to their national/ regional legislation) disability or impairment.
- **Ten targeted interviews** were conducted with three EU bodies, two EU-level CSOs, two EU parking associations, as well as a disability expert.
- **Five online surveys** were targeted respectively at: persons with disabilities; EU service provider associations and their national members; EU-level and national CSOs; and National Competent Authorities (NCAs) and other relevant public authorities in the Member States. In total, 90 responses were received from 22 Member States (AT, BE, CY, CZ, DE, EE, EL, ES, FI, FR, IT, HR, HU, LT, LU, LV, MT, PL, PT, RO, SE and SI).
- An additional **questionnaire** was targeted at national service providers in order to gather information on the costs and impacts of offering benefits and/or preferential conditions to persons with disabilities from other Member States. In total, 23 responses were received from service providers operating in 13 Member States (BE 3, CY 1, DE 1, EE 2, ES 1, FI 1, HU 2, LU 1, LT 1, MT2, RO1, SI 5, SK 2) in the following sectors: Public Transport (3), Private Transport (1), Parking (1), Travel Agencies (1), Services in the Field of Tourism (1), Sports Centers (1), Cultural Services (6), Amusement Parks (3), Other services (6).
- **Two online workshops** were conducted with national and EU-level CSOs and members of the EU Disability Platform²⁶⁶ respectively. The first one, held on 22 March 2023, involved seven representatives of EU-level CSOs and four representatives of national CSOs. The second one, taking place on 23 March 2023, involved national authorities that are members of the EU Disability Platform (29 participants from 20 Member States).
- **Case studies** were performed in six selected Member States (i.e. AT, BE, FI, FR, IT and RO) in order to examine different models and experiences of the implementation of the EU parking Card and to identify lessons learnt and recommendations on how to improve its functioning. In total, 22 interviews were conducted (AT 3, BE 5, FI 4, FR 3, IT 5, RO 2) with national or

²⁶⁵ Detailed statistics are available on the website of the webpage of the Call for evidence on the website of the European Commission (see at: [link](#)).

²⁶⁶ The Disability Platform is an initiative of the Strategy for the Rights of Persons with Disabilities to discuss relevant policy developments, exchange experiences and good practices, and reflect the diversity of disability. Available at: [link](#).

local public authorities, civil society organisations and parking associations to inform the case studies.

Results of consultation activities

- **Problems:** There was clear consensus amongst all stakeholders (i.e. persons with disabilities, EU-level stakeholders, national authorities, CSOs, and service providers) consulted during the study that national disability cards are not always accepted when persons with disabilities travel across the Member States. Particularly, NCAs and service providers participating in the conducted workshops highlighted that differences in terms of format and features of national disability cards and certificates hinder the recognition of disability status across the Member States. Similarly, stakeholders consulted through the online survey, the public consultation, the targeted interviews, the workshops and case studies agreed that national differences in terms of design and functioning of the EU parking card hinder its mutual recognition across the Member States. A large number of respondents to the online survey, public consultation and the workshops agreed that the limited acceptance of national disability card/EU parking card discourage persons with disabilities from travelling abroad, thus hindering the exercise of their free movement rights.
- **EU added value and necessity of a future EU initiative:** Overall, consulted stakeholders were in favour of an EU initiative towards mutual recognition of disability status in the EU for the purpose of access to preferential conditions for using certain services when persons with disabilities travel or visit other Member States-. Particularly, respondents to the online survey from all consulted categories (i.e. persons with disabilities, NCAs, CSOs and service providers) agreed that EU intervention would have a clear added value compared to action by individual countries towards facilitating mutual recognition of disability status among the Member States. Moreover, respondents to the public consultation across all categories largely agreed that EU intervention would be necessary to facilitate access to services offering preferential conditions for persons with disabilities in all Member State and improving the implementation of EU parking card across the EU.
- **Policy options:** The different categories of consulted stakeholders largely agreed on the introduction of a binding European Disability Card in all Member States. Some divergences emerged as to whether the European Disability Card shall be merged or not with the EU parking card for persons with disabilities. Specifically, most stakeholder categories (i.e. CSO, NCAs, service providers) consulted through the online surveys, the targeted interviews and the online workshops stated that the two cards shall be kept separate. Yet, the majority of respondents to the public consultation agreed that the two cards shall be merged.
- **Impacts:** Overall, CSOs and NCAs responding to the online surveys and participating in the workshops largely agreed that the introduction of a binding European Disability Card that obliges the Member States to grant the same preferential conditions to all EU citizens with disabilities travelling across the EU will have a positive impact on the free movement of persons with disabilities. Importantly, the majority of respondents to the public consultation largely agreed that the introduction of the European Disability Card would have no impact on regulatory charges. Finally, all service providers responding to the online survey agreed that the costs of implementing the European Disability Card would be offset and even exceeded by the returns in terms of service providers' visibility, reputation, attracting new customers and other benefits.

Annexes

Annex I – Synopsis report

This synopsis outlines the consultations that were organised as part of the work on the EU initiative on the European Disability Card (EDC) and the EU Parking Card and presents their main findings.

Consultation strategy

Outline of the consultation strategy

The objective of the consultations was to collect factual evidence and views concerning possible problems and necessary measures related to the free movement and mobility of persons with disabilities (PwDs) in the EU in order to support the preparation of an EU initiative.

A wide range of stakeholders operating at the international, EU and national levels were consulted. The stakeholder consultation included targeted online surveys and the public consultation, strategic and targeted interviews, focus groups and case studies (see table below).

Table 24 – Overview of the stakeholders reached through each consultation tool/method

Type of stakeholder	Call for evidence	PC	Strat. interv.	Online surveys	Targ. Interv.	Workshops	Focus groups	Case studies
General public	✓	✓		✓				
PwDs		✓		✓				
National competent authorities (NCAs) [other national public authorities (PAs)]	✓	✓		✓		✓		
National level Civil Society Organisations (CSOs)	✓	✓		✓		✓		
National service providers				✓		✓	✓	
EU-level Civil Society Organisations (CSOs)	✓	✓		✓	✓			
EU-level service providers						✓		
EU policy-makers (Commission)			✓					
EU bodies					✓			
EU parking associations					✓			✓
Researchers/academics		✓			✓			

Source: Authors' elaboration

Overview of consultation activities

Call for evidence

Call for evidence was open for consultation for four weeks from 23 November 2022 to 9 January 2023 with the aim of gathering the views of relevant stakeholders on the Commission's understanding of the problem and possible solutions and to share any relevant information that they may have on the initiative. It received 272 replies from different groups of stakeholders,²⁶⁷ including EU citizens (188), CSOs (49), companies (8), public authorities (7), business associations (5), trade unions (2), non-EU citizens (2) and consumer organisations (1). Respondents were from 19 Members States, with the biggest number from Belgium (77), Germany (47) and France (30). Three were around 20 in Italy (22) and Spain (20). There were between 5 and 9 replies from Finland (9), Ireland (8), the Netherlands (7), Austria (7), Poland (6), Slovakia (5) and Portugal (5). The group of Member States with four or less replies were Lithuania (4), Estonia (4), Sweden (3), Luxembourg (3), Greece (3), Romania (2), and Cyprus (2). In addition to the EU MS, there were replies from the UK (3) and Switzerland (1).

Public consultation

The aim of the public consultation was to ensure that the impact assessment and the proposal for a European Disability Card well reflects the general public interest across the EU. In particular, the consultation aims to: (i) gather service providers' and the general public's views on the initiative, (ii) collect opinions and evidence on the problem and various solutions (policy options) to address it, (iii) and create a robust and evidence-based analysis. The consultation was open for 12 weeks from 16 February 2023 until 5 May 2023. The standard questionnaire received 1204 responses, while the easy-to-read questionnaire received 2047 responses.

The stakeholder categories responding to the standard questionnaire, the Accessible Word Document (AWD) and the easy-to-read (ETR) questionnaire of the public consultation include:

Table 25 – Respondents to the public consultation per stakeholder category

Categories	Standard	AWD	ETR	Total
EU citizen	999	10	1517	2526
NGO/Environmental organisation	66	5	174	245
Public authority	29	4	81	114
Company/business/business association	25	1	108	134
Academic/research institution	23	0	110	133
Non-EU citizen	22	0	0	22
Trade union	4	0	17	21
Consumer organisation	3	0	14	17
Other	33	2	0	35
N.A.	0	0	114	114
Total	1204	22	2135	3361

Source: EY based on the results of the public consultation

The number of respondents who indicated to have a recognised disability or impairment is 1929 (757 from the standard, 12 from the AWD and 1160 from the ETR). In addition, 708 respondents to either the standard questionnaire or the ETR version consider themselves as persons with disabilities but without having a recognised (i.e. officially according to the national/ regional legislation) disability or impairment.

Given the fact that the ETR questionnaire comprised less questions than the standard one, the number of respondents varies across questions.

Strategic interviews

Strategic interviews at the beginning of the study explored the current EU legislation and policy context, legislation and policy initiatives in the field of disability, discussed the implementation

²⁶⁷ Detailed statistics are available on the website of the webpage of the Call for evidence on the website of the European Commission (see at: [link](#)).

of past EU initiatives (pilot EDC, EU parking card for PwDs), as well as the feasibility to introduce a mandatory EDC in all Member States. They were conducted with representatives of Directorate-General Justice and Consumers (DG JUST) and Directorate-General Mobility and Transport (DG MOVE).

Online survey

An online survey was conducted to (i) collect information on if and how preferential conditions are offered to residents and non-residents with disabilities accessing services in the Member States, (ii) understand the main problems at stake at both the EU and the national levels, as well as (iii) collect inputs on possible policy options.

Six different survey questionnaires were used, targeted respectively at (1) national Competent authorities, (2) PwDs EU-level service providers associations and their national members, (3) national CSOs, (4) EU-level Civil Society Organisations (CSOs), (5) other national public authorities and (6) service providers.

The survey ran from 25 January 2023 to 19 February 2023. The surveys have been administered and centrally managed in the context of the supporting study using the Qualtrics tool.

Respondents to the survey belong to the following stakeholders categories:

- **PwDs:** 24 from 4 Member States;²⁶⁸
- **EU service providers:** 2 from 2 Member states;²⁶⁹
- **EU-level CSOs:** 10;²⁷⁰
- **National CSOs:** 23 from 11 Member States;²⁷¹
- **NCA:** 25 from 15 Member States;²⁷²
- **PAs:** 5 from 3 Member States.²⁷³

The low number – as well as – the limited geographical coverage of responses received from persons with disabilities has been mitigated by responses of persons with disabilities to other consultation tools. Indeed, the high number of persons with disabilities responding to public consultations as well as the workshop held with CSOs working with persons with disabilities ensure that the views of persons with disabilities are adequately taken into account in the study.

Also, to the low number of service providers replying to this online survey, a second online questionnaire was launched at a later stage targeting 607 service providers in all Members States. It was focused on costs and benefits linked with the introduction of the EDC.

This second survey ran from 4 April 2023 to 26 April 2023. In total, 23 responses were received from service providers operating in 13 Member States²⁷⁴ in the following sectors: Public Transport (3), Private Transport (1), Parking (1), Travel Agencies (1), Services in the Field of Tourism (1), Sports Centres (1), Cultural Services (6), Amusement Parks (3), Other services (6): Accesibility consulting and services, Translation and Interpreting Services, Contribution to Education in Scientific and Technical Field, Tourism, Public Sector and one additional blank response. Most of the respondents reported high-level administrative roles in their organizations (e.g., managers, directors, secretary generals etc.).

The responses received are uniformly distributed with respect to the size of the firms: 6 Micro (1 to 9 employees), 5 Small (10 to 49 employees), 5 Medium (50 to 249 employees) and 7 Large (250 or more).

Targeted interviews

Targeted interviews were conducted with the aim to collect further evidence on gaps and issues affecting the exercise of free movement rights of PwDs travelling for short-term stays in the EU, as well as stakeholders' opinions on the EDC initiative. Specifically, ten targeted interviews were

²⁶⁸ Number of replies by MS: FR 2, HR 8, MT 11, PT 3.

²⁶⁹ Number of replies by MS: AT 1, BE 1.

²⁷⁰ EU-level CSOs do not represent any Member State.

²⁷¹ Number of replies by MS: AT 3, CY 1, EL 1, FI 1, FR 1.

²⁷² Number of replies by MS: BE 3, CY 2, CZ 2, DE 1, EE 2, EL 1, ES 4, IT 1, LT 1, LU 3, MT 1, PL 1, RO 1, SE 1, SI 1.

²⁷³ Number of replies by MS: BE 1, CZ 3, LV 1.

²⁷⁴ Number of replies by MS: BE 3, CY 1, DE 1, EE 2, ES 1, FI 1, HU 2, LU 1, LT 1, MT2, RO1, SI 5, SK 2.

performed with three EU bodies, two EU-level CSOs, two EU parking associations and an expert in the field of disability. The interviews were conducted online via Teams, based on tailored guidelines.

Workshops

During the study, the Team organised three online workshops, involving respectively 11 EU and national CSOs (22 March 2023), 29 national public authorities that are members of the EU Disability Platform (23 March 2023), and 18 national service providers (11 May 2023).

The workshops aimed to share and validate preliminary results from the study and to discuss (i) the problems that affect the exercise of free movement rights for PwDs in the EU, (ii) possible EU measures to address the identified problems and (iii) the likely impacts of these possible EU measures in terms of both positive and negative effects.

The workshops consisted of a (1) plenary session, where the Team presented the identified problems, the policy objectives, and the list of identified policy measures; (2) break-out sessions during which both open questions and polls (were addressed and discussed with smaller groups of participants; and (3) second plenary session in which the outcomes of the break-out sessions were discussed.

Focus group

Originally, the consultation strategy included six focus groups with services providers from selected Member States (i.e., AT, BE, FI, FR, IT and RO), with the aim to collect information on the likely impacts stemming from the adoption of the EDC, including potential costs of offering preferential conditions to PwDs from other Member States. However, despite the attempts – through emails, including reminders – to contact service providers from the six Member States only service providers from Romania confirmed their availability to participate in a focus group that was held on 27 April 2023, online, in Romanian language. It involved 14 service providers (i.e., three from the culture sector, ten from transport section (nine public and one private), and one from the sports sector). Also, as mitigation measure to low number of responses received to the focus group with service providers a workshop with service providers from all Member States was organised (see section below).

Case studies

Six case studies were performed on Austria, Belgium, Finland, France, Italy, and Romania in order to present different models and experiences on the implementation of the EU parking card and to draw lessons learnt and recommendations on how to improve its functioning. As part of the case studies, interviews were conducted with:

- Seven public authorities responsible for the EU parking card's entitlement, issuance, and delivery, either at local or national level in five Member States (AT, BE, FR, IT, RO),
- Seven CSOs representing or advocating the rights of PwDs in five Member States (AT, BE, FI, FR, IT),
- Four parking associations in four Member States (BE, FI, FR, IT).

Semi-structured interviews were conducted based on the interview guidelines via Teams and lasted up to one hour. The interview minutes have been shared with the interviewees for review and to enable them to share any additional information.

Results of the consultation strategy

This chapter presents the main findings derived from the various consultation activities.

Call for Evidence

Key findings are presented following the three main themes in replies: problems, policy options and impacts.

Problems were mainly raised by EU citizens and CSOs. Lack of mutual recognition of disability status limits recognition and acceptance of the national disability cards abroad and it is a great effort and time expenditure for PwDs to plan travels (6 EU Citizens, 17 CSOs, 2 Other) and to use the card for accessing benefits, getting assistance and, more generally, enjoying their rights abroad (33 EU Citizens, 15 CSOs).

Policy options

The majority of respondents were in favour of an **EDC that:**

- Is mutually recognised across the EU (97 EU Citizens, 20 CSOs, 1 SME, 1 Other);
- Provides for access to same preferential conditions already granted by Member States to residents with disabilities, regardless of the areas or services (21 EU Citizens, 20 CSOs, 7 Other).

Regarding the card's **design**, respondents proposed the following features:

Double format, i.e., digital (including a QR Code) and plastic format (6 EU Citizens, 1 PA, 23 CSOs, 2 Other).

A common pictogram, including the logo of the related disability type in order to make any stakeholders aware about specific situations and related needs (e.g., for cochlear implant users, captioning, speech-to-text, etc.) (7 EU Citizens, 1 PA, 3 CSOs, 2 Other).

A relief structure in the form of a scannable embossed alpha numerical information (as braille printing) (2 EU Citizens, 4 CSOs, 1 other).

- Finally, respondents proposed the establishment of the following **mechanisms** that would further enhance the **implementation** and the **use** of the EDC:
 - **An EU database/website** to be fed by the national authorities responsible for defining the eligibility criteria to receive the card and for issuing it, collecting information on the number of both eligible persons and cards released, recording cases of fraudulent use of the card (1 EU Citizen, 3 PAs, 23 CSOs, 1 SME).
 - **An EU-wide control system and an EU authority to oversee** and monitor compliance with the rules concerning the EDC, working with national authorities to ensure proper implementation of the EDC by all the Member States and stakeholders (1 EU Citizen, 2 PAs, 14 CSOs, 1 Other).
 - An **EU-wide awareness-raising campaign** to inform all the stakeholders involved (users, service providers, national authorities, general public, etc.) about the card, its features and benefits (1 EU Citizen, 1 PA, 16 CSOs, 1 SME).
 - Importantly, some respondents claimed that **the EDC should be introduced through a binding legislation**, preferably a regulation, to avoid differences in implementation of the EDC at national level (1 EU Citizens, 1 PA, 24 CSOs, 4 Other).

Impacts

Respondents welcomed the initiative, emphasising that **the adoption of a mutually recognised EDC will promote inclusion and more equal opportunities for PwDs**. In fact, respondents noted that **the adoption of the EDC will:**

- Improve the independence, the life and living conditions of PwDs and their families (28 EU Citizens, 12 CSOs, 3 PAs, 2 SMEs);
- Facilitate the freedom of movement for PwDs in the EU, also making easier travelling in Europe (92 EU Citizens, 43 CSOs, 15 Other).

Lastly, beyond the above-mentioned positive impacts, respondents pointed out some **concerns about costs incurred by service providers** with respect to:

- **Investments into infrastructure, technologies, people and skills**, depending on the type of disability (2 EU Citizens, 6 CSOs, 5 Other);
- Handling of sensitive customers data (4 EU Citizens, 11 CSOs).

Public consultation

Problem definition

- 354 of 769 PwDs stated their disability status is not recognised across MS. Moreover, 377 of 1160 PwDs specified their disability card is not accepted when they travel across the EU.
- Several respondents claimed that the lack of mutual recognition of disability status in the EU represents an **obstacle for PwDs to exercise their free movement rights** (754 of 1009 EU citizens, 55 of 71 NGOs, 24 of 33 public authorities, 17 of 26

companies/businesses/business associations, 18 of 23 academic/research institutions, 15 of 22 non-EU citizens, and 559 of 769 PwDs across all categories). More specifically, the following factors were mentioned as highly hindering the free movement of PwDs in the EU:

- **Different treatment of non-residents with disabilities compared to residents with disabilities:** 684 of 1009 EU citizens, 56 of 71 NGOs, 20 of 33 public authorities, 16 of 23 academic/research institutions, 16 of 22 non-EU citizens, and 510 of 769 PwDs across all categories;
- **Limited provision of preferential conditions offered by certain services to non-residents:** 664 of 1009 EU citizens, 56 of 71 NGOs, 19 of 33 public authorities, 16 of 23 academic/research institutions, 20 of 22 non-EU citizens, and 505 of 769 PwDs across all categories;
- **Lack of publicly available information on preferential conditions for PwDs:** 777 of 1009 EU citizens, 62 of 71 NGOs, 24 of 33 public authorities, 17 of 23 academic/research institutions, 18 of 22 non-EU citizens, and 593 of 769 PwDs across all categories.
- According to most representatives from NGOs (38 of 71), **PwDs are discouraged from travelling because their disability status is not fully recognised.**
- 140 of 650 PwDs highlight they have **problems when they use the EU parking card.**
- Several respondents pointed out that the **implementation of the EU parking card for PwDs is significantly hindered by:**
 - Its **limited mutual recognition across the Member States:** 665 of 1009 EU citizens, 50 of 71 NGOs, 15 of 33 public authorities, 16 of 23 academic/research institutions, and 487 of 769 PwDs across all categories;
 - **National differences in terms of conditions attached to the card** (e.g. validity period, conditions for priority parking, etc.): 609 of 1009 EU citizens, 44 of 71 NGOs, 15 of 33 public authorities, 13 non-EU citizens, 2 consumer organisations, and 453 of 769 PwDs across all categories.

Necessity of EU action

- Several respondents claimed that the **EU action is needed to:**
 - **Facilitating mutual recognition of disability in the EU:** 945 of 1009 EU citizens, 66 of 71 NGOs, 27 of 33 public authorities, 17 of 26 companies/businesses/business associations, 21 of 23 academia/research institutions, 20 non-EU citizens and 4 of 4 trade unions, and 705 of 769 PwDs across all categories;
 - **Facilitating access to those services offering preferential conditions to PwDs:** 935 of 1009 EU citizens, 616 of 71 NGOs, 22 of 33 public authorities, 15 of 26 companies/business associations, 20 of 23 academia/research institutions, 20 non-EU citizens and 4 of 4 trade unions, and 702 of 769 PwDs across all categories;
 - **Improving the implementation of the EU Parking card for PwDs:** 844 of 1009 EU citizens, 59 of 71 NGOs, 26 of 33 public authorities, 16 of 26 companies/businesses/business associations, 19 of 23 academia/research institutions, 18 non-EU citizens and 4 of 4 trade unions, and 639 of 769 PwDs across all categories.

Policy options

- 445 of 769 PwDs think that the **European Disability Card would increase their own travelling to other Member States.** Indeed, according to 1107 out of 1160 of PwDs a European Disability Card would help them to travel across the EU;
- Also, most respondents think that **the European Disability Card would increase the number of PwDs travelling across the EU:** 676 of 1009 EU citizens, 48 of 71 NGOs, 14 of 26 companies/businesses/business associations, 13 of 23 academia/research institutions, 19 non-EU citizens, 4 of 4 trade unions and 2 consumer organisations, and 515 of 769 PwDs across all categories;

- Most respondents think that the **European Disability Card should be binding for all Member States**, without the possibility of opting out: 874 of 1009 EU citizens, 60 of 71 NGOs, 24 of 33 public authorities, 19 of 26 companies/business associations, 20 of 23 academia/research institutions, 17 non-EU citizens, 3 consumer organisations, and 669 of 769 PwDs across all categories;
- Also, most respondents think that the **EU parking card should be incorporated into the new European Disability Card**: 2083 of 2526 EU citizens, 192 of 195 NGOs, 78 of 114 public authorities, 107 of 112 companies/business associations, 113 of 133 academia/research institutions, 18 of 22 non-EU citizens, 14 of 21 trade unions, 15 of 17 consumer organisations, and 1592 of 1929 PwDs across all categories;
- The majority stated that **the EDC should have the form of both plastic and electronic (mobile phone application) card**: 1724 of 2526 EU citizens, 191 of 195 NGOs, 81 of 114 public authorities, 99 of 112 companies/business associations, 93 of 133 academia/research institutions, 15 of 22 non-EU citizens, 13 of 21 trade unions, 10 of 17 consumer organisations, and 1333 of 1929 PwDs across all categories;
- According to the vast majority of respondents, the main sectors that should be included in the EDC are **public transport** (1821 of 3361), **cultural activities** (1566 of 3361) and **parking** (1534 of 3361) should be included in the EDC.

Impacts

- Overall, respondents think that the introduction of the European Disability Card would have a **strong to very strong impact** on:
 - **Increasing access to services offering preferential conditions for PwDs** when travelling in the EU (860 of 1009 EU citizens, 60 of 71 NGOs, 20 of 33 public authorities, 15 of 26 companies/businesses/business associations, 17 of 23 academic/research institutions, 20 of 22 non-EU citizens, 4 of 4 trade unions, 3 of 3 consumer organisations, and 650 of 769 PwDs across all categories);
 - **Simplifying mutual recognition** of preferential conditions for PwDs (861 of 1009 EU citizens, 64 of 71 NGOs, 23 of 33 public authorities, 16 of 26 companies/businesses/business associations, 19 of 23 academic/research institutions, 18 of 22 non-EU citizens, 4 of 4 trade unions, 3 of 3 consumer organisations, and 652 of 769 PwDs across all categories);
 - **Increasing the take up of cultural, leisure, sports, and travel services** of PwDs when travelling across the EU (856 of 1009 EU citizens, 61 of 71 NGOs, 20 of 33 public authorities, 14 of 26 companies/businesses/business associations, 15 of 23 academic/research institutions, 20 of 22 non-EU citizens, 4 of 4 trade unions, 3 of 3 consumer organisations, and 650 of 769 PwDs across all categories);
 - **Increasing the opportunity** for PwDs **to exercise fully their right of travelling** across the EU (846 of 1009 EU citizens, 59 of 71 NGOs, 22 of 33 public authorities, 18 of 26 companies/businesses/business associations, 18 of 23 academic/research institutions, 20 of 22 non-EU citizens, 4 of 4 trade unions, 3 of 3 consumer organisations, and 634 of 769 PwDs across all categories);
 - **Increasing the frequency of travel** of PwDs in the EU (687 of 1009 EU citizens, 55 of 71 NGOs, 12 of 33 public authorities, 13 of 26 companies/businesses/business associations, 12 of 23 academic/research institutions, 20 of 22 non-EU citizens, 2 of 4 trade unions, 2 of 3 consumer organisations, and 518 of 769 PwDs across all categories); and
 - **Increasing the number of PwDs travelling** in the EU (679 of 1009 EU citizens, 51 of 71 NGOs, 17 of 33 public authorities, 14 of 26 companies/businesses/business associations, 13 of 23 academic/research institutions, 19 of 22 non-EU citizens, 3 of 4 trade unions, 2 of 3 consumer organisations, and 519 of 769 PwDs across all categories).
- Overall, respondents think that the introduction of the European Disability Card would have no impact on:

- **Regulatory charges** (e.g. fees, levies and taxes, etc.): 528 of 1009 EU citizens, 43 of 71 NGOs, 21 of 33 public authorities, 14 of 26 companies/businesses/business associations, 13 of 23 academic/research institutions, 10 of 22 non-EU citizens, 3 of 4 trade unions, 1 of 3 consumer organisations, and 408 of 769 PwDs across all categories; and
- **Indirect costs** (e.g. price increases for the general public for services targeted by the card): 535 of 1009 EU citizens, 45 of 71 NGOs, 21 of 33 public authorities, 18 of 26 companies/businesses/business associations, 14 of 23 academic/research institutions, 9 of 22 non-EU citizens, 2 of 4 trade unions, 2 of 3 consumer organisations, and 410 of 769 PwDs across all categories.
- On the other hand, respondents expect an increase in costs, although mostly slightly, related to:
 - **Adjustment costs** (e.g. cost of implementing the card, cost of equipment): 549 of 1009 EU citizens, 51 of 71 NGOs, 25 of 33 public authorities, 22 of 26 companies/businesses/business associations, 13 of 23 academic/research institutions, 11 of 22 non-EU citizens, 3 of 4 trade unions, 0 of 3 consumer organisations, and 412 of 769 PwDs across all categories;
 - **Administrative costs of reporting** (e.g. storing information, holding databases, etc.): 492 of 1009 EU citizens, 45 of 71 NGOs, 26 of 33 public authorities, 20 of 26 companies/businesses/business associations, 16 of 23 academic/research institutions, 13 of 22 non-EU citizens, 3 of 4 trade unions, 1 of 3 consumer organisations, and 383 of 769 PwDs across all categories;
 - **Enforcement costs** (e.g. inspections, handling complaints, forgery control): 511 of 1009 EU citizens, 40 of 71 NGOs, 21 of 33 public authorities, 20 of 26 companies/businesses/business associations, 12 of 23 academic/research institutions, 9 of 22 non-EU citizens, 2 of 4 trade unions, 0 of 3 consumer organisations, and 377 of 769 PwDs across all categories; and
 - **Administrative costs of monitoring** (e.g. keep track of card use, etc.): 488 of 1009 EU citizens, 45 of 71 NGOs, 23 of 33 public authorities, 20 of 26 companies/businesses/business associations, 12 of 23 academic/research institutions, 13 of 22 non-EU citizens, 3 of 4 trade unions, 1 of 3 consumer organisations, and 370 of 769 PwDs across all categories.

Among other possible costs entailed by the adoption of the EDC, one public authorities (of two) mentioned that making services more accessible could cause an increase in costs (e.g. training of staff, restructuring of venues to make them more accessible etc.), which could however be offset by increased number of visitors. Companies/businesses mentioned that the introduction of the card may lead to costs related to carriers adaptations, including training ticket inspectors and adapting tools to read the new card (3 of 6). Increased numbers of passengers with disabilities might also require material adaptations in transport systems (2 of 6). One company/businesses/business associations (of 6) emphasised the potential economic benefits of an increased number of PwDs travelling with public transport.

- Most respondents think that the costs entailed by the European Disability Card would affect the following stakeholders only from a small to a medium extent:
 - **Member States' public administrations** (e.g. costs related to the delivery of the Card): 725 of 1009 EU citizens, 56 of 71 NGOs, 19 of 33 public authorities, 18 of 26 companies/businesses/business associations, 16 of 23 academic/research institutions, 15 of 22 non-EU citizens, 2 of 4 trade unions, 3 of 3 consumer organisations, and 539 of 769 PwDs across all categories;
 - **Large companies** (e.g. costs related to the provision of preferential conditions to EU tourists with disabilities): 719 of 1009 EU citizens, 46 of 71 NGOs, 25 of 33 public authorities, 20 of 26 companies/businesses/business associations, 16 of 23 academic/research institutions, 13 of 22 non-EU citizens, 2 of 4 trade unions, 2 of 3 consumer organisations, and 543 of 769 PwDs across all categories;

- **SMEs** (e.g. costs related to the provision of preferential conditions to EU tourists with disabilities): 710 of 1009 EU citizens, 50 of 71 NGOs, 25 of 33 public authorities, 20 of 26 companies/businesses/business associations, 16 of 23 academic/research institutions, 16 of 22 non-EU citizens, 2 of 4 trade unions, 2 of 3 consumer organisations, and 534 of 769 PwDs across all categories;
- **Public authorities** offering preferential conditions for persons with disabilities: 687 of 1009 EU citizens, 51 of 71 NGOs, 19 of 33 public authorities, 16 of 26 companies/businesses/business associations, 15 of 23 academic/research institutions, 14 of 22 non-EU citizens, 2 of 4 trade unions, 2 of 3 consumer organisations, and 508 of 769 PwDs across all categories;
- **Civil society organisations** (e.g. costs related to the provision of support in using the Card to Card holders with particular needs): 340 of 1009 EU citizens, 22 of 71 NGOs, 15 of 33 public authorities, 9 of 26 companies/businesses/business associations, 10 of 23 academic/research institutions, 6 of 22 non-EU citizens, 1 of 4 trade unions, 1 of 3 consumer organisations, and 255 of 769 PwDs across all categories;
- **Cultural venues and institutions**: 670 of 1009 EU citizens, 51 of 71 NGOs, 24 of 33 public authorities, 18 of 26 companies/businesses/business associations, 18 of 23 academic/research institutions, 11 of 22 non-EU citizens, 1 of 4 trade unions, 2 of 3 consumer organisations, and 496 of 769 PwDs across all categories.
- Most respondents from public authorities (21 of 33) and companies/businesses/business organisations (13 of 26) stated that **the costs entailed by the European Disability Card would affect their company/organisation** (costs related to individual services, etc.) **only to a small to moderate extent**.

Strategic interviews

Strategic interviews mainly focus on the identification of the legal base to justify the EDC initiatives as well as on problems related to the implementation of the EDC. In this regard, the main point of discussion were:

- The envisaged EU intervention should be supported by evidence of the problems faced by PwDs, and possibly magnitude thereof, whether they are mainly related to free movement or not. Questioning whether the **services in the scope of the EDC** are for remuneration or not. These elements are key to identifying the legal basis for the intervention: in particular, whether it should be based either on Article 21 of the Treaty on the Functioning of the European Union (TFEU)²⁷⁵ on the right of EU citizens to move and reside freely within the EU territory or on Article 56 TFEU on the freedom to provide services within the EU (in case of services for remuneration).
- Number of cases of fraud related to the use of the EU parking at raising the local level. Specifically, frauds relate to persons who e.g., cheated to demonstrate the disability status or that use the card of another person when they are not entitled to hold the Card. Therefore, some mechanisms should be introduced to prevent fraudulent activities and to ensure that cardholders genuinely hold the card based on their recognised disability status.

Online surveys

Problems

20 out of 24 PwDs and 10 of 25 NCAs stated that the proof of disability is normally needed to get access to preferential conditions. According to the 20 out of 25 NCAs, 17 out of 23 national CSOs and nine out of 10 EU-level CSOs, national disability cards and certificates are not always recognised in other Member States which represents an obstacle for PwDs to exercise their free movement rights and to access preferential conditions when using certain services abroad.

²⁷⁵ Consolidated version of the TFEU. Available at: [link](#).

When preferential conditions are not offered, the costs of travelling sustained by persons with disability increase to a large extent (11 PwDs, 19 NCAs, three other relevant public authorities, 14 national CSOs and nine EU-level CSOs).

As concerns the **EU parking card**, some NCAs (13), other public authorities (two), national CSOs (nine), EU-level CSOs (six) and PwDs (11) consider that the correct implementation of the EU parking card is hindered by its limited recognition across the Member States. Several stakeholders' groups (NCAs, national CSOs and EU level CSOs) pointed out that **the card's mutual recognition** across the Member States is hindered by **national differences** in validity period of the card, card design and rights granted by the card.

The necessity and added value of a possible EU action

The vast majority of respondents (21 PwDs, 22 NCAs, 3 other relevant public authorities, 10 EU-level CSOs and 22 national CSOs) argued that the **EU intervention would have particularly added value compared to what individual countries could do** towards facilitating mutual recognition of disability status among Member States. In their view, an EU intervention would be necessary to:

- Facilitate access to services offering preferential conditions for PwDs in all the Member States (22 PwDs, 23 NCAs, nine EU-level CSOs and 21 national CSOs);
- Ensure that PwDs travelling to another Member State are offered the same preferential conditions as residents of the country to which they travel to: (20 PwDs, 22 NCAs, three other relevant public authorities, 10 EU-level CSOs and 22 national CSOs);
- Improve the implementation of the EU parking card for PwDs: (22 PwDs, 21 NCAs, four other relevant public authorities, eight EU-level CSOs and 21 national CSOs).

Policy options

The majority of respondents **support the introduction of a binding EDC in all the Member States** (24 out of 24 PwDs, 18 out of 25 NCAs, and 19 out of 23 national CSOs). The majority of respondents also claimed that:

- The EDC should have both an electronic and a plastic format (12 PwDs, 16 NCAs, four other relevant public authorities, eight EU-level CSOs and 17 national CSOs).
- The holders of a national disability card or certificate should be automatically entitled to the EDC (22 PwDs, 22 NCAs and 23 national CSOs).
- Specific security features shall be added on the card (e.g., holograms, QR code, barcode, etc.) to prevent forgery and fraud of the EDC (22 NCAs, four other relevant public authorities, 10 EU-level CSOs and 21 national CSOs).
- The introduction of the EDC shall be accompanied by:
 - A common EU platform where users can get information on the preferential conditions and services offered in each Member State (22 PwDs, 22 NCAs, four other relevant public authorities, and 22 national CSOs);
 - An EU-wide awareness-raising campaign to inform relevant stakeholders about the card, its features, and benefits (21 NCAs, four other relevant public authorities, 10 EU-level CSOs and 22 national CSOs).

The majority of **PwDs and national CSOs** (15 out of 24 PwDs and 15 out of 23 national CSOs) **believe that the** eligibility criteria to receive the EU parking card and the EDC should be the same. As to the merging of the EU parking card with the new EDC, 16 **PwDs think that the two cards shall be merged, whilst** 11 NCAs and three EU-level CSOs representatives believe that the two cards shall be kept separate.

Impacts

The majority of respondents believe that the EDC would **facilitate:**

- The exercise of free movement (22 NCAs, four other relevant public authorities and 21 national CSOs);
- The right to receive preferential conditions when accessing certain services (23 NCAs, four other relevant public authorities and 21 national CSOs).

Indeed, it is expected that the EDC would increase:

- The **number of PwDs travelling in the EU** (21 NCAs, four other relevant public authorities, four EU-level CSOs and 21 national CSOs);
- The **frequency of travelling** (21 NCAs, four other relevant public authorities, four EU-level CSOs and 21 national CSOs);
- The **length of staying abroad** (15 NCAs, three other relevant public authorities, three EU-level CSOs and 22 national CSOs);
- The **number of PwDs using certain services when travelling to other Member States** (20 NCAs, 3 other relevant public authorities, three EU-level CSOs and 18 national CSOs);
- The take up by person with disabilities of cultural, leisure, sports, and travel services (23 NCAs, four other relevant public authorities, nine EU-level CSOs and 22 national CSOs).

As concerns the cost entailed by the EDC, seven out of 23 service providers highlighted that the introduction of the EDC will not bring significant change in the costs related to recruiting additional or specialised staff while eight out of 23 service providers keeping track of the number of customers with disabilities accessing preferential conditions with the EDC. However, about half of respondents (12) consider that there will be a small increase in the cost of training staff for the provision of personalised services.

Overall, the majority of service providers (18) stated that the cost of offering preferential conditions to PwDs would be relatively low. Moreover, the 23 service providers responding to the survey agreed that such costs are offset and even exceeded by the returns in terms of service providers' visibility, reputation, attracting new customers and other benefits.

As concerns the EU parking card, according to the majority of respondents, **specific security features (e.g., holograms, QR codes, barcodes, etc.) shall be added to the EU-model with the aim to tackling:**

- Frauds (13 NCAs, 3 other PAs, 15 national CSOs, six EU-level CSOs);
- Forgeries (16 NCAs, 2 other PAs, 19 national CSOs, seven EU-level CSOs).

In terms of the efficiency of the EU parking cards, although some NCAs and other public authorities claim that the EU parking card entails costs for national authorities in charge of managing and issuing the card in the Member States, 11 out of 25 NCAs and three out of 5 other PAs believe that **the benefits linked with the adoption of the EU parking card have overcome the related costs.**

To conclude, **public authorities and CSOs have divergent opinions regarding the costs of merging the EDC and the EU parking card.** More specifically, in case the two cards are merged:

- NCAs and other relevant public authorities expect:
 - A slight increase in indirect costs (i.e., the final price for the general public to use services covered by the card would be higher) (nine NCAs);
 - A decrease in costs related to the issuance of the Card (e.g., managing application procedures, producing the cards, delivering the cards, etc.) (11 NCAs and five other relevant public authorities);
 - A decrease in costs related to the monitoring (e.g., keep track of the number of cards issued) (nine NCAs) and reporting (e.g., storing information concerning the card use) its implementation (seven NCAs);
 - A decrease in enforcement costs (e.g., inspections, handling complaints, forgery controls) (4 other relevant public authorities).

Targeted interviews

The main aim was to collect further evidence on problems related to the lack of mutual recognition and the related policy options to tackle identified problems.

In overall, interviewees from all stakeholder groups confirmed the **identified problems:**

- **Lack of mutual recognition and related consequences:** according to one academic expert, two EU CSOs (out of three) and three EU bodies (out of three), national disability

cards and certificates are not always recognised when PwDs travel for short-term stays in other Member States. The non-recognition of national disability certificates hampers PwDs in accessing to preferential conditions. Consequently, according to one EU CSO (out of three) and one EU body (out of three), PwDs are discouraged to travel to other Member States for short-term stays, as they are unsure regarding whether, and what type of, preferential conditions will be available to them in the host Member State when using certain services. According to one academic expert (out of one) and one EU body (out of three), the limited access to services offering preferential conditions for non-residents with disabilities *de facto* represents an obstacle to the exercise of their free movement rights and the right to receive services in the EU.

- **Issues concerning the EU parking card:** one EU Parking association (out of two) claimed that frauds and forgeries of the EU parking card have a strong impact on the ability of PwDs to easily access different premises, as persons using fake EU parking card take away the spaces reserved for PwDs. Moreover, enforcers in charge of checking the validity of the EU parking card are not always aware of how a real EU parking card looks like, since there is no cross-national database on parking cards' design or on parking cards' holders. Hence, **the current paper copy solution is not in line anymore with the progress of technology that exposes the EU parking cards to more and more sophisticated frauds and forgeries.**

Also, interviews from all stakeholder groups confirmed the **necessity of EU action:**

- Eight (one academic expert out of one, two EU CSOs out of three, and three EU bodies out of three) out of ten interviewed considered **that the action at the EU level is necessary**, with introduction of a system of mutual recognition of disability status in the EU by means of an EU Disability Card (EDC).
- In terms of **policy options for the EDC**, there was **less support to make it mandatory for all services**, while service providers could choose the type of preferential conditions to offer. This was supported by the disability expert, and one interviewee from the EU CSOs and from the EU body.
- For **policy options on the EU parking card**, there was a call not to merge the EDC with the EU parking card by interviewees from the EU CSOs and disability expert. The two EU parking associations agreed that updating the parking card with digital components is important and area where the EU can bring added value with very concrete solutions. Finally, importance of fraud-proof EU parking card and a database solution that would link vehicle to an EU parking card was highlighted by the disability expert, and one interviewee from the EU CSOs and from the EU body.

Workshops

The workshops with CSOs (national and one EU-level CSO), NCAs and service providers intended to provide further evidence on the identified problems as well as to discuss on possible policy options and related impacts. Key findings from the workshops are aggregated and presented around the problems identified, policy options and related impacts. Results of both poll and open questions are referenced in the footnotes by reporting the number of respondents to each concerned question. The main takeaways of the break-out sessions have been discussed and validated by all the participants during the second plenary session.

Problems

Participants in the workshop (seven out of 11 CSOs and 17 out 19 NCAs) think that **differences in terms of format and features of national disability cards and certificates contribute to the limited recognition of disability status across the Member States**, particularly one CSO representative emphasised in the case of invisible disabilities. Importantly, six national service providers consulted during the study complained that they are not familiar with all national disability certificates issued above, hence they often end up not to accept them, particularly when information is provided in foreign languages.

Seven (out of nine) CSOs and 12 (out of 20) NCAs representatives think that **PwDs are discouraged from travelling abroad** as a consequence of the limited recognition of the

national disability cards or certificates across the Member States. Likewise, they think that **PwDs are discouraged from travelling abroad because they have no certainty regarding their access to preferential conditions** offered across the Member States.

Seven (out of eight) CSOs and 14 (out of 19) NCAs representatives find that **national differences in terms of design and functioning of the EU parking card hinder its mutual recognition** across the Member States. Due to the limited recognition of their EU parking card abroad, **PwDs feel discouraged from travelling abroad** (five out of six CSOs and 17 out of 20 NCAs).

Policy options

Participants in the workshops (three CSOs out of 11 and one NCA out of 29) stated that the EDC should include common security features, which would prevent fraudulent use of the card. As to the format, three CSOs (out of 11) and two NCAs representatives (out of 29) participating in the workshops argued that the EDC should be available both in digital (including a QR Code) and physical (i.e., plastic) format.

Participants argued that the introduction of the EDC should be accompanied by the establishment of an accessible and **easy-to-read EU database/website** about the (i) number of EDC released, (ii) number of persons entitled to obtain the EDC, (iii) notices about cases of fraudulent use of the EDC, (iv) number and type of service provider offering preferential conditions, (v) practical details regarding where to get and use the EDC as a resource to support the card and its effective implementation (eight CSOs out of 11 and three NCAs representatives out of 29), provided that information included in the website is verified (e.g. if the providers are indeed providing preferential conditions and in an accessible way) and frequently updated (one CSO out of 11 and one NCA representative out of 29). Moreover, according to participants the uptake and use of the EDC should be supported by an **EU-wide awareness-raising campaign** (three CSOs out of 11 and six NCAs representatives out of 29), as well as by an **EU-wide control system/authority** in charge of monitoring and coordinating the EDC implementation across the Member States (four CSOs out of 11 and six NCAs representatives out of 29).

Finally, as concerns the **EU parking card**, six out of seven CSOs and six out of 11 NCAs representatives agreed that to avoid fraud and forgery and address new ways of controlling parking rights an **update of Council Recommendation 98/376/EC** (notably its Annex I) would be necessary.

Impacts

Four CSOs out of 11 and ten NCAs representatives out of 29 strongly agreed on **the introduction of a common model EDC** that would enable its mutual recognition by public authorities and service providers across the EU. Indeed, participants in the workshops (7 out of 7 CSOs and 16 out of 16 NCAs) believe that the obligation for the Member States to **grant the same preferential conditions to all EU citizens with disabilities** will have a positive impact on the free movement of PwDs in the EU. Overall impacts would be even greater in case the **mandatory provision of preferential conditions is extended to personal assistants of PwDs** (seven out of eight CSOs and 15 out of 16 NCAs). Also, four service providers out of 20 remarked that introduction of a **common EDC will contribute to reduce costs and burdens associated with the assessment of different national disability cards in circulation**.

The totality of CSOs and NCAs representatives think that **the EU parking card should not be merged with the new EDC** (eight out of 11 CSOs and 29 out of 29 NCAs). In this regard, participants argued that having just one card, would be complicated. According to three CSOs out of 11 and one NCA out of 29, the card should be left in the car for its use as a parking card, while it could also be necessary as proof of disability to be shown to the service provider in order to get preferential conditions (e.g. in a museum). Another argument against merging the EDC and the EU parking card expressed by one CSO out of 11 and three NCAs out of 29 is the difference in eligibility criteria for those cards, as persons eligible for the parking card are not always the same as those eligible for the EDC. In case the two cards are merged, one NCA representative out of 29 mentioned that a single authority would be in charge of managing a significant increased number of persons entitled to get the card, and delivery procedures may be lengthened.

Focus group

Overall, participants highlighted that the **lack of mutual recognition of disability status in the EU generates significant administrative burdens related to the assessment of the validity of the different national disability cards.**

Yet, participating **service providers were very positive about the permanent introduction of the EDC**, stating that it would eliminate administrative barriers to mutual recognition and increase access of PwDs to services.

According to all the participants, **the EDC would reduce the additional costs and administrative burdens faced by service providers when offering preferential conditions to non-residents with disabilities.** Moreover, participants also agree that **offering preferential conditions to PwDs from other Member States would improve the reputation of their organisation.** Finally, all the participating service providers remarked the necessity to organise **EU-wide awareness-raising campaign, in all EU languages, with the aim to inform service providers and to promote the use of the EDC** across the EU.

Case studies

Representatives of public authorities, CSOs and parking associations interviewed in the context of the case studies carried out in six Member States (i.e., AT, BE, FI, FR, IT, RO) described the functioning and the main features of the parking card for PwDs in their country, including problems encountered by cardholders and potential recommendations for the improvement of the EU parking card.

Problems

Among the issues related to the use of the parking card for PwDs at national level, interviewees pointed out that **misuses of the parking card** still happen regularly, in particular frauds and forgeries. Another issue that has been reported is that there are **different parking and traffic rights granted to cardholders at local/regional level**, and lack of information about these different conditions, which often results in fines received by PwDs assuming they could use their card as they do in their municipality/region. Indeed, according to CSOs consulted during case studies the lack of information on the different rules related to the parking card and advantages granted to cardholders in the different Member States is a significant issue also at cross-border level, which often leads to uncertainty and undue fines.

Policy options

The interviewees presented some recommendations on how to improve the current use of the parking card in their country, among which:

- Improving the parking card model with digital features (e.g., hologram, QR code) to address the issues of fraud and forgery and to allow the recognition of the card by the car plates scan or at the park meter.
- Establishing national databases of parking card holders to be able to check the validity of the cards and making them interoperable at EU-level to facilitate cross-border checks.
- Establishing an EU-wide, uniformly accessible website where PwDs can find out about the rights associated with their parking card in each Member State.

Finally, there was unanimity among the interviewees in the fact that it should not be merged with the current parking card, as the scope of the two instruments is too diverse. Only one parking association representative interviewed was in favour of unifying the European Disability Card with the parking card if a common database of card holders will be accessible for parking rights controllers.

Summary overview of results for key IA elements

- **Problems:** There was clear consensus amongst all stakeholders (i.e PwDs, EU level stakeholders, national authorities, CSOs, service providers) consulted through different consultation activities (i.e. online survey, public consultation, targeted interviews, workshops) that national disability cards are not always accepted when persons with disabilities travel across Member States. Particularly, participants in the workshops with NCAs

and services providers highlighted that, differences in terms of format and features of national disability cards and certificates contribute to the limited recognition of disability status across the Member States. Similarly, consulted stakeholders through online survey, public consultation, targeted interviews, workshops and case studies agreed that national differences in terms of design and functioning of the EU parking card hinder its mutual recognition across the Member States. A large number of respondents to the online survey, public consultation and the workshops agreed that the limited acceptance of national disability card/EU parking card discourage persons with disabilities from travelling abroad in turn hindering the exercise of their free movement rights.

- **EU added value:** The perception of the need for EU action and the EU added value was positive overall among the range of stakeholders consulted. Particularly, respondents to the online survey from all the consulted categories (i.e. PwDs, NCA, CSOs and service providers) agreed that EU intervention would have particularly added value compared to what individual countries could do towards facilitating mutual recognition of disability status among Member States. Moreover, respondents to the public consultation across all categories largely agreed that an EU intervention would be necessary to facilitate access to services offering preferential conditions for PwDs in all the Member State and improving the implementation of EU parking card across the EU.
- **Options:** The different categories of stakeholders consulted across all consultation activities largely agreed on the introduction of an EDC that is binding in all Member States. However, there are divergent views among consulted stakeholders as concerns the merging of the EDC with EU parking card. The majority of respondents, from all stakeholder categories responding to the public consultation agreed that EDC shall be merged with the EU parking card. However, most of the different stakeholders (i.e. CSO, NCAs, service providers) consulted across different consultation activities (online survey, targeted interviews, workshops) stated that the EDC and the EU parking card shall be kept separate.
- **Impacts:** CSOs and NCAs responding to the online survey and participating in the workshops largely agreed that participants in the workshops that introduction of a binding EDC that oblige Member States to grant the same preferential conditions to all EU citizens with disabilities will have a positive impact on the free movement of PwDs. Importantly, the different categories of stakeholders consulted through the public consultation largely agreed that the introduction of the European Disability Card would have no impact on regulatory charges. Finally, all service providers responding to the online survey agreed that the costs of implementing the EDC are offset and even exceeded by the returns in terms of service provider's visibility, reputation, attracting new customers and other benefits.

Annex II – Who is affected and how?

Practical Implications of the Initiative

The practical implications and key obligations to implement the initiative for both NCAs and service providers are indicated in Table below, how these translate into costs is detailed in section 1.2; how the initiative would impact small and medium enterprises is in Section 1.4.

Table 26 - Type of actions undertaken by NCA and service providers

Actions	NCA	Service providers
Management of the application process	x	
Production of the card	x	
Delivery of the card	x	
Establishment of the website	x	
Providing benefits to non-residents with disabilities		x

Source: Author's elaboration

Summary of costs and benefits

The Tables below provide a detailed assessment of the benefits and the costs of the preferred policy options A2 (the introduction of the EU Disability Card in all MS on a mandatory basis for all services in the internal market offering preferential conditions to nationals with disabilities) with option B2 (an EU legislative act to provide for the mutual recognition of EU parking cards) identified following the comparison of the policy options in section 7 and 8 of the final report, and described more in detail in section 9. Benefits and costs are quantified whenever possible, and when this is not possible, a qualitative justification and an explanation is provided. Furthermore, and in line with the approach of a Cost-Effectiveness Analysis, benefits are provided in monetary terms only when this is appropriate given the nature of the benefit being assessed.

Summary of costs and benefits of policy option A2

Table 27 – Overview of Benefits (total for all provisions) – Preferred Option A2 and B2

Description	Amount	Comments
Direct benefits		
<i>Improved welfare</i> - Increase in individual and societal welfare Enhanced participation in short term travels of persons with disabilities	Reduction of the travel gap for PWDs of between 2.8 and 4.12 percentage points	The reduced uncertainty regarding the recognition of disability status and the subsequent provision of preferential conditions and personalised services to persons with disabilities travelling for short-term stays is expected to lead to an increase in both the share and number of persons with disabilities travelling in the EU. While the exact increase cannot be quantified, it was estimated 276, based on existing data on persons with disabilities ²⁷⁷ and the evolution of travel patterns in the general population. This will in turn have a positive societal impact through improvements in the culture, social integration and personal development of persons with disabilities.
<i>Improved market efficiency</i> – Cost savings for persons with disabilities travelling	Ranging between EUR 30 and EUR 120 in total for persons with disabilities travelling for stays of about 4 days, between EUR 100 and 400 in total for persons	Cost savings for persons with disabilities currently being denied preferential conditions when travelling to other MS (or not travelling abroad), estimated at about 44% according to the results of the Public Consultations. These costs savings were identified through case studies of individual

²⁷⁶ See Annex III Calculation of the travel gap for a detailed overview of the procedure in calculating the travel gap

²⁷⁷ Eurostat database, tour_dem_toage. Available at: [link](#).

Description	Amount	Comments
	with disabilities travelling for about 2 months	traveller's journeys. These were elaborated as the potential direct monetary savings coming from the preferential conditions already provided by service providers, across different travel scenarios. The process leading to the elaboration of the journeys and the sources used are detailed in Section 3.2.2 of Annex III.
<i>Improved market efficiency – Cost savings and general reduction in hassle costs for persons with disabilities and service providers</i>	n.a.	By reducing the difficulty and the time cost for service providers to check the different national disability cards, the EDC would increase efficiency also on the side of service providers.
<i>Improved market efficiency – Improved information on the preferential conditions offered to persons with disabilities</i>	n.a.	Option A2 entails enhanced provision of information to persons with disabilities on the types of preferential conditions offered to them, through the set-up of national websites and the use of awareness raising campaigns (foreseen as non-legislative flanking measures). The increased awareness on the preferential conditions available and on the benefits offered by the EDC would improve efficiency in the sector of tourism of persons with disabilities, by allowing them to plan short term stays with more information at their disposal.
Indirect benefits		
<i>Wider macroeconomic benefits – Benefits in the market for accessible tourism</i>	Value added in the market for accessible tourism: the estimates range from 2.1 to 3.1 billion EUR	The increased participation in tourism of persons with disabilities resulting from option A2 would have positive indirect benefits in the market for accessible tourism, whose total turnover would increase as a result of the policy. Estimates of the total output of this sector in 2012 put the total value added of the sector to the EU economy at about 62 billion EUR in 2012, with an indirect multiplier of 1.84. Considering the presence of a travel gap, i.e. a difference in travelling propensity between the general population and persons with disability, estimated at around 6% in the EU, a complete closure of the gap, which would imply 2 million more persons with disabilities travelling in the EU, would entail an increase of EUR 3.72 billion in total value added of the sector (4.5 if adjusted for inflation in 2023). This can be used as an upper bound: the actual gain is likely to be at a level significantly below this threshold, as uncertainty regarding preferential conditions is not the only driver of the travel gap between persons with disabilities and the general population. ²⁷⁸

²⁷⁸ Economic Impact and Travel Patterns of Accessible Tourism in Europe - Full Report, 08/03/2015. Directorate-General for Enterprise and Industry, now known as Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs (DG GROW), European Commission. Available at: [link](#). Estimates on the economic contribution of accessible tourism to the EU economy are included in Section 6 of the report.

Description	Amount	Comments
Other non-monetary benefits – Protection of fundamental rights	n.a.	<ul style="list-style-type: none"> • Freedom of movement: the removal of barriers linked to the lack of mutual recognition of disability status across Member States would encourage persons with disabilities to travel, facilitating free movement. • Integration of persons with disabilities: increased participation in tourism of persons with disabilities would contribute to ensuring a deeper integration in European society. • Non-discrimination: the removal of uncertainty surrounding the recognition of disability status abroad and subsequent access to preferential conditions would help ensure equal access to services for persons with disabilities and avoid any potential for discrimination due to only nationals being able to access these conditions in their Member State. • Respects of elderly rights (art. 25 ECFR): the certainty of having access to preferential conditions when using certain services abroad would facilitate the travelling of the elderlies across the EU as they will be granted with the same assistance and support provided to elderlies with disabilities in the host Member States. • Access to service of general economic interest (art. 36 ECFR): the mandatory provisions of preferential conditions for using certain services abroad would contribute towards the social and territorial cohesion of the Union as EU citizens with disabilities would be incentivised to travel across the Member States. • Freedom to conduct a business (art. 16 ECFR): in accordance with Union law and national laws and practices: the EDC would not oblige service providers not offering any preferential conditions to persons with disabilities to do that, hence the freedom to conduct a business as established by Article 16 is recognised.

Source: Author's elaboration

Table 28 – Overview of costs – Preferred option A2

Description		Amount		Stakeholders	Comment
Activity	Type of cost	One-off	Recurrent		
Production and delivery of EDCs	Direct adjustment costs	n.a.	Between EUR 1 and EUR 5 per Card. Cost are likely to decrease as	Public authorities	The costs of production and delivery can be estimated based on those incurred by Member States participating in the

Description		Amount		Stakeholders	Comment
Activity	Type of cost	One-off	Recurrent		
			production is scaled up		pilot project. ²⁷⁹ These costs are included here as fixed costs, but they are likely to significantly decrease once production is scaled up as the number of EDCs increases.
Establishment of an IT system for the digital EDC		1.67 million EUR for the whole EU	n.a.	Public authorities	
Maintenance of an IT system for the digital EDC		n.a.	249,757 EUR per year for the whole EU	Public authorities	
Provision of preferential conditions to persons with disabilities from other Member States	Direct adjustment cost	n.a.	In the transport sector, the total yearly costs in the transport sector are estimated to range between 116 and 161 million EUR, accounting for only 0.05% to 0.08% of the turnover of (non-air) passenger transport	Service providers	The majority of respondents in the targeted survey on costs for service providers reported a small cost of offering preferential conditions. Moreover, service providers indicated that persons with disabilities from other Member States represent a very small portion of their client base ²⁸⁰ For the transport sector, where the most significant preferential conditions are found and being closely related to short term stays, costs are estimated as having to offer preferential

²⁷⁹ European Commission, Directorate-General for Employment, Social Affairs and Inclusion, Chiattelli, C., Abbasciano, C., Schizzerotto, A., et al., (2021), Study assessing the implementation of the pilot action on the EU Disability Card and associated benefits: final report. Table 30. Available at: [link](#). Data on costs in the study on the Pilot action were obtained following desk research and consultation with the DCNOs.

²⁸⁰ Survey on costs targeted at service providers, Q8 – Can you please estimate, on a monthly basis on average, what share of your customers is represented by customers with disabilities from other EU Member States, travelling for short-term stays (less than 3 months)? Q38 - In a month, can you estimate the average cost per person of offering preferential conditions to customers with disabilities? Please consider costs of offering discounted prices (which would be equivalent to the average amount of the discount), personalised services (e.g. guided tours, personal assistance, priority lines) and any other costs which you incur for each customer with disabilities (See Annex III).

Description		Amount		Stakeholders	Comment
Activity	Type of cost	One-off	Recurrent		
					conditions to the 44% of PwD who has reported ever being denied preferential conditions when travelling abroad. The actual costs are likely closer to the lower bound, due to the overlap with the elderly population.

Source: Author's elaboration

Summary of costs and benefits of policy option B2

Table 29 – Overview of Benefits (total for all provisions) – Preferred Option B2

Description	Amount	Comments
Direct benefits		
<i>Improved welfare</i> – Increase in societal welfare due to enhanced participation in tourism of persons with disabilities	Reduction of travel gap for PwDs between 0.27 and 0.4 percentage points	The reduced uncertainty regarding the full recognition of EU parking cards for cardholders travelling to other Member States, resulting from option B2, is expected to lead to an increase in the number of persons with disabilities travelling in the EU. While the exact increase cannot be quantified, it is likely to be small as parking card holders are a portion of the total population of persons with disabilities, and travelling by car is one of the possible means of transport used by persons participating in tourism. Nevertheless, increased participation in tourism would have positive consequences in terms of increased personal development, social inclusion and culture for the cardholders involved.
<i>Improved market efficiency</i> – Cost savings for persons with disabilities travelling	Starting from 4 EUR per day ²⁸¹	Option B2 would increase certainty regarding the recognition of EU parking cards for persons with disabilities travelling abroad. As a consequence, cardholders who may have previously sought for different parking solutions, for fear their parking card may not be recognised, would now be more likely to rely on parking slots reserved to them. These potential savings are quantified based on the average cost of parking in the EU, estimated in 2013 by the European Parking Association. The average cost of parking spots for the general public use was instead estimated at EUR 800 per space, per year. Adjusted per inflation and per day (instead of per year), this cost is estimated to be roughly 4 euro per day, which is certainly a lower bound as shorter periods tend to be more expensive. Other estimates calculating the average price of parking in 32 European cities have put the number at about EUR 3 per hour.
<i>Improved market efficiency</i> – Improved information on the parking rights of cardholders	Savings can be quantified as generally below EUR 300 in terms	Option B2 entails enhanced provision of information on how the EU parking card works and the scope of the rights associated with the EU parking card. Increased knowledge on these aspects may reduce improper use of the Card and, subsequently, fines (in SOLVIT, several complaints on the parking card concerned fines received by cardholders who believed that the rights granted by the EU parking

²⁸¹ European Parking Association (EPA, 2013), The Scope of Parking in Europe. Available at: [link](#). The aggregate estimates provided refer to the following set of countries: AT, BE, HR, DK, EE, FI, FR, DE, HU, IE, IT, LU, NL, NO, PL, RS, SK, ES, SE, CH, UK.

Description	Amount	Comments
	of avoided parking fines across the EU ²⁸²	card when travelling to other Member States were the same as those granted in their country of origin).
Indirect benefits		
<i>Wider macroeconomic benefits</i> – Benefits in the market for accessible tourism	Value added in the market for accessible tourism: range from 0.2 billion EUR to 0.3 billion EUR	Similarly, to policy option A2, option B2 is expected to have indirect impacts on the market for tourism through an increased number of persons with disabilities travelling. The total magnitude of this indirect impact is, however, expected to be small due to the smaller number of cardholders compared to the wider population of persons with disabilities.
<i>Other non-monetary benefits</i> – Protection of fundamental rights	n.a.	<ul style="list-style-type: none"> • Freedom of movement: the removal of barriers linked to the lack of mutual recognition of EU parking cards across Member States would encourage persons with disabilities to travel, facilitating free movement. • Integration of persons with disabilities: increased participation in tourism of persons with disabilities would contribute to ensuring a deeper integration in European society. • Non-discrimination: the removal of uncertainty surrounding the recognition of EU parking card would help ensure equal access to services for persons with disabilities and avoid any potential for discrimination due to only nationals being able to access these conditions.

Source: Author's elaboration

Table 30 – Overview of costs – Preferred option B2

Activity	Type of cost	One-off cost	Recurrent	Stakeholders	Comment
Update of security features	Direct adjustment costs	n.a.	Negligible	Public authorities	These costs include the costs of updating security features only for the Member States who have not yet done so and would have to comply with the new legislation.
Set-up of national database of cardholders	Direct adjustment costs	n.a.	Negligible	Public authorities	
Set-up of websites with information on the parking card	Direct adjustment costs	Negligible	Negligible	Public authorities	As Member States already have an EU parking card website, the only costs are associated with updating the information

Source: Author's elaboration

²⁸² Fine range between EUR 60 and 300 in Spain, EUR 40 and 80 in Greece, EUR 30 and 250 in Portugal and EUR 36 and 144 in Italy. In Germany, the violation of parking rules can result in fines ranging from EUR 35 to EUR 110 (estimated by a large provider of car rental services).

Relevant Sustainable Development Goals

Table 31 – Overview of relevant Sustainable Development Goals – Preferred Option

Relevant SDG	Expected progress towards the Goal	Comments
<p>Goal 8 – Decent work and economic growth. Target 8.9: devise and implement policies to promote sustainable tourism that creates jobs and promotes local culture and products.</p>	<p>Both policy options A2 and B2 are expected to bring about an increase in tourism participation of persons with disabilities, through a reduction in the travel gap between the general population and persons with disabilities. As a consequence, the travel propensity of persons with disabilities can be expected to range between 70 and 75% by 2030 as a result of the measures. This would also have a positive impact on the total turnover of the market for accessible tourism.</p>	<p>The evolution of travel patterns over the next 10-15 years is uncertain given increasing pressure to deal with the climate emergency. In any case, the travel propensity of persons with disability is not expected to diverge from that of the general population (which has been growing over the past 10 years) and both policy options A2 and B2 are expected to help close the travel gap with the general population regardless of the overall trend.</p>
<p>Goal 10 – Reduced inequality. Target 10.2: empower and promote the social, economic and political inclusion of all, irrespective of age, sex, disability, race, ethnicity, origin, religion or economic or other status. Target 10.3: ensure equal opportunity and reduce inequalities of outcome, including by eliminating discriminatory laws, policies and practices and promoting appropriate legislation, policies and action in this regard.</p>	<p>Policy option A2 would encourage the social and economic inclusion of persons with disabilities by improving their participation in tourism across the EU. On the one hand, the policy option would consist in direct monetary savings for persons with disability, which would reduce their costs when travelling to other member states. This is expected to reduce inequality, as persons with disability are overly represented in the lowest income brackets. Moreover, the reduction in uncertainty is expected to further increase their economic and social integration, as uncertainty can be a driver of poor economic decisions.</p>	<p>The option would achieve this progress by removing some of the financial barriers discouraging persons with disabilities from travelling (by reducing uncertainty regarding the provision of preferential conditions, many of which are of a financial nature), in a context where persons with disabilities have reported that their decision not to travel is deeply influenced by financial concerns.¹¹ Part of the cost of this measure would fall onto service providers, in particular in those sectors where preferential conditions to persons with disability are more present (e.g., transport, culture, leisure). However, these costs are estimated to be relatively minor, as: i) persons with disability are a relatively small share of the population and with lower travel propensity, ii) many (e.g., the elderly) already enjoy preferential conditions even if their disability card is not recognised, iii) the cost for service providers is expected to partly offset by paying customers travelling with persons with disability and by the savings in terms of time/human resources in having to check the different national cards.</p>
<p>Goal 11 – Sustainable cities and communities. Target 11.2: provide access to safe, affordable, accessible and sustainable transport systems for all, improving road safety, notably by expanding public transport, with</p>	<p>By ensuring the provision of preferential conditions in internal market services, including transport, for persons with disabilities travelling to other Member States for short-term stays, option A2 would contribute to improving access to affordable transport for this group of citizens. Access to affordable and accessible transport would also be improved by</p>	<p>An estimate of the costs for transport service providers are outlined in the report in Annex III. The costs are expected to vary across countries, and estimate range from a few million to more than 100 million EUR for some countries. The uncertainty in the actual value is due to absence of data on the proportion of persons</p>

Relevant SDG	Expected progress towards the Goal	Comments
special attention to the needs of those in vulnerable situations, women, children, persons with disabilities and older person.	the full recognition of national parking cards for cardholders travelling abroad by car, a consequence of policy option B2. By giving easier access to preferential conditions in public transport, policy option A2 would also partly redirect some travel towards more sustainable means of transportation.	with disability who currently benefit from preferential conditions. As explained above, these costs are expected to be partly offset by a higher number of paying customers and by time savings in checking the cards.
Goal 6 – Peace, justice and strong institutions. Target 16b: promote and enforce non-discriminatory laws and policies for sustainable development.	Option A2 would remove the potential discrimination associated to the offer of preferential conditions only to national residents with disabilities, by mandating service providers offering preferential conditions in the EU to also offer them to persons with disabilities from other Member States.	The policy option would also allow to monitor more easily the enforcement than the status quo, where it is difficult to keep track of what preferential conditions are offered to travelling persons with disabilities.

Source: Author's elaboration

SMEs test

Table 32 – SMEs test

Steps	Description	Notes
(1) Identification of affected businesses	<p>The initiative targets all service providers (public and private firms) offering preferential conditions to persons with disabilities, in all internal market services, covered by the preferred option A2 and the parking sector covered by the preferred option B2.</p> <p>While SMEs are represented in these categories, they are not specifically targeted by the initiative. SMEs are likely to be over-represented in some sectors in scope (e.g. leisure, culture, tourism services) than in others, where preferential conditions are provided primarily by large public providers (as in the transport sector). The precise share of SMEs is not possible to assess given the fact that systematic data is not collected by the Member States regarding the offer of preferential conditions. While in some sectors preferential conditions are mandated by law, in most they are the voluntary decision of service providers.</p> <p>SMEs are going to be impacted directly and indirectly by the initiative, generating several benefits and some costs. Costs are not expected to be proportionally more substantial than for large firms.</p>	See Annex V, Section 2 for a mapping of services providing preferential conditions in the EU
(2) Consultation of SME stakeholders	<p>SME's representatives have been consulted in several of the data collection conducted as part of the Study.</p> <p>17 of the 23 service providers who responded to the targeted survey focused on costs are SMEs – 7 Micro, 5 Small, and 5 Medium. 15 of them offer preferential conditions to persons with disabilities from other Member States, the vast majority on a voluntary basis. There was a consensus on the fact that extending preferential conditions to persons with disabilities from other Member States did not result on an overall negative impact (benefits minus costs), expressed by both SMEs and large service providers. Actually, almost half of experienced positive returns from it.</p> <p>Likewise, there were several SMEs and two representatives of Business Europe among the participants in the</p>	See Annex 1 for the description of the stakeholders contacted, methodology and results of consultations methods

Steps	Description	Notes
	workshop ²⁸³ conducted with service providers. The findings of the survey were confirmed during the workshop. The initiative is expected to simplify the process of verifying proofs of disability and as a result bring cost savings.	
(3) Assessment of the impact on SMEs	<p>SMEs may experience some positive returns deriving from the small positive economic impacts of the policy in the field of accessible tourism given that many SMEs operate in the tourism sector. According to the World Tourism Organisation, the wide majority of accommodation establishment in the EU tourism sector in 2016 were in the hands of SMEs.²⁸⁴</p> <p>Furthermore, as clearly evidence by the survey, SMEs and large firms alike experienced or expect that the benefits of providing preferential conditions to persons with disabilities from other Member States to at a minimum offset fully the small increase in costs (e.g. cost of service, training personnel, administrative costs, reporting costs etc.). Persons with disabilities travelling from other Member States were estimated to be a very small share of their overall customers (the modal response being less than 1%)</p>	See Sections 7.2.6, 7.3.6, and 7.4.6 on the expected economic impacts of the retained policy options; and Section 8.2 on the efficiency of the retained policy options and section 9 on the description of the preferred policy options
(4) Minimising negative impacts on SMEs	SME competitiveness is not expected to be significantly impacted relative to other business.	

Source: Author's elaboration

Annex III – Analytical Methods

Introduction

The assessment of the policy options in Section 7 of the final report requires the choice of analytical methods to evaluate the effects of each policy option (in relation to the specific objectives identified) and their general impacts. In this context, the Study Team applied a Multi-Criteria Decision Analysis to assess the different policy options (including the baseline, policy options EDC: A1 and A2, and policy options PARK: B1 and B2). The method is described in detail in the next sub-sections.

Annex III outlines the analytical methods that have been used as part of the impact assessment.

- The Multi Criteria Decision Analysis (MCDA), Tool #62 of the BRT. The Multi-Criteria Decision Analysis (MCDA) is a tool for the qualitative analysis and comparison of a complex set of alternatives concerning the extent to which various measures achieve their objectives, are efficient, coherent etc. The MCDA is based on qualitative ratings and rankings with quantitative data supporting the assessment.
- The Cost-Effectiveness Analysis (CEA). The CEA draws upon monetised data on costs (e.g. in EUR) and compares them with quantitative or qualitative information on benefits. It is used in case monetised information on benefits is not available or ambiguous, if monetisation is not reasonably possible or the nature of benefits is qualitative by definition (e.g. perceptions or attitudes). It is used to decide upon resource allocations between different measures. The information that feeds into the CEA is:

²⁸³ Respondents to the online workshop with service providers held on 11 May 2023.

²⁸⁴ World Tourism Organization (UNWTO, Madrid, 2018), European Union Tourism Trends: "EU destinations counted 608 thousand accommodation establishments in 2016, mostly small and medium-sized enterprises (SMEs)". Available at: [link](#).

- *Individual travellers' journeys*: these are obtained by estimating fictitious journeys of 4 days or 2 months in selected destinations, and researching what are the preferential conditions available to PwD (whether travelling with or without personal assistants). These are then aggregated up to potential savings per day and over the trip.
- *Calculation of the travel gap*: outlines how the travel gap for person with disability with respect to the general population is calculated, by using data from the report for DG Grow. This is the only data that allows to calculate participation in tourism for the relevant population, although some assumptions are required, as outlined in the annex.
- Estimation of impact of the policy options on the travel gap of persons with disabilities and value added to the market of accessible tourism
 - *Detailed assessment of costs for the transport sector*: detailed data on preferential conditions in the transport sector is obtained for 10 countries, and a lower and upper bound of the costs of offering preferential conditions to persons with disability from other Member States is obtained. The lower bound is estimated assuming all persons with disability already travelling already benefit from preferential conditions. On the contrary, the upper bound is obtained assuming no preferential conditions are offered to non-residents from other member states.
- *Final ranking matrix*. In this matrix, the sums of the weights for all criteria in relation to which a given policy option performs better than other policy options are indicated. As the preferred policy options always dominate the other across all dimensions (they are either equal or superior), no weighting scheme is discussed as this would lead to the same preferred policy options.

Multi-Criteria Decision Analysis (MCDA)

The Multi-Criteria Decision Analysis (MCDA) is a **tool for the qualitative analysis and comparison of a complex set of alternatives** concerning the extent to which various measures achieve their objectives, are efficient, coherent etc. The MCDA is based on qualitative ratings and rankings with quantitative data supporting the assessment.

Clearly, for the MCDA to take place efficiently, the policy alternatives need to be sufficiently detailed (e.g. including comprehensive sub-options) and understood in order to have a comprehensive view for the assessment in relation to the evaluation criteria. The listing and description of such policy options is carried out in Section 6 of the Final report. Furthermore, the assessment vis-à-vis the criteria needs to be sufficiently detailed in order to provide distinct ratings for each of the elements of the alternative measures.

The MCDA is a qualitative tool, and thus always subject to scrutiny concerning the implicit and explicit judgments made during the assessment process. Therefore, it is **crucial for the application of the MCDA to be transparent** about the data used and the sources, as well as how specific data have fed into and shaped the analysis. In the Final report, the assumptions made to provide a certain rating and the data sources employed are always made clear and referenced.

In Section 7 of the Final report, each policy option is analysed and scored relative to the baseline scenario against the assessment criteria provided in Table 1 below. The baseline scenario is, by definition, rated with "0" in relation to each of the criteria. The other policy options, on the other hand, are scored on a scale from 1 to 3 in terms of their positive impacts, where 1 represents a very small positive impact and 3 a very large positive impact compared to the baseline. In the same vein, -1 represents a very small negative impact and -3 a very large negative impact, again using the baseline as a benchmark. A score of "0" means that the option would not constitute a significant deviation from the baseline scenario, with which it would share the impacts. The scores help distinguish the relative strengths of the option in light of the different criteria considered. In the Final report, in the Tables of Section 7, such scores are always accompanied by a detailed assessment of the rationale behind the rating assigned, and a breakdown of the different types of effects and impacts, each with its own magnitude. Table below is an illustrative assessment table, which was used as a model for the MCDA in Sections 7 and 8.

Table 33 – Illustrative assessment table for the Policy Options

Criteria	Rate	Summary of assessment
Evaluation of effects		
<i>Effectiveness</i>	0/3	Description of the extent to which the policy option can be expected to achieve the identified policy objectives
<i>Efficiency</i>	0/3	Description of the costs of the initiative and its ability to efficiently mobilise resources for the achievement of the identified policy objectives
<i>Coherence</i>	0/3	Consistency assessment of the provisions proposed by the policy option with objectives of the intervention and EU objectives in other relevant policy areas
<i>Subsidiarity and proportionality</i>	0/3	Description of whether the policy option is appropriate and does not go beyond what is necessary to address the problem satisfactorily
Types of impacts		
Social impacts	0/3	<p>Description of the likely social impacts. These may include changes in relation to:</p> <ul style="list-style-type: none"> • Impact on the mobility of persons with disabilities and their assistants across the EU both on the extensive margin (increase in the number of people who travel) and the intensive margin (the frequency of travels, change in the choice of destination countries); • Participation in cultural, leisure and sports manifestations and access to such resources of persons with disabilities and their assistants, especially across the EU; • Cross-border provision of services; • Member States competent authorities' ability to cooperate, coordinate and exchange good practices; • Communication and collaboration with civil society organisations and with service providers offering benefits and special conditions and available benefits to other Member States; • Service providers' cross-country communication and collaboration: share good practice relating to disability, joints services etc.
Economic impacts	0/3	<p>Description of the likely economic impacts. These may include changes in relation to:</p> <ul style="list-style-type: none"> • Functioning of the internal market; • Non-discriminatory cross-border provision and access to goods and services; • Administrative burden on businesses, especially SMEs, including simplification potentials; • Changes in revenues for services providers, in particular revenues from changes in the number of users paying for their goods and services (especially for what concerns potential disproportionate impacts on SMEs); • Changes in prices of goods and services (e.g. increases in prices in response to higher costs of offering free or discounted services to Cardholders); • Changes in purchasing power of Cardholders given that they experience a reduction in their costs of travelling across the EU; • Administrative costs on public authorities, possible need of restructuring or create of new public authorities dedicated to the Cards, including also costs to prevent fraudulent use of the Card.
Digital impacts	0/3	<p>Description of the likely digital impacts. These may include changes in relation to:</p> <ul style="list-style-type: none"> • Digitalisation of the EU Parking Card (from paper format to digital formats as SIMON) that may influence the recognition of benefits; the monitoring of the use of the card at national and EU level, Card take-up by removing the need to request a new Card upon expiration, fraudulent use of the Card;

Criteria	Rate	Summary of assessment
		<ul style="list-style-type: none"> • Mobile applications and websites dedicated to the Card and its benefits; • Digitalisation of national registries on persons with disabilities: application, security, maintenance and updating of databases; • Digital skills of persons with disabilities (e.g. developing better digital skills may facilitate being informed on the availability of benefits both at national and EU level); • Digitalisation of benefits provided by service providers (e.g. common EU platform where the list of service providers and available benefits can be consulted); • Accessibility regarding the use of the card for age classes and social backgrounds, depending on digital skills/availability of digital devices.
Environmental	0/3	<p>Description of the likely environmental impacts. These may include changes in relation to:</p> <ul style="list-style-type: none"> • Mobility (of both persons with disabilities and accompanying persons); • Share of transport through public or private transport; • Increase in the use of transport of persons with disabilities, both personal vehicles (especially in response to the Parking Card) and other means for travel across the EU.
Fundamental rights	0/3	<p>Description of the likely impacts on fundamental rights. These may include changes in relation to:</p> <ul style="list-style-type: none"> • Personal integrity and privacy; • Equal opportunities; • Data protection; • Participation in culture; • Environmental and consumer protection; • Good administration; • Human dignity; • Non-discrimination; • Integration of persons with disabilities; • Freedom of movement.
Competitiveness and SMEs	0/3	<p>Description of the likely impacts on competitiveness and SMEs. These may include changes in competitiveness in the internal market or any disparate impact of the policy options on SMEs.</p>

Source: Authors' own elaboration

Cost-Effectiveness Analysis (CEA)

The efficiency of the policy options considered, i.e. the evaluation and comparison of the costs and benefits of each measure, was not carried out through a standard Cost-Benefit Analysis (CBA). Many of the benefits of the policy options would indeed be complex to monetise, and monetisation itself would often require unrealistic assumptions. In such cases, in line with the Better regulation Toolbox, a different type of efficiency evaluation is more appropriate: the **Cost-Effectiveness Analysis (CEA)**. The CEA **draws upon monetised data on costs** (e.g. in EUR) and **compares them with quantitative or qualitative information on benefits**. It is used in case monetised information on benefits is not available or ambiguous, if monetisation is not reasonably possible or the nature of benefits is qualitative by definition (e.g. perceptions or attitudes). It is used to decide upon resource allocations between different measures.

The CEA draws upon monetised information concerning costs, as well as quantitative and/or qualitative information on benefits, e.g. the extent to which a given policy option effectively and efficiently is expected to achieve the policy objectives. The CEA typically uses both primary and secondary data. Depending on the subject matter, all three types of information listed above can be primary and/or secondary data.

Regarding **information on costs** of the policy option, in some cases the absence of readily available data on costs was remedied through a stakeholders consultation strategy (explained in detail in Annex I) and the application of some assumptions. To identify cost savings for persons with disabilities of policy option A2, the Study Team elaborated case studies of individual persons with disabilities travelling in the EU and facing different costs in the case of the baseline *and* in the presence of a European Disability Card. Such an exercise in data collection is explained more

in Subsection 3.2.1. Finally, regarding the estimations of the travel gap provided in the impact assessment (and also applied in Section 3.5. on the persistence of the problem) Subsection 3.2.2 provides an explanation of how they were obtained.

Individual traveller’s journeys to identify cost savings

In the context of policy option A2, the mutual recognition of disability status for persons with disabilities travelling for short-term stays would effectively reduce uncertainty regarding the offer of preferential conditions. These would result in cost savings for persons with disabilities travelling to other Member States, allowing them to enjoy preferential conditions on an equal basis with respect to national residents. To quantify this important information, the Study Team estimated the possible savings potential for persons with disabilities under different travel scenarios. The scenarios involved hypothetical journeys in three different countries (specifically, two large capital cities in Ireland and Hungary, one medium-sized city in Italy), for two different lengths (4 days or 2 months). The choice of Member States was based on the provision of preferential conditions analysed in Table 5 of Section 3.2.2 of the Final Report so as to be representative, with one country providing several preferential conditions across sectors, one providing an average amount of preferential conditions and one providing only few preferential conditions. For short-term stays, the presence or not of a personal assistant was also evaluated. This makes for a total of 9 estimated travel journeys (and potential savings for persons with disabilities). While the results of the estimation exercise are to be considered as suggestive of the potential cost savings for persons with disabilities, they do offer a practical example with the potential to highlight the important savings that this category of stakeholders would have as a result of the policy. Table below maps the different traveller’s journeys analysed.

Table 34– Types of Travel Journeys Estimated

Type of Travel Journey	Country	Short Term (4 Days)	Medium Term (2 Months)
Large Capital City	Ireland (many preferential conditions)	4 days trip to Dublin without personal assistant	2 months stay in Dublin without personal assistant
		4 days trip to Dublin with personal assistant	
Large Capital City	Hungary (few preferential conditions)	4 days trip to Budapest without personal assistant	2 months stay in Budapest without personal assistant
		4 days trip to Budapest with personal assistant	
Medium Size City	Italy (average amount of preferential conditions)	4 days trip to Bergamo without personal assistant	2 months stay in Bergamo without personal assistant
		4 days trip to Bergamo with personal assistant	

Source: Authors’ own elaboration

In the estimations, potential savings related to international travel are excluded. The assumption is that international travel is mostly purchased in the home country, and, as such, the problem of mutual recognition of disability status does not apply. Even if the ticket is purchased with a foreign provider operating nationally, given they operate in the country, the assumption is that they recognise the national disability card for travel to and from that country. If this is not the case, then we would not consider some preferential conditions that a person with a disability would get access to with the EDC, and our savings estimate have to be understood as a lower bound of the actual savings. The focus is rather on the real, monetary savings for reduced tickets/fares applied to persons with disabilities when having already travelled in the country of interest. Furthermore, in the exercise preferential conditions that are non-monetary in nature, such as, for example, a surrogate driver when renting a car, are also not considered, while emphasis is given to the direct economic benefits that can be estimated and gathered through desk research. If, for a specific service, there appears to be no explicit mention of a reduced

price/monetary preferential condition for a person with disabilities, the assumption made is of a lack of this kind of preferential conditions. With this in mind, estimates in the exercise hinge on the side of caution, and are probably a lower bound of real potential savings from preferential conditions for persons with disability. To gauge the magnitude of these savings, we also compare these estimates to the average spending of persons with disabilities in 2012 for overnight stays (EUR 102 in 2012, EUR 122 adjusted for inflation today)²⁸⁵. Although the two numbers are not directly comparable, this is the best estimate available to which we can compare these savings to obtain an idea of how large potential savings are with respect to how much persons with disability spend when travelling in the EU.

The Study Team's estimated travel journeys span three countries: Ireland, Italy and Hungary, which differ across preferential conditions, general living standards and cost of living, and general touristic attractions. In each country, the estimated travel journey begins and ends at the airport (or train station) close to the location of interest. For Ireland and Bulgaria, we focused our estimation on the capital cities, Dublin and Budapest, while for Italy we focused on a medium size city, Bergamo. For short stays, we estimate savings for persons with disabilities over a period of 4 days, consisting of the following activities: 1 visit to a museum, 1 event at a theatre, 1 event at a cinema, 1 day trip by train/ferry, as well as transport to and from restaurants and accommodation. For medium term stays of two months, savings for persons with disabilities are estimated over a period of 4 days, consisting of the following activities: 5 visits to museums, 1 day trip by train, 1 theatre, 3 cinema, 1 amusement park, as well as transport to and from, restaurants and accommodation. Importantly, for medium term stays, the possibility that the individual traveller with disabilities becomes a resident, in the legal sense, of the country is excluded. This is important as in some cases, e.g. Lombardy in Italy, is an important prerequisite to gain access to preferential rates for local and regional transport.

For each travel scenario, the savings are estimated by summing up the reduced price or tariff for a person with disability (and, eventually, his/her personal assistant) for each of the activity described above. For short-term stays, savings estimates over the whole staying period for persons with disabilities that can enjoy full preferential conditions range from EUR 31 to 123 in total, when travelling alone. This increases to EUR 78 - 246 when travelling with a personal assistant, and summing the benefits for the persons with disabilities and their personal assistants. It is important to note that this last estimate relates to the savings if already travelling with a personal assistant, hence it does not imply that travelling accompanied is overall cheaper than traveling alone. Per day of travel (4 days), the estimated monetary benefits range from roughly EUR 7 to 30 per day if traveling alone, or from EUR 20 to 60 per day if travelling with a personal assistant.

For medium-term stays, savings estimates for persons with disabilities who can enjoy full preferential conditions range from EUR 100 to 400. Per day (60 days), the estimated monetary benefits are in the range of roughly EUR 2 to 7. Note that the lower benefit per day is partly by construction: a much lower concentration of activities (museum, cinemas, events) can be expected over a medium term stay rather than a shorter-term stay. This, mechanically, dilutes the benefits over a longer time span. Moreover, the transport discount that persons with disabilities usually enjoy is proportionally less relevant over a longer period, as monthly tickets are, per day, cheaper than daily tickets.

Overall, monetary benefits of preferential conditions when traveling for at least one night appear sizeable in all scenarios estimated, and more relevant, in proportion to the cost, for short term stays rather than long term stays. In part, this is because direct monetary benefits are concentrated in sectors that are strongly related to short-term travel (i.e. transport and museums/events/leisure activities). In general, the economic benefits are high across the spectrum of scenarios simulated, although with a high degree of variability. Indeed, if compared to the average spending for an overnight stay intra-EU for a person with disability, estimated

²⁸⁵ Economic Impact and Travel Patterns of Accessible Tourism in Europe - Full Report, 08/03/2015. Directorate-General for Enterprise and Industry, now known as Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs (DG GROW), European Commission. Available at: [link](#).

around EUR 102 per day in 2012 (and EUR 122 today, adjusted for inflation)²⁸⁶, the daily savings from preferential conditions range in percentage from 2 to 6% of daily spending for medium term stays, and up to 6 to 25% of daily spending for short term stays, depending on the country. To provide an additional order of magnitude, for short term stay, the smallest estimate for daily economic benefit (EUR 7) is a bit less than average price of an activity like cinema, theatre or museum; the upper bound instead, when traveling with a personal assistant, (EUR 60) equals the price of an important event (concert or football match), or a dinner, or of accommodation in a medium size city not in peak season.

To conclude, Table 35, Table 36 and Table 37 provide an overview of the different scenarios of individual traveller's journeys carried out, with the respective sources used for the construction of the journeys.

²⁸⁶ Economic Impact and Travel Patterns of Accessible Tourism in Europe - Full Report, 08/03/2015. Directorate-General for Enterprise and Industry, now known as Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs (DG GROW), European Commission. Available at: [link](#).

Table 35 – Scenario 1 of individual traveller’s journey (Dublin, Ireland)

Sector	Activity	Savings for person with disabilities (EUR)	Savings for personal assistant (EUR)	Notes	Sources
Transport	Airport to Dublin	7	7		https://www.dublinoxpress.ie/city-to-airport
	Dublin to Airport	7	7		
	Fast track at airport security	8	8		Dublin Airport
	Bus Fare city x 10	20	20		Bus Fare Info
	Dublin City to Dun Laoghaire	25	25		Dublin Bay Cruises
	Dun Laoghaire to Dublin City	25	25		Dublin Bay Cruises
	Car Rental	0	0	No discount but surrogate driver for free	Enterprise Ireland
	Monthly Transport Card	115-222 per month			Bus Fare info
Accommodation	n.a.	0	0	No hotel found explicitly offering a discount for people with disability	
Museum	Irish Emigration Museum	0	19	No discount for disabled person, but personal assistant enters for free	Irish Emigration Museum
	National Museum of Ireland	0	0	The museum is free for all	National Museum of Ireland
	Aviva Stadium event, accessible tickets	13	13	Discount is not clearly stated, but not free, assumption that tickets are half the price for a 25 euros event	Aviva Stadium

Sector	Activity	Savings for person with disabilities (EUR)	Savings for personal assistant (EUR)	Notes	Sources
	Abbey Theatre	5	0	Concession prices 5\$ off on standard event (20%)	https://booking.abbeytheatre.ie/
Amusement Park	Fort Lucan	7-14	7-14	free for kids with disability and accompanying adults	Fort Lucan Outdoor Prices
Cinema	Lighthouse cinema	4	0	No mentioned discount for personal assistant, reduced ticket for persons with disabilities	https://www.lighthousecinema.ie/
Restaurants		0	0	No restaurant explicitly offering a discount for people with disability found	
Total savings for 4-days stay (travelling with public transport, 1 museum, 1 theatre, 1 cinema, 1 day trip by ferry)		123	247		
Savings per day		31	62		
Total savings for 2-months stay (travelling by public transport, 5 museums, 1 ferry trip, 2 events, 1 theatre, 3 cinema, 1 amusement park)		423			
Savings per day		7			

Source: Authors' elaboration based on desk research

Table 36 – Scenario 2 of individual traveller's journey (Bergamo, Italy)

Sector	Activity	Savings for person with disabilities (EUR)	Savings for personal assistant (EUR)	Notes	Sources
Transport	Airport to Bergamo	0	0	No explicit mention of a preferential tariff for persons with disabilities, other than pets can travel for free	ATB Trasporti Bergamo
	Bergamo to Airport	0	0	No explicit mention of a preferential tariff for persons with disabilities, other than pets can travel for free	ATB Trasporti Bergamo
	Fast track at airport security	0	0	No mention of free fast track for persons with disabilities	Milano Bergamo Airport
	Bus Fare city x 10	0	0	No explicit mention of a preferential tariff for persons with disabilities, other than pets can travel for free	ATB Trasporti Bergamo
	Train to and from lake garda	0	0	Travel discounts for persons with disabilities are only for legal residents of the region, a disability card per se does not appear to be enough	Regione Lombardia Tariffa Agevolata
	Trenitalia (long/medium distance train) to Verona	10	40	20% discount or free travel on same train for the accompanying person	Trenitalia
	Car Rental				
	Monthly Transport Card	0	0	Only residents with disability can travel for free throughout the region, by paying a lump sum of 10 euros per year	Regione Lombardia Tariffa Agevolata
Accomodation		0	0	No hotel was found explicitly offering a discount for people with disability	

Sector	Activity	Savings for person with disabilities (EUR)	Savings for personal assistant (EUR)	Notes	Sources
Museum	Accademia Carrara	3	10-15	Persons with disabilities pay the reduced price, the personal assistant enters for free	Accademia Carrara
Theatre	Teatro Donizetti	8	0	Mean of the reduction with the persons with disabilities, no mention of accompanying people	Teatro Donizetti
	Cinema Conca Verde	0	0	Only reduction for senior and young people, no explicit discount for persons with disabilities	Conca Verde Cinema
Stadium	Gewiss Stadium Atalanta	30	30	Fee entry (with limited places) for persons with disabilities and personal assistants	Gewiss Stadium Atalant
Amusement Park	Gardaland	5	5	Ticket price 44 euros, 5 euros discount for persons with disabilities and extra 5 euro for personal assistants	GardaLand
Restaurants		0	0	No restaurant was found explicitly offering a discount for people with disability	
Total savings for 2-days stay (travelling with public transport, 1 museum ,1 theatre, 1 cinema, 1 day trip by train)		31	84		
<i>Savings per day</i>		8	21		
Total savings for 4-months stay (travelling by public transport, 5 museums,		100			

Sector	Activity	Savings for person with disabilities (EUR)	Savings for personal assistant (EUR)	Notes	Sources
	1 day trip by train, 2 events, 1 theatre, 3 cinema, 1 amusement park)				
	<i>Savings per day</i>	2			

Source: Authors' elaboration based on desk research

Table 37 – Scenario 3 of individual traveller's journey (Budapest, Hungary)

Sector	Activity	Savings for person with disabilities (EUR)	Savings for personal assistant (EUR)	Notes	Sources
Transport	Airport fast track	6	6	Monetary value of skipping the line (evaluated as the cost of buying the fast-track option)	Budapest Airport
	72 h travel card	15	15	Free local transport for persons with disability	Public Transport;
	Day trip to Visegrad	10	10	-90% discount on regional transport (not free)	Public Transport
	Local transport Monthly Pass	25 per month	25 per month	Monthly Budapest Pass	
Museums	Museum of Fine Arts	12	12	Persons with disabilities and one attendant holding an international card (it is stated that "national cards issued by local regulations cannot be treated")	Museum of Fine Arts
	Hungarian National Gallery	12	12		Hungarian National Gallery

Sector	Activity	Savings for person with disabilities (EUR)	Savings for personal assistant (EUR)	Notes	Sources
	The Citadel visegrad	0	0	No explicit discount mentioned for persons with disability	The Citadel
Amusement	Palatinus Strand	0	0	No explicit discount mentioned for persons with disability	Palatinus Strand
	Buda Castle	0	0	No explicit discount mentioned for persons with disability, only senior people	Buda Castle
	Opera House	0	0	No explicit discount mentioned for persons with disability, only students	Opera House
	Cinema	2	0	A discount for persons with disability is explicitly mentioned but not the amount (20% assumed on 10 euros ticket)	CinemaCity
Restaurants		0	0	No restaurant was found explicitly offering a discount for persons with disability	
Accommodation		0	0	No hotel was found explicitly offering a discount for persons with disability	
Total savings for 2-days stay (travelling with public transport, 1 museum ,1 theatre, 1 cinema, 1 day trip by train)		45	78		
<i>Savings per day</i>		11	20		
Total savings for 4-months stay (travelling by public transport, 5 museums,		142			

Sector	Activity	Savings for person with disabilities (EUR)	Savings for personal assistant (EUR)	Notes	Sources
1 day trip by train, 1 theatre, 3 cinema, 1 amusement park)					
<i>Savings per day</i>		2			

Source: Authors' elaboration based on desk research

Calculation of the travel gap

Table below provides an explanation regarding the assumptions made and the data sources used to estimate the travel gap between the total population and persons with disabilities, based on available information on tourism patterns for this sub-group of the population. The Table also describes the data used to estimate the total number of persons with disabilities, which were proxied using Eurostat data on "severe" limitations, given that in section 3.2.1 of the report this is shown to be a valid proxy for the number of persons with recognised disability in each Member State.

Finally, Table below shows how estimates for future years (with a time horizon stretching to 2030) were obtained and through which assumptions. In particular, the ranges used in the Final report, section 3.5 and the assessment of impacts of section 7, apply different scenarios of a varying travel gap between the general population and the population of persons with disabilities to the estimated participation in tourism of the general population in 2030 (estimated assuming a constant growth rate in line with the evolution of travel patterns for the general population between 2012 and 2030).

Table 38 – Data at the EU level for the estimation of the travel gap

Variable	Year	Amount	Source
Persons with "severe" disabilities	2012	30,917,031	<ul style="list-style-type: none"> Eurostat database, hlth_silc_12. Available at: link. Eurostat database, demo_pjan. Available at: link.
Persons with "severe" disabilities	2019	30,804,805	<ul style="list-style-type: none"> The share of persons with "severe" limitations (only available for persons aged 16 or older) from hlth_silc_12 is applied to the total population aged 16 or older from demo_pjan.
Participation in tourism of persons with disabilities aged 15-64	2012	58.1%	<ul style="list-style-type: none"> Economic Impact and Travel Patterns of Accessible Tourism in Europe - Full Report, 08/03/2015. Directorate-General for Enterprise and Industry, now known as Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs (DG GROW), European Commission. Available at: link.
Participation in tourism of the total population aged 15-64	2012	64.4%	<ul style="list-style-type: none"> Eurostat database, tour_dem_toage. Available at: link. Data are available from 2012 to 2019.
Participation in tourism of the total population aged 15-64	2019	69.1%	
Yearly growth rate in tourism of the total population aged 15-64 between 2012 and 2019	n.a.	0.7%	
Travel gap between the total population aged 15-64 and persons with disabilities aged 15-64	2012	6.3%	<ul style="list-style-type: none"> Difference between the participation in tourism of the total population aged 15-64 and the participation in tourism of persons with disability aged 15-64.
Participation in tourism of the total population aged 15-64 (<i>estimate</i>)	2030	74.7%	<ul style="list-style-type: none"> Obtained applying to the participation in tourism of the total population aged 15-64 in 2022 (assumed to be the same as the propensity in 2019, after the end of the disruptions caused by the pandemic) the yearly growth rate of the period 2012-2019, until 2030.
Participation in tourism of persons with disabilities	2030	68.3%	<ul style="list-style-type: none"> Obtained applying the constant 6.3% travel gap of 2012 to the participation in tourism of the general population estimated for 2030.

Variable	Year	Amount	Source
<i>(estimate, scenario of constant travel gap)</i>			
Total number of persons with disabilities travelling <i>(estimate, scenario of constant travel gap)</i>	2030	21,053,378	<ul style="list-style-type: none"> Obtained by applying the estimated participation in tourism of persons with disabilities in 2030 (scenario of constant travel gap) to the total number of persons with disabilities in the EU (assumed to be constant for simplicity, and considering that the number remained the same from 2012 to 2019).
Participation in tourism of persons with disabilities <i>(estimate, scenario of increasing travel gap)</i>	2030	62.8%	<ul style="list-style-type: none"> The estimate is obtained by assuming, in the worst-case scenario for the travel patterns of persons with disabilities, that their participation in tourism does not grow on par with that of the general population and remains constant until 2030.
Total number of persons with disabilities travelling <i>(estimate, scenario of increasing travel gap)</i>	2030	19,334,354	<ul style="list-style-type: none"> Obtained by applying the estimated participation in tourism of persons with disabilities in 2030 (scenario of increasing travel gap) to the total number of persons with disabilities in the EU (assumed to be constant for simplicity, and considering that the number remained the same from 2012 to 2019).
Travel gap <i>(estimate in the increasing travel gap scenario)</i>	2030	11.9%	<ul style="list-style-type: none"> Difference between the participation in tourism of the total population aged 15-64 and the participation in tourism of persons with disability aged 15-64 in the scenario of increasing travel gap.
Participation in tourism of persons with disabilities <i>(estimate, scenario of minimum improvements)</i>	2030	69.4%	<ul style="list-style-type: none"> Economic Impact and Travel Patterns of Accessible Tourism in Europe - Full Report, 08/03/2015. Directorate-General for Enterprise and Industry, now known as Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs (DG GROW), European Commission. Available at: link. The estimate is based on survey data collected in the context of DG GROW's study and reports the participation in tourism of persons with disabilities in a scenario of "minimum improvements" in accessibility.
Total number of persons with disabilities travelling <i>(estimate, scenario of minimum improvements)</i>	2030	21,378,534	<ul style="list-style-type: none"> Obtained by applying the estimated participation in tourism of persons with disabilities in 2030 (scenario of minimum improvements) to the total number of persons with disabilities in the EU (assumed to be constant for simplicity, considering that the number remained the same from 2012 to 2019).
Travel gap <i>(estimate in the minimum improvements scenario)</i>	2030	5.3%	<ul style="list-style-type: none"> Difference between the participation in tourism of the total population aged 15-64 and the participation in tourism of persons with disability aged 15-64 in the scenario of minimum improvements.
Participation in tourism of persons with disabilities <i>(estimate, scenario of moderate improvements)</i>	2030	74.7%	<ul style="list-style-type: none"> Economic Impact and Travel Patterns of Accessible Tourism in Europe - Full Report, 08/03/2015. Directorate-General for Enterprise and Industry, now known as Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs (DG GROW), European Commission. Available at: link. The estimate is based on survey data collected in the context of DG GROW's study and reports the participation in tourism of persons with disabilities in a scenario of "moderate improvements" in accessibility.
Total number of persons with	2030	23,011,189	<ul style="list-style-type: none"> Obtained by applying the estimated participation in tourism of persons with disabilities in 2030 (scenario of moderate improvements) to the total number of

Variable	Year	Amount	Source
disabilities travelling (estimate, scenario of moderate improvements)			persons with disabilities in the EU (assumed to be constant for simplicity, considering that the number remained the same from 2012 to 2019).
Decreasing travel gap (estimate, scenario of moderate improvements)	2030	0%	<ul style="list-style-type: none"> Difference between the participation in tourism of the total population aged 15-64 and the participation in tourism of persons with disability aged 15-64 in the scenario of moderate improvements.

Source: Authors' own elaboration based on the sources detailed in the "Source" column

Estimation of the impact of the policy options on the travel gap of persons with disabilities and value added to the market of accessible tourism

In light of very limited individual-level data and studies on tourism behaviors of persons with disabilities, estimating the impact of the policy options can only be made by combining various sources of information and making several assumptions. Firstly, it is assumed that the highest impact of any preferred policy option is to close the travel gap of persons with disabilities relative to the general population. This assumption can be considered sufficiently credible given that it is unlikely, given the socio-economic disparities between persons with and without disabilities as well as remaining barriers in accessibility that would not be addressed by the policy options, that a single policy could induce persons with disabilities to travel abroad relatively more than the general population. While the policy options considered are expected to bring relevant costs savings for persons with disabilities, it is unlikely that they would more than offset such disparities. An additional assumption is that the preferred policy option is unlikely to have a negative impact on the travel gap, which is highly credible. Thus, it is expected that the impact of the policy option on the travel gap to vary between 0 and 6.3 percentage points, the latter being the estimated travel gap.

With these assumptions in mind, in order to assess the **potential impact of the policy options on the travel gap**, a specific question from the Public Consultations is used, which asks respondents to assess to what extent the European Disability Card could increase the number of persons with disabilities travelling in the EU. 1126 stakeholders answered this question, most of them being EU citizens (999 respondents; non-EU citizens and "Other" were excluded). The question uses a qualitative Likert scale with five response options: "Very high extent", "High extent", "Moderate extent", "Small extent" and "Not at all". The distribution of responses is reported in Table 1 below. Following the standard practice in the psychometric literature when aggregating qualitative answers into a quantitative assessment, numerical values are assigned to the qualitative scale, ranging from 0 for "Not at all" to 4 for "Very high extent". With this procedure, the average value on the question is computed which turns out to be 2.87, implying that, according to respondents, on average the European Disability Card would roughly increase the number of persons with disabilities travelling in the EU to "a high extent". To transform this estimate into an estimate of impact in terms of the travel gap, an additional assumption must be made. If all respondents to this question would have indicated "Not at all", then the expected impact on the travel gap would have been 0. If instead, all respondents would have indicated "Very high extent", then the expected impact on the travel gap would have implied the closing of the travel gap of 6.3 percentage points. With this additional assumption, the computed average is used in order to calculate the expected impact on the travel gap through a simple normalization: $6.3 * (2.87 / 4) = 4.52$ percentage points. We attribute such an effect to the policy options A2 and B2 even though the questionnaire nor the question provided specific detail into what sectors the European Disability Card would cover. However, since prior to this question, respondents were asked to indicate which sectors they would consider relevant it is assumed they may have expected the policy to include all relevant sectors, Parking included (A2 + B2). Thus, it is estimated that A2 + B2 could reduce the travel gap by 4.52 percentage points.

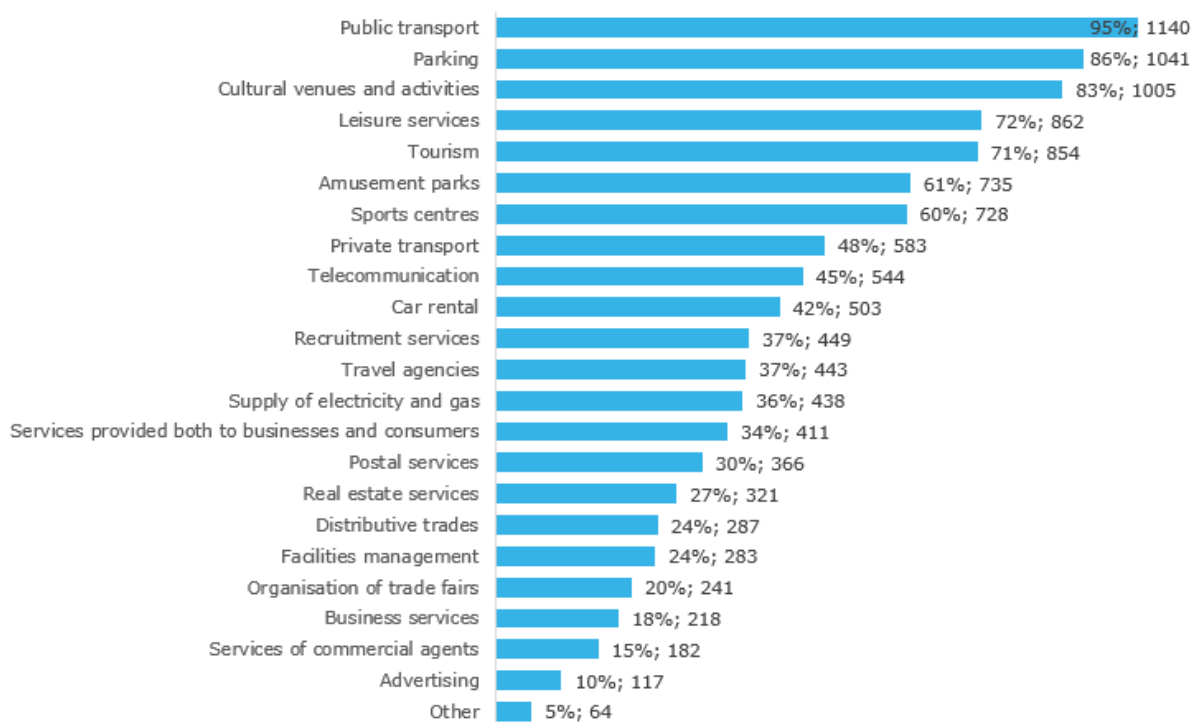
Table 39 - Distribution of responses in the public consultation to the question "To what extent do you think the European Disability Card could increase the Increasing the number of persons with disabilities travelling in the EU"

	N	%
Very high extent	336	29.8%
High extent	414	36.8%
Moderate extent	285	25.3%
Small extent	74	6.6%
Not at all	17	1.5%
Total	1126	100%

Source: Authors' elaboration based on public consultation

The next step is to disentangle the effect of A2 from B2 and to try to estimate also the effects of A1. Option B1 is discarded from the analysis since it is expected to be only marginally effective relative to the baseline and highly variable in terms of impact due its voluntary nature. The goal is to quantify the relative value of the sectors included in each policy option. Again, the Public Consultations is used in absence of other data sources. Respondents were asked to indicate which sectors they believed would be important to be covered by the card. Figure below reports the distribution of responses for each sector. To obtain the relative value of each sector, first is must be assumed, in the absence of more detailed information, that if a respondent selected multiple sectors, she/he attributes the same value to those sectors. With this assumption in mind, the aggregate relative value of sectors covered the policy options is computed using the distribution of responses on this question. If a given sector was selected by more respondents, then its relative value is considered to be higher. Specifically, the value of each sector is computed by dividing the number of respondents selecting that sector by the sum of respondents selecting each individual sector. For instance, the value of public transport would be = $100 * \frac{1140}{(114 + 1041 + 1005 + \dots + 182 + 117 + 64)} = 9.65\%$, higher than what would be obtained if all the sectors were valued equally, which would simply be $100 / 23$ (number of sectors) = 4.35%. By doing a similar calculation for the sectors covered by A2 and B2, the value of A2 is estimated at 91.2%, while the estimate for B2 is 8.8%. Thus relatively, A2's value is 10.3 times higher than of B2 which allows to separate the effect of A2 from B2 in the calculation reported previously. Out of the 4.52 percentage points impact, 0.4 percentage points would be due to B2 and the remainder 4.12 percentage points to A2. Through a similar calculation, the relative value of A2 to A1 can be calculated. The estimate is 2.13, implying that the impact of A1 in terms of reducing the travel gap is estimated to be 1.94 percentage points.

Figure 11 - Distribution of responses in the public consultations to the question “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?”



Source: Authors' elaboration based on public consultation

Up to now, one of the assumptions was that the maximum potential effect of the policy options is the complete closing of the travel gap. However, this is likely to be outside of the range of effects of the policy options considering that, according to the DG Grow report, only 68% of persons with disabilities who do not travel abroad do so due to financial reasons which is one dimension particularly impacted by the policy options. Using this share, the exercise performed above is updated considering the upper bound to be 68% of the travel gap, thus $68\% \times 6.3 = 4.28$ percentage points. The results are reported in Table 2 below and are considered as more realistic estimates of the potential impacts of the policy options on the travel gap between persons with disabilities and the general population. The table also reports the impacts expressed in terms of **value added in the market for accessible tourism** obtained from the DG Grow report.²⁸⁷ It is important to underline that, given the way it is calculated, this figure includes the value added generated by persons with disabilities given all their activities and spending when travelling. As such, it is not limited to activities carried out within the specific sectors specified or not specified by the policy options (A1 or A2). In short, it has to be understood as the extra value added generated by all activities of persons with disabilities when travelling. For each policy option, the impact is calculated by multiplying the impact in terms of the travel gap with the value added of the market due to travels from persons with disabilities obtained from the DG Grow report and adjusting it for inflation over the period 2012-2023.

²⁸⁷ The following formula is taken into account to calculate the direct economic contribution in the DG Grow report. Daily spending accounts for all possible activities. *Direct economic contribution = daily spending × length of stay × people with access needs × travel propensity × travel frequency*

Table 40 - Estimated impact of the policy options in terms of travel gap reductions and value added in the market for accessible tourism

Policy Options	Scenario 1 – the 6.3 percentage can be closed	Assuming that points travel gap	Scenario 2 – Only 68% of travel closed	Assuming that gap can be
	Travel gap reduction (percentage points)	Accessible tourism value added	Travel gap reduction (percentage points)	Accessible tourism value added
A1	1.94	1.5 billion EUR	1.32	1 billion EUR
A2	4.12	3.1 billion EUR	2.8	2.1 billion EUR
B1	negligible	-	negligible	-
B2	0.4	0.3 billion EUR	0.27	0.2 billion EUR

Source: Authors' elaboration

To conclude, it is estimated that, A1 may reduce the 6.3 percentage points travel gap by between 1.32 and 1.94 percentage points. The impact of A2 is expected to be roughly twice as large, ranging between 2.8 and 4.12 percentage points. While B1 is expected to have a small impact impossible to quantify ex-ante given the largely voluntary nature of the policy option, for B2 the estimated impact ranges between 0.27 and 0.4 percentage points. In terms of yearly value added in the market for accessible tourism, the estimates range from 1.32 to 1.94 billion EUR for A1, from 2.8 to 4.12 billion EUR for A2, and from 0.2 and 0.4 billion EUR for B2. As highlighted, in the absence of richer data, several strict assumptions were made which imply that such estimates should be treated only as suggestive and interpreted with caution.

Potential net benefits of the policy options

To compute the net benefits of the policy options, a conservative approach is taken, considering in the calculations the lower bound of the accessible tourism value added impacts and taking the upper bound of potential costs, wherever applicable. The increased value added, generated by persons with disability travelling more, comprises all the aggregated benefits of the policy options. The costs of providing preferential conditions, which are necessary as a result of the EDC, are included in total costs even though they represent at the same time a saving for persons with disabilities and would cancel each other out. Thus, the final estimate is expected to be, given the available data and assumptions made, a lower bound estimate of the overall net benefit of the policy options.

Starting with the policy options in policy area A, the following quantified costs are considered:

- **Cost of offering preferential conditions for service providers:** First, based on the analysis of costs in the transport sector, travel journeys, mapping of preferential conditions and the perceived relative value of the sectors in A1 and A2, it is estimated that the costs of providing preferential conditions would vary roughly between 190 and 264 million EUR yearly for A1 and between 254 and 353 million EUR yearly for A2.
- **Cost of producing the card:** Full take-up of the card is assumed for both policy options A1 and A2 (32.2 million persons with disabilities), which allows to calculate to maximum aggregate production and delivery costs, relying on the upper bound estimates of such costs from the EU Disability Card pilot project (given the updated security features of the EDC adjusting the value for inflation which turns out to be 174.2 million EUR. It is highly unlikely that the take-up of the Card will reach such values in one year, especially for A1 which has fewer sectors, but as this is a conservative approach to the calculation of net benefits.
- **Additional costs:** digital costs, administrative costs, national websites cost and awareness raising costs, for a total of 5.14 million euros in 2023.

Taking the lower bound of the value-added estimates (1 billion EUR for A1 and 2.1 billion EUR for A2), results in a net benefit of A1 of 0.55 billion EUR for A1 and 1.56 billion EUR for A2.

For the policy options in the policy area B, the calculations are performed only for B2 given the uncertainty regarding the take-up of B1 across Member States. Nonetheless, an explanation is provided regarding what can be expected for B1 and the end of the paragraph.

- **Cost of offering preferential conditions for service providers:** In the absence of data, the costs of providing preferential conditions are assumed, based on the analysis of the relative value of sectors, to be about one fifth with respect to A1, thus varying roughly from roughly 40 million EUR to 55 million EUR yearly.
- **Cost of producing the card:** The take-up of the card is assumed, given the reduction in uncertainty, to be twice as large as what is currently observed (50% relative to the 25% current estimated value). Multiplying this with the unit production and delivery costs and with the number of persons with disabilities, results in a cost of 87.7 million EUR.
- **Additional costs:** costs of the website is included; other cost included in the policy option (such as the database) are assumed to be zero because can be integrated in existing systems

This results in a net benefit of 56.24 million EUR, considering the lower bound estimate of value-added impact (0.2 billion EUR). For policy option B1 the next benefit is expected to be at most this value if all Member States comply. However, the net benefit is not expected to increase linearly with the number of Member States. While costs may have a more linear increase, benefits are expected to follow an S shaped curve relative to the number of Member States complying – i.e. to grow slowly initially and much faster as more Member States join the initiative. Thus, it is preferable in terms of net benefits if a high number of Member States comply, a feature guaranteed by B1.

Table 41 - Total estimates of benefits, costs and net benefits of the policy options

Policy Options	Lower bound total benefit - accessible tourism value added	Upper bound total costs	Conservative net benefit estimate
A1	1 billion EUR	0.44 billion EUR	0.55 billion EUR
A2	2.1 billion EUR	0.53 billion EUR	1.56 billion EUR
B1	-	-	-
B2	0.2 billion EUR	0.14 billion EUR	0.056 billion EUR

Source: Author's elaboration

Detailed assessment of costs for the transport sector

The following tables provide a more in-depth assessment of the expected costs of the policy options aimed at facilitating mutual recognition of disability status in the EU for service providers in the transport sector. In particular, the focus is on the cost of offering preferential conditions already offered to nationals also to travellers with disabilities from other Member States. In Section 3.2.2, Table 5 of the Final report, the sector was identified as one of those offering the most preferential conditions (either mandated by law or on a voluntary basis) to persons with disabilities. For this reason, a more detailed assessment of potential costs for this sector resulting from the implementation of the EDC in options A1 and A2 was deemed necessary.

Within the EU, there is great variety in the extent and amount of preferential conditions offered to persons with disabilities and their personal assistants in the transport sector across Member States. At the same time, data on such preferential conditions is scarce and as a consequence, precise estimates of the costs to be incurred by a given sector are hard to obtain. Moreover, the main limitation to perform this calculation is the absence of data on the number of persons with disability who currently enjoy preferential conditions when travelling within the EU. Nevertheless, illustrative examples can be used to pin down the magnitude of the direct costs for the transport sector of policy options A1 and A2. In this case, estimates of costs of the transport sector are obtained thanks to information on preferential conditions (such as discounts and reduced fees for both persons with disabilities and their personal assistants) obtained via desk research. The estimation exercise is carried out for a set of 10 Member States: Belgium, Croatia, Estonia, France, Germany, Hungary, Ireland, Italy, Romania and Spain.

The following steps were carried out in order to perform the exercise.

- First, the **total number of tourism trips of persons with disabilities aged 15 to 65 to each of the selected Member States** is estimated. Precise data of total tourism trips is available from Eurostat, but the number of trips for persons with disability, as well as the additional travel that would occur because of the EDC, can only be obtained with

some assumptions, outlined below. **Persons above 65 years of age are already assumed to be offered preferential conditions available to the elderly, and, as such, are not included directly in the calculations of the estimated costs.**

- Secondly, the **direct costs of offering preferential conditions for the transport sector** during the trip of an individual traveller with disabilities are also estimated for each Member State considered. Importantly, these journeys are assumed to last between 5 and 8 days on average: in fact, according to estimates, an average tourism trip in the EU in 2019 (the last year for which data are available before the travel disruptions caused by the pandemic) lasted 5 nights. An average tourism trip to a domestic destination lasted 4 nights on average, while an average tourism trip to a foreign destination (i.e. not to the country of residence, which is closer to the scenario of interest in this context) lasted about 8 nights.²⁸⁸ The costs are thus estimated by listing a potential set of activities performed by the traveller during the trip, involving the transport sectors and compatible with an overnight stay ranging between 5 and 8 nights. The potential frequency of each activity is also taken into account, for example by considering that a long-distance trip within a given country occurs less frequently than taking the bus in a metropolitan area. Further details are provided below and in Table below.
- Finally, the total number of tourism trips of persons with disabilities from other Member States and the cost for the transport sector of a 5 to 8 days trip to each Member State are multiplied to obtain the **total costs for the transport sector**, according to the estimation exercise.

Regarding information on the number of tourism trips that persons with disabilities take part in across Member States and their participation in tourism, Table below provides a detailed breakdown of the type of information that was used for the estimation and the related sources. The number of tourism trips to each Member State from persons from other Member States was gathered via Eurostat. From this, the number of tourism trips from persons with disabilities was estimated under two different scenarios, one with and one without the EDC. For this estimation, the travel frequency, i.e. the number of trips taken in a year, was assumed to be the same between PwD aged 15-65 and the general population aged 15-65.²⁸⁹ In the scenario without the EDC, the number of tourism trips to each Member State was multiplied by the share of persons with disabilities in the EU in 2021 (the latest year for which data on the incidence of disability are available) adjusted by their participation in tourism (estimated for 2019 assuming a constant travel gap with respect to 2012 and applying it to the participation in tourism of the general population). As anticipated, information on travelling patterns are always drawn from 2019, as it is the latest year for which data are available before the travel disruptions caused by the pandemic, and is therefore more representative of the current situation. In the scenario with the EDC, the gap is assumed to have closed and the total number of tourism trips is simply multiplied by the share of persons with disabilities in the population, as if the general population and persons with disabilities participated in tourism at the same rate. The difference between the number of tourism trips of persons with disabilities in the maximum and minimum participation in tourism scenario can be thought of as the maximum possible increase in their tourism trips (i.e. an increase due to complete closure of the travel gap) resulting from options A1 or A2. Such an increase is, however, unlikely to happen in practice as the travel gap is due to several factors other than the lack of mutual recognition of disability status, including accessibility and financial constraints. For these reasons, this has to be understood as an upper bound of the true effect, and, consequently, of the true cost for the transport sector.

288 See presentation of Eurostat statistic: [here](#)

289 The only data available on the travel frequency of PwD aged 16-65 is in the DG Grow Report on Accessible Tourism (see previous footnote), where both PwD and the elderly report a travel frequency significantly higher than the general population, probably because of self-selection of travellers into the online survey used to calculate these figures. Indeed, for the elderly population (65+), for whom the travel frequency figure can be obtained from both Eurostat and the DG grow report and compared, the travel frequency is significantly higher in the DG grow report sample. Given it is unlikely that PwD have a higher travel frequency than the general population, the assumption is made that the travel frequency are, in the best case scenario, the same between the two groups, and only the travel propensities, i.e. the probability to travel, differ.

Table 42 – Estimation of tourism trips from persons with disabilities to selected Member States

Variable	Source	Year	Member State/EU 27	Amount
Travel gap (difference between the participation in tourism of the general population and that of persons with disabilities aged 15-65)	Participation in tourism of persons with disabilities from: Economic Impact and Travel Patterns of Accessible Tourism in Europe - Full Report, 08/03/2015. Directorate-General for Enterprise and Industry, now known as Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs (DG GROW), European Commission. Available at: link . Participation in tourism of the general population from: Eurostat database, tour_dem_toage. Available at: link .	2012	EU 27	6.3%
Participation in tourism of the general population aged 15-65	Eurostat database, tour_dem_toage. Available at: link .	2019	EU 27	69.1%
Participation in tourism of persons with disabilities aged 15-65 (<i>baseline estimate</i>)	Estimated as the participation in tourism of the general population, minus the travel gap	2019	EU 27	62.8%
Participation in tourism of persons with disability aged 15-65 (<i>best case scenario with the EDC</i>)	Estimated assuming the travel gap has closed and the travel propensities of the general population and persons with disabilities are equal.	2019	EU 27	69.1%
Incidence of persons with "severe" disabilities in the population aged 15-65	Eurostat database, hlth_silc_12. Available at: link .	2021	EU 27	5.3.%
Share of persons with 16-65 in the total population	Eurostat database, available at link	2021	EU 27	64.1%
Share of persons with disability requiring assistance	Eurostat database, hlth_dpeh. Available at: Link , elaborated at link	2012	EU 27	32%
Number of tourism trips (to the Member State) of persons from other Member States	Eurostat database, tour_dem_ttw. Available at: link .	2019	Belgium	7,322,120
			Croatia	9,148,672
			Estonia	2,338,333
			France	20,703,816
			Germany	21,381,766
			Hungary	4,299,138
			Ireland	2,228,143
			Italy	28,452,724

Variable	Source	Year	Member State/EU 27	Amount
Number of tourism trips of persons with disabilities aged 16-65 from other MS(baseline estimate)	Estimated multiplying the total number of tourism trips by the share of persons aged 15-65 with disability in the population, corrected by their participation in tourism	2019	Romania	3,876,987
			Spain	31,654,630
			Belgium	226,777
			Croatia	283,348
			Estonia	72,422
			France	641,229
			Germany	662,226
			Hungary	133,151
			Ireland	69,009
			Italy	881,225
Number of tourism trips of persons with disabilities aged 16-65 (best case scenario with the EDC)	Estimated multiplying the total number of tourism trips by the share of persons with disability in the population (hence, assuming the travel gap has closed)	2019	Romania	120,076
			Spain	980,393
			Belgium	248,754
			Croatia	310,808
			Estonia	79,440
			France	703,371
			Germany	726,403
			Hungary	146,055
			Ireland	75,697
			Italy	966,624
Romania	131,713			
Spain	1,075,403			

Source: Authors' own elaboration based on Eurostat data and DG GROW's report on accessible tourism

After estimating the number of trips from persons with disabilities, the costs for the transport sector of one journey for a person with disability and their personal assistant are computed by listing a set of activities related to transport potentially carried out during a tourism trip and adding up their costs. The activities are detailed in Table below and include: the purchase of 10 standard fare tickets in a city with the local public transport system, 2 tickets for a short distance journey and 2 tickets for a transfer to the airport. A medium distance and a long distance journey are also included, but for only 50% and 20% of the trips respectively, as it can reasonably be expected that a portion of all tourists, rather than staying in their first destination, choose to also travel to other destinations during the trip. For each activity, the cost of a ticket is obtained via desk research, together with information on discounts or reduced fees reserved to persons with disabilities and their personal assistants. Detailed information on this process is collected in Table 49, at the end of this Section.

Table 43 – Individual traveller’s journey for the assessment of costs of the transport sector

Trips included	Frequency	Member States
Standard bus fare within a city	10 times during the trip	Belgium, Croatia, Estonia,
Short distance journey	Twice during the trip (A/R ticket)	France, Germany, Hungary,
Medium distance journey	Once during the trip, for 50% of all trips	Ireland, Italy, Romania,
Long distance journey	Once during the trip, for 20% of all trips	Spain
Transfer to the airport	Twice during the trip (A/R ticket)	

Source: Authors’ own elaboration

Finally, the costs for the transport sectors are estimated as the monetary amount of the discount or reduced fee for the person with disability (e.g. if the price of the ticket is EUR 10 and the discount for persons with disability is 60%, the cost for the service provider in the transport sector is estimated at EUR 6). The same holds for personal assistants.

Despite the difficulties in calculating the participation in tourism of persons with disability (and the potential change in travel patterns due to the EDC), there are two other main sources of uncertainty underlying this estimation: i) uncertainty about the number of persons with disability who currently, despite the uncertainty related to the provisions of preferential conditions in other Members States, benefit from these preferential conditions nonetheless; ii) uncertainty about the share of persons with disability who travel with a personal assistant, who often also benefits from preferential conditions. To overcome the first issue, the number of persons with disability who *already* benefit from preferential conditions, the answers from the Public Consultation are considered, where 46% of respondents (EU citizens with disability aged 15-65) reported ever being denied access to preferential conditions when abroad. This proportion is taken as the highest number of persons who could gain access to preferential conditions for all countries (while this could, of course, vary by sector and country, this disaggregation is not possible with the data at hand). Regarding the issue of how many PwD travel with a personal assistant, who could also benefit from preferential conditions, different estimates are available: i) in 2012, Eurostat reported the share of persons with disability requiring assistance, estimated around 32% for EU population aged 15-64;²⁹⁰ ii) from the DG Grow report²⁹¹, where 73% of persons with disability aged 16-65 report travelling accompanied, as well as the online survey targeted to persons with disability conducted during the study, where 14 out of 17 PwD (82%)²⁹² answered that they do need a personal assistant to travel. On the one hand, only recognised personal assistants get access to preferential conditions *because* of the EDC, as the official personal assistant would have to be recognized the same preferential conditions offered to nationals. On the other hand, accompanying persons who are not the personal assistant can still be offered preferential conditions voluntary by service providers²⁹³. In estimating the costs, both values (the share who requires a personal assistant (32%) and the share who travels accompanied (73%)) are employed to obtain a lower and an upper bound of the costs. For this reason, a range of estimates is presented.

There are two main reasons to take these estimates as a overestimate of the costs of offering preferential conditions as a result of the EDC in the transport sector: i) the EDC is estimated to close the gap in participation in tourism between PwD and the general population, which is the best case scenario and unlikely to happen without significant improvements in accessibility; ii) 46% of PwD are assumed not to benefit at the moment from preferential conditions, which is the maximum value given that these are PwD reporting *ever* being denied a preferential condition abroad (in any country or sector). Moreover, of the range of estimates

²⁹⁰ The data is available [here](#) (database: HLTH_DPEH) and elaborated by Eurostat at [this link](#).

²⁹¹ Economic Impact and Travel Patterns of Accessible Tourism in Europe - Full Report, 08/03/2015. Directorate-General for Enterprise and Industry, now known as Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs (DG GROW), European Commission. Available at: [link](#). Participation in tourism of the general population from: Eurostat database, [tour_dem_toage](#). Available at: [link](#).

²⁹² Survey targeted at PwDs Q2.3;

²⁹³ See an example [here](#).

presented, the lower bound is the one that more truly reflects the costs from the obligation of offering preferential conditions to persons with disability and their assistant. The decision to offer preferential conditions to other accompanying persons would remain voluntary for each service provider.

The resulting range estimated total costs for each country are shown in Table below. To gauge the magnitude of these estimates, Table 9 also compares the figures with the relative size of the passenger transport sector (excluding air travel), measured in terms to turnover²⁹⁴ in 2019. The size of the passenger transport sector excluding air travel is not always publicly available for all Member States, as, for some MS, the disaggregation that are necessary to obtain this figure are marked as confidential in recent years.²⁹⁵ Nonetheless, it was preferred to employ these figures for comparison, when available, rather than the total turnover (or value added) in *entire* transport sector, including freight transport or air travel, which would be much less indicative of the size of the sector affected by the preferential conditions. When some of the necessary cells were not available, the turnover was imputed by using values available for previous years, adjusted by the growth in the rest of the passenger transport sector.

Another comparison to gauge the order of magnitude of these costs is to compare them to *what it (would) cost* to offer the **same** preferential conditions to the elderly (65+) travelling to other Member States, assuming they already benefit from the same or similar preferential conditions. The elderly are a significantly larger share of the EU population than persons with disability (20.8% in 2021²⁹⁶) and, although they are estimated to have a lower participation in tourism than PwD (49.6% in 2019²⁹⁷), they account for a higher share of total trips. Moreover, the elderly also have a much higher incidence of disability, estimated around 18.4% in 2021²⁹⁸, which implies their personal assistant, if any, could also get access to preferential conditions. In this comparison, it is also taken into account that in the Public Consultation persons with disabilities aged 65+ report much less incidence of ever being denied preferential conditions abroad: only 29% compared to 46% among persons with disabilities aged 15-65. In Table below, the cost of offering preferential conditions to travelling PwD aged 15-65 and their personal assistants in the transport sector is compared to the cost of offering the same preferential conditions to the elderly population (also taking into account that some elderly might be accompanied by a personal assistant, if they are also persons with disabilities).

The magnitude of the expected direct costs of offering preferential conditions for transport service providers (excluding air transport) are presented in Table 9, and are commented in the main report. Overall, the costs range between 1.7. to 31.2 million EUR depending on the Member State in question, and the assumption regarding the share of personal assistant/accompanying persons eligible for discounts. This range is driven mostly by the different sizes of the Member States, and, to a much lesser extent, by different touristic attraction, and availability of preferential conditions (with the exception of Italy, where preferential conditions in transport are often related to residence status). For those countries in which the size of passenger transport sector can be obtained, these additional costs appear very small relative to overall turnover, ranging from 0.01% to 0.31%. Table below also presents what would cost (or currently does cost, for those countries that offer them) to offer *the same* preferential conditions to the elderly (65+). In most countries, the cost is significantly lower, usually less than one-fourth. The exceptions are France, where it would be between one third and one half, and Italy, where it would be above one half: the reason is that in both countries most of the savings from preferential conditions apply to the personal assistant and not the PwD, so assuming that the elderly person gets the same preferential condition of the PwD (which is unlikely in this case) mechanically gives an higher estimate.

²⁹⁴ For the definition of turnover, see [Eurostat](#)

²⁹⁵ The data is available from Eurostat dataset: SBS_NA_1A_SE_R2, at the following [link](#).

²⁹⁶ Source: Eurostat. Available at: [link](#)

²⁹⁷ Source, Eurostat. Available at: [link](#)

²⁹⁸ See [here](#) for the incidence of severe limitations for the EU population aged 65+.

Finally, it needs to be taken into account that these results are to be considered as only suggestive of the order of magnitude of total costs of policy options A1 and A2 for the transport sector. An exact estimate by country of the total costs is difficult to obtain, in particular because of absence of information on how many persons with disability currently travelling benefit from preferential conditions in the transport sector.

Table 44 – Range of estimated yearly costs in the transport sector in selected Member States

Costs		Belgium	Croatia	Estonia	France	Germany
Costs due to trips from persons with disabilities 15 to 65 from other Member States (including personal assistants)	Total	€5,618,824 - €8,044,334	€2,021,504 - €2,505,692	€1,768,118 - €2,317,306	€13,118,033 - €21,219,981	€23,588,985 - €28,144,220
	<i>As %Turnover of passenger transport sector*</i>	0.11% - 0.16%	N/A	0.24% - 0.31% (e)	0.02% - 0.04%	0.05%-0.06% (e)
	<i>As % of cost of offering same preferential conditions to all 65+</i>	22.5% - 31.7%	18.5%- 22.8%	19.8% - 25.7%	28.5% - 44.7%	17.8% - 21.0%

Source: Authors' own elaboration.

*including passenger water transport, but excluding passenger air transport., (e), indicates that the value of turnover in million EUR was not available, and was imputed from previous years, when available, to obtain the relevant estimate. N/A indicates not available, when even in years prior to 2019 the data to obtain the value of turnover in passenger transport, excluding air transport, was not available.

Table 45 – Range of estimated yearly costs in the transport sector in selected Member States (Table 44 continued)

Costs		Hungary	Ireland	Italy	Romania	Spain
Costs due to trips from persons with disabilities 15 to 65 from other Member States (including personal assistants)	Total	€3,652,452 - €4,741,892	€3,586,174 - €4,700,061	€2,845,742 - €5,352,441	€2,247,327 - €2,945,361	€22,238,741 - €31,200,047
	<i>As %Turnover of passenger transport *</i>	0.16% - 0.20% (e)	0.11% - 0.15% (e)	0.01% - 0.02%	0.11%- 0.15%	0.16%- 0.22% (e)

Costs		Hungary	Ireland	Italy	Romania	Spain
	<i>As % cost of offering same preferential conditions to all 65+</i>	19.6% - 25.2%	19.8% - 25.7%	45.7%-80.2% ++	19.8% - 25.7%	21.8% - 30.1%
Costs due to trips from persons with disabilities 15 to 65 from other Member States (including personal assistants)	Total	€3,652,452	€3,586,174	€2,845,742	€2,247,327	€22,238,741
		- €4,741,892	- €4,700,061	- €5,352,441	- €2,945,361	- €31,200,047
	<i>As %Turnover of passenger transport *</i>	0.16% - 0.20% (e)	0.11% - 0.15% (e)	0.01% - 0.02%	0.11%-0.15%	0.16%-0.22% (e)

Source: Authors' own elaboration.

**including passenger water transport, but excluding passenger air transport., (e), indicates that the value of turnover in million EUR was not available, and was imputed from previous years, when available, to obtain the relevant estimate. N/A indicates not available, when even in years prior to 2019 the data to obtain the value of turnover in passenger transport, excluding air transport, was not available. ++ The reason for this number is that preferential conditions in Italy are present virtually only for personal assistants. Assuming that the elderly get the same preferential conditions of PwD (but without the personal assistant), mechanically inflates this number.*

The range of estimated costs in the total EU-27 is presented in Table below. In order to obtain this estimate, it needs to be assumed that the 10 countries for which prices and preferential conditions were collected in the transport sector are representative of the EU-27. This assumption seems reasonable considering that the 10 countries sampled account for roughly 69% of the EU-27 population in 2021, and include both small and large Member States. The estimate is obtained by taking an average per capita cost for the 10 countries for which data is available, as well as population-weighted average per capita cost, which takes into account the size of the different Member States. These average per capita costs are then multiplied by the EU-27 population to obtain the total cost (both lower and upper bound, depending on assumptions regarding personal assistant/accompanying persons stated above.) **The total yearly costs are estimated to range between 116 and 161 million EUR, accounting for only 0.05% to 0.08% of (non-air) passenger transport in the whole EU-27.**

Table 46 – Range of estimated yearly costs in the transport sector at EU 27 level

Country	<i>Per capita cost Lower bound</i>	<i>Per capita cost Upper bound</i>	<i>Population (2021)</i>
Belgium	€0.5	€0.7	11590000
Croatia	€0.5	€0.6	3899000
Estonia	€1.4	€1.8	1300000
France	€0.2	€0.3	67750000
Germany	€0.3	€0.3	83820000
Hungary	€0.4	€0.5	9710000
Ireland	€0.7	€0.9	5030000
Italy	€0.0	€0.1	59110000

Country	Per capita cost Lower bound	Per capita cost Upper bound	Population (2021)
Romania	€0.1	€0.2	19120000
Spain	€0.5	€0.7	47420000
Average per capita cost	€0.5	€0.6	
Population weighted average per capita cost	€0.3	€0.4	
	Total Cost – Lower Bound	Total Cost – Upper Bound	
EU 27 Population (2021)	447,207,489		308,749,000 (the 10 countries where transport data was collected account for 69% of EU population in 2021)
EU-27 Cost	€116,869,492.0	€161,026,119.7	
As %Turnover of passenger transport *	0.05% (e)	0.08% (e)	

Source: Authors' own elaboration. *including passenger water transport, but excluding passenger air transport., (e), indicates that the value of turnover in million EUR was not available, and was imputed from previous years, when available, to obtain the relevant estimate.

Table 47 – Detailed assessment of costs for service providers in the transport sector through traveller's journeys

MS	Activity	Savings for person with disabilities (EUR)	Savings for personal assistant (EUR)	Km	Notes	Sources
	Standard bus fare in the city of Antwerp	2.5	2.5	n.a.	An administrative fee of EUR 5 to receive a free travel pass card; the accompanying person needs to have a special card that recognises them as an assistant (no fee to get such card). Visually impaired do not pay the EUR 5 administrative fee.	Lijn website. Available at: link .
BE	Short distance trip by train (Brussels to Mechelen)	2.0	5.2	25	50% discount; need to have a specific card in order to receive a discount, the accompanying person needs to have a card that recognises them as an accompanying person.	Belgiantrain website. Available at: link .

MS	Activity	Savings for person with disabilities (EUR)	Savings for personal assistant (EUR)	Km	Notes	Sources
MS	Medium distance trip by train (Brussels to Antwerp)	3.6	8.4	55	50% discount; need to have a specific card in order to receive a discount, the accompanying person needs to have a card that recognises them as an accompanying person.	Belgiantrain website. Available at: link .
	Long distance trip by train (Brussels to Knokke)	8.8	19	124	50% discount; need to have a specific card in order to receive a discount, the accompanying person needs to have a card that recognises them as an accompanying person.	Belgiantrain website. Available at: link .
	Transfer to airport (Brussels Midi to Charleroi)	0	16.6	55	No discount for the person with disability; if the person with disability is in a wheelchair then the carer has a 100% discount but needs to book a ticket at least 72h in advance via e-mail.	Flibco website. Available at: link .
	Total cost for a trip of 5-days	32.6	51.7			
HR	Standard bus fare in the city of Zagreb	0.5	0	n.a.	100% discount only if resident in Zagreb; the guide dog, when needed, travels for free.	Zet website. Available at: link .
	Short distance trip by train (Zagreb to Velika Gorica)	1.1	1.5	16	75% discount; the assistant travels for free	Hzpp website. Available at: link .
	Medium distance trip by train (Zagreb to Karlovac)	3.4	4.6	53	75% discount; the assistant travels for free	Hzpp website. Available at: link .
	Long distance trip by train (Zagreb to Split)	11.3	15.1	409	75% discount; the assistant travels for free	Hzpp website. Available at: link .
	Transfer to airport (from the city of Zagreb)	0	0	n.a.	No discount is mentioned for persons with disabilities.	Pleso Prijevoz website, FAQ, available at: link ; Policy and Tickets, available at: link .
	Total costs for a trip of 5-days	11.5	8.3			
	Standard bus fare in the city of Tallinn	2.0	2.0	n.a.	100% discount, only available if the person holds a transport card or the national disability card/certificate; the assistant also receives a	Website for travel in Tallinn. Available at: link .

MS	Activity	Savings for person with disabilities (EUR)	Savings for personal assistant (EUR)	Km	Notes	Sources
					100% discount, without need to show a document	
	Short distance trip by train (Tallinn to Saue)	2.0	2.0	20	100% discount, only available if the person holds a transport card or the national disability card/certificate; the assistant also receives a 100% discount, without need to show a document	Elron website. Available at: link .
EE	Medium distance trip by train (Tallinn to Tartu)	10.0	10.0	182	100% discount, only available if the person holds a transport card or the national disability card/certificate; the assistant also receives a 100% discount, without need to show a document	Elron website. Available at: link .
	Medium distance trip by bus (Tallinn to Tartu)	12.0	12.0	182	100% discount, only available if the person holds a transport card or the national disability card/certificate; the assistant also receives a 100% discount, without need to show a document	LuxExpress website. Available at: link .
	Long distance trip by train (Tallinn to Valga)	16.2	16.2	234	100% discount, only available if the person holds a transport card or the national disability card/certificate; the assistant also receives a 100% discount, without need to show a document	Elron website. Available at: link .
	Transfer to the airport (from Tallinn, by tram)	2.0	2.0	n.a.	100% discount, only available if the person holds a transport card or the national disability card/certificate; the assistant does not need to prove anything.	Website for travel in Tallinn. Available at: link .
	Total costs for a trip of 5-days	36.7	36.7			
FR	Standard bus fare in the city of Paris	2.1	2.1	n.a.	100% discount. Depending on the disability, the assistant may also receive a 50% discount	Ratp website. Available at: link .
	Short distance trip by train (Val de Reuil to Vernon)	0	4.2	15	50% discount for personal assistants	SnCF website. Available at: link .
	Medium distance trip by train (Paris to Le Havre)	0	21.1	190	50% discount for personal assistants	SnCF website. Available at: link .
	Long distance trip by Bus (Paris to Lyon)	0	35.0	500	The trip is free for personal assistants if the card specifies	FlixBus website.

MS	Activity	Savings for person with disabilities (EUR)	Savings for personal assistant (EUR)	Km	Notes	Sources
					the person with disabilities needs to be accompanied	Available at: link .
	Long distance trip by train (Paris to Marseilles)	0	62.5	770	50% discount for an assistant	SnCF website. Available at: link .
	Transfer to airport (Paris CDG)	0	5.7	n.a.	50% discount or free for an assistant, PwD pays full price	Ratp website. Available at: link .
	Total costs for a trip of 5-days	€21.0	€61.1			
DE	Standard bus fare in city Berlin	3.0	3.0	n.a.	100% discount for persons with severe disability and their assistant if have a specific card (<i>Schwerbehindertenausweis</i>)	Official Website of Berlin. Available at: link .
	Short distance trip by train (Berlin to Potsdam)	4.0	0	38	100% discount for persons with severe disability who hold a specific card (<i>Schwerbehindertenausweis</i>)	Deutsche Bahn website. Available at: link .
	Medium distance trip by train (Berlin to Brandenburg)	7.9	0	83	100% discount for persons with severe disability who hold a specific card (<i>Schwerbehindertenausweis</i>)	Deutsche Bahn website. Available at: link .
	Medium distance trip by bus (Munich to Nuremberg)	0	13.0	170	Free for personal assistants if the person with disability has a disability card or medical certificate	FlixBus Policy and Tickets
	Long distance trip by train (Berlin to Bremen)	59.9	0	395	100% discount for persons with severe disability who hold a specific card (<i>Schwerbehindertenausweis</i>)	Deutsche Bahn website. Available at: link .
	Berlin to airport	4	0	30	100% discount for persons with severe disability who hold a specific card (<i>Schwerbehindertenausweis</i>)	Deutsche Bahn website. Available at: link .
	Total costs for a trip of 5-days	32.6	51.7			
	Standard bus fare in the city of Budapest	0.94	0.94	n.a.	Free local transport for persons with disabilities and personal assistants	BKK website, persons with physical impairments, available at: link ; prices, available at: link .
	72 hours travel card in the city of Budapest	15	15	n.a.	Free local transport for PwD and personal assistants	BKK website, persons with physical impairments, available at:

MS	Activity	Savings for person with disabilities (EUR)	Savings for personal assistant (EUR)	Km	Notes	Sources
HU						link ; prices, available at: link .
	Short distance by train (Budapest to Visegrad)	2.9	2.9	40	90% discount on regional transport	BKK website, persons with physical impairments, available at: link ; prices, available at: link .
	Medium distance by train (Budapest to Szolnok)	4.5	4.5	111	90% discount	BKK website, persons with physical impairments, available at: link ; prices, available at: link .
	Long distance by train (Budapest to Debrecen)	10.79	0	221	90% discount	BKK website, persons with physical impairments, available at: link ; prices, available at: link .
	Transfer to airport (Budapest)	5.9	5.9	n.a.	Free local transport for persons with disabilities and personal assistants	BKK website, persons with physical impairments, available at: link . Budapest airport website, available at: link .
	Total costs for a trip of 5-days	41.7	39.6		All values for Hungary are converted in EUR using the current exchange rate	
	Standard bus fare in the city of Dublin	2.0	2.0	n.a.		Transport for Ireland website. Available at: link .
Short distance by train (Dublin to Newbridge)	10.9	10.9	46	100% discount, but the person needs to be a Free Travel Pass holder	Irishrail website. Available at: link .	
Medium distance by bus (Dublin to Limerick)	28.0	28.0	195	The provider accepts the Free Travel Pass for persons with	Citylink website.	

MS	Activity	Savings for person with disabilities (EUR)	Savings for personal assistant (EUR)	Km	Notes	Sources
IE					disabilities, and refers to the Free Travel Scheme	Available at: link .
	Medium distance by train (Dublin to Limerick)	34.1	34.1	195	100% discount, but the person needs to be a Free Travel Pass holder	Irishrail website. Available at: link .
	Long distance train (Dublin to Killarney)	34.0	34.0	308	100% discount, but the person needs to be a Free Travel Pass holder	Irishrail website. Available at: link .
	Transfer to airport (Dublin)	7	7	15		Dublin Airport website, help & support, available at: link . DublinExpress website, available at: link .
	Total savings for a trip of 5-days	78.0	78.0			
IT	Standard bus fare in the city of Bergamo	0	0	n.a.	No explicit mention of a preferential tariff for persons with disabilities.	ATB Trasporti Bergamo website. Available at: link .
	Standard bus fare in the city of Rome	0	0		Discounts only for Rome residents depending on taxable income; also, only available on annual subscription.	ATAC Roma website. Available at: link .
	Standard bus fare in the city of Trento	0	0	n.a.	Free travel only for Trento residents.	Trentino Trasporti. Available at: link .
	Medium distance by train (Bergamo to Lake Garda)	0	0	90	Travel discounts for persons with disabilities are only for legal residents of the region, a disability card per se does not appear to be enough.	Regione Lombardia Tariffa Agevolata. Available at: link .
	Medium distance by train (Bergamo to Verona)	8.0	40.0	120	20% discount or free travel on same train for the accompanying person, assumed for a EUR 40 ticket.	Trenitalia website. Available at: link .
	Medium distance by bus (Milan to Turin)	0	15.0	145	Free travel for accompanying person and/or pet, average price of a ticket bought the day before.	Flixbus Italy website. Available at: link .

MS	Activity	Savings for person with disabilities (EUR)	Savings for personal assistant (EUR)	Km	Notes	Sources
	Long distance by train (Milan to Rome)	0	0	500	No mention of free travel or discounts for persons with disability or personal assistants. There are only discounts for seniors. There are preferential conditions, but related to service, and help in reserving seats.	Italo website, Policy, available at: link ; Offers, available at: link .
	Transfer to Bergamo Airport by bus	0	0	5	No explicit mention of a preferential tariff for persons with disabilities.	ATB Trasporti Bergamo website. Available at: link .
	Total savings for a trip of 5-days	2.0	13.8			
RO	Standard bus fare in the city of Bucharest	0.6	0.6	n.a.		Stbsa website. Available at: link .
	Short distance trip by train (Bucharest to Fundulea)	4.2	4.2	42		CFR Călători website. Available at: link .
	Medium distance trip by train (Bucharest to Giurgiu)	3.8	3.8	115		CFR Călători website. Available at: link .
	Long distance trip by train (Bucharest to Oradea)	30.0	30.0	649		CFR Călători website. Available at: link .
	Transfer to airport (Bucharest)	2.9	2.9	n.a.		CFR Călători website. Available at: link .
	Total savings for a trip of 5-days	28.1	28.1		All values for Romania are converted in EUR using the current exchange rate	
	Standard bus fare in the city of Barcelona	0	2.4	n.a.	There is no tariff for persons with disabilities for 1 journey; assistants need to have a special card in order to travel for free	Tmb website. Available at: link .
	10 journey pass in city Barcelona	9.4	11.4	n.a.	The pass costs EUR 2 for persons with disabilities; accompanying persons need to have a specific card in order to receive the discount	Tmb website. Available at: link .
	Short distance trip by train (Madrid to Fuenlabrada)	1.3	1.3	27	25% discount; discount only provided with the Tarjeta Dourada card; the assistant	Venta website. Available at: link .

MS	Activity	Savings for person with disabilities (EUR)	Savings for personal assistant (EUR)	Km	Notes	Sources
ES					receives the same discount if the person has a 65% or greater disability.	
	Medium distance trip by train (Madrid to Toledo)	2.8	2.8	73	25% discount; discount only provided with the Tarjeta Dourada card; the assistant receives the same discount if the person has a 65% or greater disability.	Venta website. Available at: link .
	Medium distance trip by train (Madrid to Jaen)	14.6	14.6	310	40% discount; discount only provided with the Tarjeta Dourada card; the assistant receives the same discount if the person has a 65% or greater disability.	Venta website. Available at: link .
	Medium distance trip by bus (Madrid to Quintana del Puente)	0.0	55.0	252	Free for accompanying person	Flixbus Policy and Tickets
	Long distance trip by train (Madrid to Barcelona)	20.1	20.1	613	25% discount; discount only provided with the Tarjeta Dourada card; the assistant receives the same discount if the person has a 65% or greater disability.	Venta website. Available at: link .
	Long distance trip by bus (Madrid to Barcelona)	6.0	6.0	613	15% discount for those with a 33% disability and more; same applies to the assistants except if the disability is intellectual or developmental (in that case the assistant travels for free)	Alsa website. Available at: link .
	Trip to Madrid airport by Train	0.5	0	n.a.	20% discount for the person with disability, no mention of the special assistant	Crtm website. Available at: link .
	Total savings for a trip of 5-days	30.8	44.2			

Source: Authors' elaboration based on desk research

Calculation of costs estimates of a digital EDC

Both policy options A1 and A2 see the introduction of a digital version of the European Disability Card in parallel to a physical one. In line with the current developments in the area of digitalisation of other cards, licences and certificates ongoing on the EU level, the digital EDC would be based on ISO18013-5 and eIDAS features.

In the Commission Staff Working Document²⁹⁹ accompanying a proposal for a Directive on driving licences, the cost of creating an IT system for the introduction of EU mobile driving

²⁹⁹ [SWD\(2023\) 128 final](#)

licences is estimated to be around EUR 12.9 million in one-off costs and ca EUR 1.9 million on recurring costs for maintaining the system on a yearly basis once it is developed.³⁰⁰

As the volumes of driving licences issued in the EU are much higher than the estimated number of people with disabilities, there is a need to adjust these estimated costs.

To this end, the calculation of estimated costs needed to build an IT system from scratch for a digital EDC comprised of two steps:

- 1) The estimated one-off and recurring costs for digital driving licences per driving licence were calculated, as seen in the table below:

Table 48 - IT system cost per digital driving licence

Digital driving licences	One-off costs	Recurring annual maintenance costs
Total EU27	EUR 12,927,816	EUR 1,939,172
Number of driving licences	250,000,000	250,000,000
Cost per driving licence	EUR 0.05171	EUR 0.00776

- 2) The one-off and recurring costs per digital driving licences were then multiplied by the number of persons reporting "severe" limitations in usual activities³⁰¹ to receive an estimate of one-off and recurring annual maintenance costs for digital European Disability Card.

Table 49 - Estimated IT system cost for digital European Disability Card

	One-off costs	Recurring annual maintenance costs
Cost per licence	EUR 0.05171	EUR 0.00776
Estimated number of persons reporting "severe" limitations in usual activities	32,198,939	32,198,939
Estimated total EU27 for persons reporting "severe" limitations in usual activities	EUR 1,665,047.84	EUR 249,757.12

As calculated in the table above, the one-off costs to build an IT system for digital EDC are estimated to be EUR 1.67 million with recurring maintenance costs estimated at EUR 249,757 per year.

Final ranking matrix

Following the assessment of the policy options through the MCDA, in Section 8 of the Final report the options are compared based on their total scores through a final ranking matrix. In this matrix, the sums of the weights for all criteria in relation to which a given policy option performs better than other policy options are indicated. The outranking matrix follows the example of Table below.

³⁰⁰ [SWD\(2023\) 128 final, pp. 106-108](#)

³⁰¹ The calculation used "Estimated number of persons reporting "severe" limitations in usual activities" (i.e., 32,198,939 person) from EU SILC data as not all MS publish the number of persons with recognised disabilities. As per Table 5 of the Study supporting the impact assessment of an EU initiative introducing the European Disability Card, the numbers obtained in the EU SILC for persons reporting "severe" limitations are comparable for with the numbers of persons with disabilities in those Member States that publish these data. Therefore, the calculations above are made with the assumption that the EU SILC data provide a representative figure of persons with disabilities across the EU.

Table 50 – Illustrative final ranking matrix

Policy option	Direction	Score
Baseline	+/-	0
Policy option 1	+	5
Policy option 2	+	11

Source: Authors' elaboration based on the BRG

The practical application of the matrix can be found in the core Final report. The outranking matrix provides a clear overview of which policy option is most favourable, second-most favourable, etc.

Annex IV – Competitiveness check

Overview of impacts on competitiveness

The impacts of policy options A2 and B2 on competitiveness and SMEs are analysed in the dedicated parts of the MCDA in Section 7 of the Final report. For both options, these impacts are deemed to be small, and mainly occurring through the same channel: the increase in persons with disabilities travelling affecting the market for accessible tourism in Europe. Like for the wider tourism sector, many SMEs operate in this market³⁰² and they would be positively impacted by the increased travel flows of persons with disabilities from other Member States.

Table 51 – Overview of impacts on competitiveness – Preferred Options

Dimensions of Competitiveness	Impact of the initiative (++ / + / 0 / - / -- / n.a.)	References to sub-sections of the main report or annexes	Comment
Cost and price competitiveness	0	Sections 7.3 (Table 19), 7.4 (Table 21)	<p>The cost for service providers to offer preferential conditions to persons with disabilities from other Member States is considered to be negligible given the small proportion they represent of the client base (less than 1% for the majority of respondents to the targeted survey), as service providers have a large majority of their clients from both nationals and tourists. Furthermore, this cost is partially offset by the paying customers accompanying persons with disabilities: in the targeted survey for service providers, 16 out of 23 respondents declared that persons with disabilities are accompanied, on average, by at least one person fully paying for the organisation's services.³⁰³ This cost is estimated at:</p> <ul style="list-style-type: none"> - 254 and 353 million EUR yearly for A2. - roughly 40 million EUR to 55 million EUR yearly for B2 <p>These are yearly costs for the whole EU. Given the number, size, turnover of service providers in the EU in the affected sectors, these costs are</p>

³⁰² World Tourism Organization (UNWTO, Madrid, 2018), European Union Tourism Trends: "EU destinations counted 608 thousand accommodation establishments in 2016, mostly small and medium-sized enterprises (SMEs)". Available at: [link](#).

³⁰³ Survey on costs targeted at service providers, Q8 and Q9 (See Annex VII).

Dimensions of Competitiveness	Impact of the initiative (++ / + / 0 / - / -- / n.a.)	References to subsections of the main report or annexes	Comment
			practically negligible and are unlikely to reflect into prices.
International competitiveness	0	Sections 7.3 (Table 19), 7.4 (Table 21)	<p>Given the nature of the policy, the options would not put at any disadvantage EU firms relative to firms outside the EU, as the tourism sector is naturally a domestic sector, and, as such, all firms would be in the same situation. Moreover, the preferred policy options are expected to be beneficial in terms of international competitiveness, by decreasing uncertainty for costumers with disability, as well as costs and uncertainty for service providers regarding the validity of the different national IDs. By removing barriers to the mobility of persons with disabilities travelling to different Member States, the policy options can be expected to make the accessible tourism market more competitive, with companies in the sector striving to attract tourists with disabilities.</p> <p>In terms of attractiveness for international tourists, as explained above, the policy options are not expected to translate into higher prices, given the low overall costs. As such, this will not discourage non-EU tourists.</p>
Capacity to innovate	0	Sections 7.3 (Table 19), 7.4 (Table 21)	No significant effect is expected in terms of capacity to innovate, as this is not strictly related to neither of the preferred policy options
SME competitiveness	0	Sections 7.3 (Table 19), 7.4 (Table 21)	SME competitiveness is not expected to be significantly impacted relative to other business.

Synthetic assessment

The preferred policy option is not expected to have significant impacts on competitiveness, nor particularly negative effects on small and medium enterprises. The policy option is likely to provide a boost in international competitiveness for business operating in the tourism sector, through an increase in the travel propensity of persons with disabilities from other Member States. On the one hand, the cost of offering preferential conditions to these costumers is minor both in terms of the direct cost and relative to the proportion of these costumers in the client base. Moreover, as most service providers report that persons with disabilities are often accompanied by paying costumers (who are not the personal assistants), the direct cost of the preferential condition might be offset immediately by higher turnover. The costs are not higher for SMEs, while the benefits could be higher, as these businesses are particularly concentrated in the tourism sector.

Annex V – Evidence feeding problem definition

Implementation analysis of the EU Parking Card for persons with disabilities

Objectives and scope of the EU parking card

The EU parking card for persons with disabilities (hereinafter referred to as “EU parking card”), also known as “Blue Badge”, was introduced in 1998 by Council Recommendation 98/376/EC,³⁰⁴ as amended by Council Recommendation 2008/205/EC.³⁰⁵

CR 98/376/EC provides for a standardised model of EU parking card with a view of ensuring its mutual recognition across the Member States, hence facilitating the free movement of persons with disabilities by car (see the Box below).

Box 7 – Council Recommendation 98/376/EC: Preamble 3

Whereas a mode of transport other than public transport constitutes, for many persons with disabilities, the only means of getting about independently for purposes of occupational and social integration; whereas, in certain circumstances and with due regard to road safety, it is only right that persons with disabilities should be enabled, by means of a parking card for such people, to park as near to their destination as possible; whereas persons with disabilities should thus have the opportunity to avail themselves of the facilities provided by the said parking card throughout the Community in accordance with the national rules applying in the country in which they happen to be.

Source: Council Recommendation 98/376/EC

The EU parking card provides for various parking concessions, including free parking, extended parking, or reserved parking spaces, as established by Member States’ specific provision of law. In particular, Art. 3 gives some indications on who should be entitled to the EU parking card, recommending the Member States to grant it ‘to people whose disability leads to reduced mobility’.³⁰⁶ The introduction of an EU standardised model of the EU parking card guarantees that persons entitled to certain parking rights in their Member State can benefit from such advantages also in another Member State where they decide to travel.³⁰⁷ In this sense, the Recommendation also foresees that full information on the conditions for using the EU parking card in the Member States should be provided to cardholders.³⁰⁸ In particular, Art. 4 states recommends the Member States to cardholders.³⁰⁹ In particular, Art. 4 recommends Member States to ‘provide, on the basis of a technical fact sheet prepared by the Commission, an overview of the conditions of use in the different Member States of the European Union when issuing a parking card to persons with disabilities and at the request of the persons concerned’.³¹⁰ Moreover, the EU parking card is issued to a named person with recognised disability status, rather than to a specific vehicle, so it is transferable to any vehicle the person may be using.³¹¹

Specifically, the standardised model set out by Council Recommendation 98/376/EC details the dimensions, format and layout, which should make the card easily identifiable across the Member States, with the most recognisable component being the international disability symbol

³⁰⁴ 98/376/EC: Council Recommendation of 4 June 1998 on a parking card for people with disabilities. Available at: [link](#).

³⁰⁵ Council Recommendation of 3 March 2008 adapting Recommendation 98/376/EC on a parking card for people with disabilities, by reason of the accession of the Republic of Bulgaria, the Czech Republic, the Republic of Estonia, the Republic of Cyprus, the Republic of Latvia, the Republic of Lithuania, the Republic of Hungary, the Republic of Malta, the Republic of Poland, Romania, the Republic of Slovenia and the Slovak Republic. Available at: [link](#).

³⁰⁶ 98/376/EC: Council Recommendation of 4 June 1998 on a parking card for people with disabilities. Available at: [link](#).

³⁰⁷ Muñoz, E., Serrano, M., Marqués, A., Ferreras, A., & Solaz, J. (2016, June). SIMON: an ICT proposal for the mobility impaired citizens. In *11th ITS European Congress, Glasgow, Scotland* (pp. 6-9).

³⁰⁸ 98/376/EC: Council Recommendation of 4 June 1998 on a parking card for people with disabilities. Available at: [link](#).

³⁰⁹ 98/376/EC: Council Recommendation of 4 June 1998 on a parking card for people with disabilities. Available at: [link](#).

³¹⁰ Ibid.

³¹¹ European Parliament (2022), Disability assessment, mutual recognition and the EU Disability Card - Progress and opportunities. Available at: [link](#).

representing a wheelchair.³¹² The Annex to Council Recommendation 98/376/EC entitled “Provisions on the Community-model parking card for people with disabilities” provides for further details, in particular with regard to card’s height, width, colour, material (plastic-coated), the elements that shall be contained (e.g. the wheelchair symbol, the expiry date, serial number, specification on the issuing authority, the words “Parking card for people with disability” in national language and the words “Parking card” in other EU languages, the holder’s personal information, signature and photo, specific statements, etc.) and where these elements are to be displayed.³¹³ Moreover, in its preamble, the Recommendation also foresees that the Member States should introduce security features to prevent forgery or counterfeiting of the parking card.³¹⁴

How successful was the Recommendation on the EU parking card in ensuring its mutual recognition across the Member States and facilitating the free movement of persons with disabilities in the EU

Since the adoption of Council Recommendation 98/376/EC in 1998, **the EU model parking card has been adopted in - and is widely used by - all the Member States**, as demonstrated by the number of valid cards in place (see Table 52 for a general overview on the number of valid EU parking cards or the cards issued in a given year and see Figure below for a comparison among the number of valid cards in some of the Member States) as well as by stakeholders consulted during the study largely agreed to be aware of the card³¹⁵ and to make use of it.³¹⁶

³¹² Ibid.

³¹³ Muñoz, E., Serrano, M., Vivó, M., Marqués, A., Ferreras, A., & Solaz, J. (2016). SIMON: assisted mobility for older and impaired users. *Transportation research procedia*, 14, 4420-4429.

³¹⁴ 98/376/EC: Council Recommendation of 4 June 1998 on a parking card for people with disabilities. Available at: [link](#).

³¹⁵ Survey targeted at PwDs Q3.1 (See Annex VII); PC: Respondents to the easy-to-read questionnaire Q13 and standard questionnaire QB1 (See Annex VIII).

³¹⁶ Survey targeted at PwDs Q1.6, Q3.2 (See Annex VII); PC: Respondents to the easy-to-read questionnaire Q14 and Q15 and standard questionnaire QB2 (See Annex VIII).

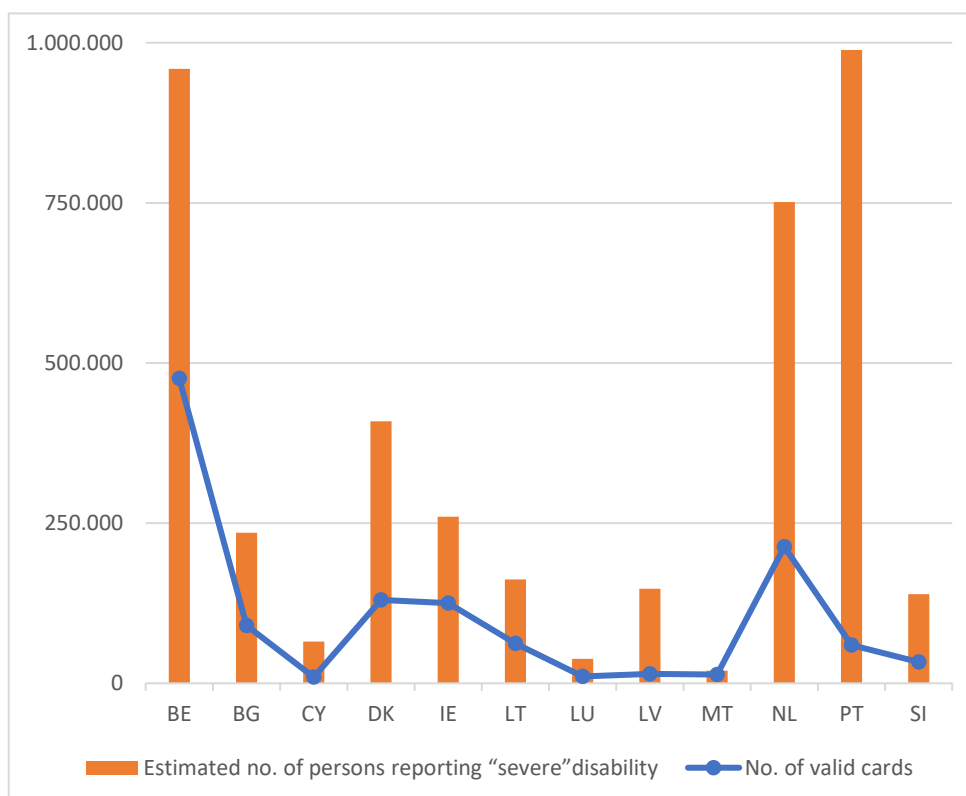
Table 52 – Number of existing EU parking cards per Member State

MS³¹⁷	Number of cards	Notes
AT	<ul style="list-style-type: none"> 2022: 100,000 	<ul style="list-style-type: none"> Issued since 1 January 2014
BE	<ul style="list-style-type: none"> 2023: 476,114 	
BG	<ul style="list-style-type: none"> 2023: 89,996 	
CY	<ul style="list-style-type: none"> 2023: 9,628 	
DK	<ul style="list-style-type: none"> 2023: 130,000 	
FI	<ul style="list-style-type: none"> 2018: 14,926 2019: 15,342 2020: 14,221 2021: 14,809 2022: 17,450 	<ul style="list-style-type: none"> Cards issued in years 2018-2022
FR	<ul style="list-style-type: none"> 2017-2018: 630,000 	<ul style="list-style-type: none"> Cards issued between 1 Jan 2017 and 1 February 2019
IE	<ul style="list-style-type: none"> 2022: 125,000 	
LT	<ul style="list-style-type: none"> 2023: 61,953 	<ul style="list-style-type: none"> N. of cardholders in the period of 01/01/2010 - 31/12/2022
LU	<ul style="list-style-type: none"> 2023: 10,853 	
LV	<ul style="list-style-type: none"> 2023: 14,540 	
MT	<ul style="list-style-type: none"> 2017: 9,752 2019: 10,589 2020: 8,485 2021: 11,239 2022: 13,299 2023: 13,552 	
NL	<ul style="list-style-type: none"> 2023: 213,251 	
PL	<ul style="list-style-type: none"> 2022: 277,838 	<ul style="list-style-type: none"> Unit of measurement not specified
PT	<ul style="list-style-type: none"> 2023: 59,514 	
SE	<ul style="list-style-type: none"> 2013-2022: 21,933 	<ul style="list-style-type: none"> Number of cards issued in Stockholm in years 2013-2022
SI	<ul style="list-style-type: none"> 2019: 26,763 2023: 33,291 	

Source: Author's own elaboration

³¹⁷ CZ, DE, EE, EL, ES, HR, HU, IT, RO, SK: no data available.

Figure 12 – Number of valid EU parking cards per Member State compared to the estimated no. of persons reporting “severe” disability³¹⁸



Source: Authors’ own elaboration based on EUROSTAT data and on data collection conducted at the Member State level

Overall, **the adoption of a common EU model has improved the mutual recognition of the card across the Member States,³²⁰ hence facilitating the free movement of persons with disabilities** across the Member States³²¹ Consistently, a survey conducted by the European Disability Forum (EDF) in 2020 pointed to the EU parking card as one of the most practical and visible EU initiatives on disability issues. Specifically, the EDF survey confirmed that the EU parking card is mutually recognised across the Member States, making travelling abroad easier.³²² In this respect, the majority per persons with disabilities consulted during the study declared to use the EU parking card abroad³²³ and agreed that the card facilitates travels to other Member States.³²⁴

Yet, **the EU parking card presents some shortcomings due to the fact that it stems from a provision issued 25 years ago that has so far not been updated and also to its legal nature**, i.e. a Recommendation which is not binding by nature, thus providing for minimum harmonisation across the Member States.³²⁵ In line with the principle of subsidiarity, disability

³¹⁸ Section 0 provides data limited to twelve Member States as data collected through desk research and consultation activities on the no. of persons with disabilities holding the EU parking card is not consistent and hardly comparable across the remaining Member States.

³¹⁹ Eurostat database, hlth_silc_12. Available at: [link](#).

³²⁰ Survey targeted at NCAs Q3.2- Ensuring mutual recognition of the card across Member States; Survey targeted at other PAs Q3.2; Survey targeted at EU-level CSOs Q3.1; Survey targeted at national CSOs Q3.2 (See annex VII).

³²¹ Preliminary results (based on responses to the standard questionnaire received until 3 April 2023) of Public Consultation QB3.

³²² EDF recommendations for strengthening the EU Parking Card 2020. Available at: [link](#).

³²³ Survey targeted at PwDs Q3.2 - Yes, I use it both in my country and in other Member States or Yes, I use it in other Member States (See annex VII).

³²⁴ Survey targeted at PwDs Q3.3 (See annex VII).

³²⁵ EDF recommendations for strengthening the EU Parking Card 2020. Available at: [link](#).

policies are mainly competence of the Member States. Hence, national authorities are free to establish their own provisions for the functioning of the EU parking card. More specifically, each Member State can determine the eligibility criteria for obtaining the card (the disability assessment), the management system in place and the issuing authority, which may be local or central, as well as any further elements to be added in the card layout.

In addition, the Recommendation does not contain provisions on coordination and monitoring of Member States. As a consequence, there is little indication of coordination and monitoring actions in recent years to improve harmonisation across the Member States.³²⁶ The lack of common actions for the coordination and monitoring of the EU parking card across the Member States and the margin of discretion allowed by the Recommendation have resulted in differences across the Member States with regard to the EU parking card's design, issuing and enforcement rules. In turn, even if the EU parking card is widely used and generally recognized across the Member States, such differences result in some barriers for persons with disabilities in using the card when travelling to another Member State.³²⁷

With respect to the disability assessment, the **Member States have different rules in place regarding the eligibility criteria** for obtaining the EU parking card. Persons with disabilities are often considered as part of a single homogeneous group, even if in reality they constitute a heterogeneous group of people that differ in age and lifestyles, physical and mental characteristics, or travel patterns and transport needs.³²⁸ Given that there is not a definite and shared definition of disability, the Member States apply different criteria to identify who is eligible to obtain the EU parking card (see Table below Table 53). For instance, in some Member States, the EU parking card is available to everyone who has a national disability card, or who appears on a national disability register³²⁹ (e.g. RO), thus the eligibility criteria for the EU parking card are more broadly interpreted and do not concern only mobility impairments. In other cases, the EU parking card is issued to recipients of disability pensions/benefits, or following a specific need assessment (e.g. as part of an assessment for long-term social care/support). In most cases, as shown in the table below, the EU parking card is granted to persons with a disability that implies reduced mobility or impaired vision. Indeed, Art. 3 of the Recommendation suggests that the EU parking card should be granted to a person with a disability that leads to reduced mobility.³³⁰

Table 53 – Member States' different eligibility criteria for obtaining the EU parking card³³¹

Model	AT	BE	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IE	IT	LT	LU	LV	MT	NL	PL	PT	RO	SE	SI	SK
Reduced mobility		✓	✓					✓		✓	✓	✓	✓	✓		✓	✓		✓			✓		✓	✓		
Impaired vision	✓		✓	✓		✓		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓				✓	✓		✓	
Severe disabilities		✓	✓	✓	✓	✓	✓		✓					✓	✓		✓	✓		✓			✓		✓	✓	✓
Intellectual and non-physical disabilities	✓			✓					✓					✓					✓				✓			✓	
Mobility restriction	✓					✓												✓		✓	✓						

Source: Author's own elaboration based on desk research

Different eligibility criteria result in different treatment depending on the country of origin across the Member States, thus causing confusion and frustration to persons with disabilities as regards their (mobility and related) rights. In this respect, as also stated by a

³²⁶ The last Commission request for information to Member States on the implementation of the EU parking card dates from 2019 and was discussed in the High Level Group on Disability in 2019.

³²⁷ Do not take my spot! – The EU Disability Parking Card. Available at: [link](#).

³²⁸ Muñoz, E., Serrano, M., Marqués, A., Ferreras, A., & Solaz, J. (2016, June). SIMON: an ICT proposal for the mobility impaired citizens. In *11th ITS European Congress, Glasgow, Scotland* (pp. 6-9).

³²⁹ European Parliament (2022) Disability assessment, mutual recognition and the EU Disability Card - Progress and opportunities. Available at: [link](#).

³³⁰ 98/376/EC: Council Recommendation of 4 June 1998 on a parking card for people with disabilities. Available at: [link](#).

³³¹ With 'severe disability' is meant amputation of limbs, severe mobility impairment, blindness, etc.

Member of the European Parliament during the event "Do not take my spot! – The European Disability Parking Card", the fact that the EU parking card is issued not only to persons with reduced mobility but also to persons with other types of disabilities (e.g. mental disabilities) raises confusion about the use of the EU parking card.³³² In this respect, a representative from an EU-level parking association interviewed during the study claimed that, when using the EU parking card, persons with non-visible disabilities (e.g. dementia) often face questions from controllers, bystanders and persons with physical disabilities, complaining that the parking spot is taken by persons with no physical issues that are still fit to easily access to premises.³³³

Moreover, the Member States have **different systems in place for the management of the EU parking card**. Indeed, the EU parking card can be issued either by a centralised, decentralised or mixed (authority management system) model, depending on whether the designated authority deciding on the eligibility and responsible for the issuance is national or local. In general, the Member States with a larger population (DE, ES, IT, RO) tend to adopt a decentralised system, which could be considered more efficient to process a larger number of cards, while those with a smaller population (AT, BE, CY, DK, IE, LU, LV, MT) generally adopt a centralised system.³³⁴ The centralised model is typically linked with lower risk of frauds and forgeries as compared to a decentralised model.³³⁵ Indeed, centralisation of responsibilities allows greater efficiency in terms of both issuing procedures and enforcement capacity against misuse of the card, including checks on the card validity.

In order to get both advantages linked with the centralised and decentralised model, some Member States (EE, EL, FI, FR, HU, LT, SI) have decided to adopt a mixed model, where the authority responsible for the physical issuance and delivery of the card and the authority in charge of the eligibility assessment are identified either at the central or the local levels. The mixed model has also led to better control on the uniform implementation of the entitlement criteria, issuance by specialised bodies and implementation of national databases with national cards number, compared to the decentralised model.³³⁶ Table 54 below provides an overview of different management systems in place across the Member States.

Table 54 – EU parking card management systems

Model	AT	BE	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IE	IT	LT	LU	LV	MT	NL	PL	PT	RO	SE	SI	SK
Centralised	✓	✓		✓			✓								✓			✓	✓	✓		✓	✓				
Decentralised			✓		✓	✓				✓			✓			✓					✓				✓	✓	✓
Mixed								✓	✓		✓	✓		✓			✓									✓	

Source: Author's own elaboration based on desk research

Regarding the mixed model, Table 55 below illustrates different approaches adopted across Member States.

Table 55 – EU parking card mixed management systems

Type of authority	EE	EL	FI	FR	HU	LT	SI
Eligibility assessment	Local	Central	Local	Local	Local	Local	Central
Card issuance	Central	Local	Central	Central	Central	Central	Local

Source: Author's own elaboration based on desk research

Differences in the design and in the validity period of EU parking cards issued in the different Member States are also present. Annex I to the Recommendation provides for minimum standards in terms of design and layout of the EU parking card, but the technological progress since 1998 and the non-binding nature of the provision have resulted in increasing differences

³³² Do not take my spot! – The EU Disability Parking Card. Available at: [link](#).

³³³ Targeted interview with one EU Parking association (#3).

³³⁴ European Commission (2019) Parking card for persons with disabilities - Updated overview (shared by EC, not published).

³³⁵ Minutes from the EU Disability High Level Group meeting 14 May 2019 – 9.30 to 16.30. Available at: [link](#).

³³⁶ European Commission (2019) Parking card for persons with disabilities - Updated overview (shared by EC, not published).

in the design of the cards issued by the Member States, reinforced by a lack of coordination among the Member States. Differences in the layout of the EU parking card sometimes even occur also within a single Member State, when the card is issued at the local level (e.g. if the logo of the municipality is included).³³⁷ A respondent from the study survey targeted at national Civil Society Organisations (CSOs) included as an issue that affects to a high extent the implementation of the EU parking card the fact that some of the Member States have different parking card models even in their own regions.³³⁸ A further element of complexity is the coexistence of older and newer models of cards. For example, since 2017, in France the EU-model parking card is progressively being replaced by a new non-EU model parking card, i.e. the CMI ('Carte mobilité inclusion'), yet both models are currently valid and in use.

The table below provides some examples of national differences regarding the EU parking card.

Table 56 – Examples of additional features with respect to the standard EU-model parking card

Additional security feature	AT	BE	DK	ES	FI	IE	IT	MT	NL	PL	SE	SK
Barcode					✓	✓					✓	
Hologram		✓	✓	✓	✓		✓	✓	✓	✓	✓	✓
QR code		✓	✓	✓								
NCF ('Near field communication') tag for wireless detection				✓								
Unique number (national or regional)		✓		✓								
Anti-copying paper	✓							✓				✓

Source: Author's own elaboration based on desk research

Member States have added these features, not originally foreseen in the Recommendation, in order to better prevent frauds and forgeries.³³⁹ Frauds consist in the use of a parking card of someone else, including a deceased person, or in using both a duplicate card and the original one at the same time. In order to tackle this kind of fraud, Belgium added a QR code in the EU parking card that can be scanned through an app ('Handi2park') used by the police to check their validity. Until the end of January 2019, 71,219 EU parking cards had been checked using Handi2park and in almost 10% of the cases there appeared to be a misuse of the EU parking card. Most of the times, the EU parking card of a deceased person was used, or the original card was still used even if a duplicate had been issued.

With respect to forgeries, these occur when a copy of the EU parking card belonging to someone else is used or when the rightful owner makes copies of the EU parking card to use it on more than one vehicle simultaneously. Holograms are expressly included on EU parking cards issued in Italy, Malta, Slovakia and Sweden to make sure that copies of the card are recognisable, preventing possible forgeries. For example, in Malta, in 2022, 110 cards in the car park of an important hospital were found to be copies. Also in Sweden, a barcode and hologram have been introduced as copied cards were commonly found to be used in vehicles.

In other countries, no additional features are present on the EU parking card compared to the standard model set out in Annex I to the Recommendation, but other actions against fraud and forgery have been implemented. For example, in Greece, the Hellenic Police operated a special traffic policing operational programme, called "Free movement of citizens in cities", from September 2019 to September 2020. Each month, violations related to parking on spaces reserved to persons with disabilities were recorded and the number of violations dropped from 9,531 (period September-November 2019) to 1,868 (period September 2020).

Differences in the layout and design of the EU parking card across the Member States may reduce the degree of mutual recognition. Indeed, while the visual format is still easy to recognise thanks to the international disability symbol representing a wheelchair, the text displayed on the EU parking card is usually printed in the national language of the Member State where the card is issued, and the physical dimension does not allow for the inclusion of text in

³³⁷ Do not take my spot! – The EU Disability Parking Card. Available at: [link](#).

³³⁸ Survey targeted at national CSOs Q3.6 (See annex VII).

³³⁹ Minutes from the EU Disability High-Level Group meeting 14 May 2019 – 9.30 to 16.30. Available at: [link](#).

multiple languages. Therefore, its meaning is not immediately clear to local authorities or service providers of other Member States where the card is used, unless they can understand the text written in a foreign language.³⁴⁰

Several respondents to the online surveys confirmed that national differences in terms of validity period³⁴¹ and design³⁴² hinder the mutual recognition of the card, thus negatively affecting its implementation across the Member States. Moreover, 7 out of 8 CSOs and 14 out of 19 NCAs participating in the study workshops claimed that national differences in terms of design and functioning of the EU parking card hinder its mutual recognition across the Member States.³⁴³ Furthermore, 3 out of 15 persons with disabilities consulted during the study survey confirmed to have faced problems linked to the non-recognition of their EU parking card in another Member State,³⁴⁴ as well as the majority of respondents to the Public Consultation.³⁴⁵ From 2018 to 2022, around 30 enquiries were submitted through the SOLVIT platform to raise issues about fines received even when showing the EU parking card. In particular, in two complaints, cardholders stated that their French parking card had not been recognised by local parking authorities abroad as it does not follow the EU model, which resulted in one case in a fine with the car being taken away and in the other case in denial to park in the special parking space for persons with disabilities close to an airport entrance.

Another issue affecting the mutual recognition of the EU parking card is the **different rights and benefits granted** across the Member States. The EU parking card is, indeed, used differently and may give right to different benefits depending on the Member State issuing it, which may create confusion when travelling to another Member State.

Table 57 – Examples of national differences in the rights granted by the EU parking card

Member States	Reserved parking spaces	Parking on roads where it is generally prohibited ³⁴⁶	Free parking in paid parking areas	No time limit parking in areas subject to time limits	Parking in pedestrian zones
Austria	✓				
Belgium	✓				
Bulgaria	✓				
Croatia	✓				
Cyprus	✓		✓	✓	
Czech Republic	✓	✓			✓ ³⁴⁷
Denmark		✓ ³⁴⁸	✓	✓	✓ ³⁴⁹
Estonia		✓	✓	✓	
Finland	✓	✓	✓	✓	
France	✓		✓	✓	

³⁴⁰ European Parliament (2022) Disability assessment, mutual recognition and the EU Disability Card - Progress and opportunities. Available at: [link](#).

³⁴¹ Survey targeted at NCAs Q3.6 - National differences in terms of validity period of the card; Survey targeted at other PAs Q3.6; Survey targeted at EU-level CSOs Q3.4; Survey targeted at national CSOs Q3.6 (See annex VII).

³⁴² Survey targeted at NCAs Q3.6 - National differences in the card's design; Survey targeted at other PAs Q3.6; Survey targeted at EU-level CSOs Q3.4; Survey targeted at national CSOs Q3.6 (See annex VII).

³⁴³ Respondents to the online workshop with CSOs held on 22 March 2023 - Q14 "To what extent do you think that national differences in terms of design and functioning of the EU parking card hinder its mutual recognition across the Member States?": "Large extent" (5), "Moderate extent" (2), n=8; Respondents to the online workshop with NCAs held on 23 March 2023 - Q12 "To what extent do you think that national differences in terms of design and features of the EU parking card hinder its mutual recognition across the Member States?": "Large extent" (1), "Moderate extent" (13), n=19.

³⁴⁴ Survey targeted at PwDs Q3.6, - Often (See annex VII).

³⁴⁵ Public Consultation QB.4 (Limited recognition of the card (issued by national or local authorities) across Member States), 406 out of 1204 (High extent), 371 out of 1204 (Very high extent) (See Annex IV).

³⁴⁶ If not causing obstructions.

³⁴⁷ Allowed only in individual cases and if urgently necessary.

³⁴⁸ Allowed for maximum 15 minutes.

³⁴⁹ Allowed only if explicitly allowed by local concessions and during the specified times.

Member States	Reserved parking spaces	Parking on roads where it is generally prohibited ³⁴⁶	Free parking in paid parking areas	No time limit parking in areas subject to time limits	Parking in pedestrian zones
Germany		✓	✓	✓	✓ ³⁵⁰
Greece	✓			✓	
Hungary		✓	✓	✓	✓
Ireland	✓				
Italy	✓	✓	✓		
Latvia					
Lithuania	✓	✓	✓ ³⁵¹	✓	
Luxembourg	✓				
Malta	✓				
Netherlands	✓	✓ ³⁵²			
Poland	✓	✓			
Portugal		✓ ³⁵³			
Romania			✓		
Slovakia	✓		✓		
Slovenia	✓				
Spain					
Sweden	✓	✓ ³⁵⁴	✓	✓	✓ ³⁵⁵

Source: Author's own elaboration based on desk research

In the study survey, 8 out of 25 NCAs,³⁵⁶ 4 out of 5 other public authorities,³⁵⁷ 11 out of 23 national CSOs,³⁵⁸ 7 out of 10 of EU-level CSOs³⁵⁹ and 10 out of 24 persons with disabilities³⁶⁰ believe that national differences in terms of rights granted by the card is an issue to a high or very high extent to the implementation of the EU parking card. Moreover, from 2018 to 2022, around 80 enquiries about the rights granted by the EU parking card across the Member States were submitted on the SOLVIT platform, demonstrating **uncertainty as to mutual recognition**. In many cases, persons used the platform to ask how they can use their EU parking card when visiting another Member State. For example, a French citizen holding the card asked what rights are granted by the EU parking card in Czech Republic. Similarly, a Hungarian cardholder asked if in Vienna (AT) he could park without paying as he is allowed to do in his home country showing the EU parking card. In around 70 enquiries, persons with disabilities, or someone on their behalf, simply asked if the EU parking card is actually recognized across the Member States. For example, an Italian cardholder travelling to Vienna (AT) asked if there was the need to communicate to the Austrian authorities the possession of the EU parking card, to prevent possible fines.

As a consequence, **national differences in the EU parking card result in some barriers to the freedom of movement for persons with disabilities**. Indeed, non-recognition of the EU parking card might result in practical disadvantages, such as not being able to park near the entrance of premises. Limited recognition of the EU parking card across the Member States is considered an issue linked to its implementation to a high or very high extent by 13 out of 25

³⁵⁰ Allowed only if explicitly allowed by local concessions and during the specified times.

³⁵¹ Allowed only in spaces marked with a wheelchair symbol.

³⁵² Allowed for maximum 3 hours.

³⁵³ Allowed only in case of absolute necessity, for a short time and without obstructing other vehicles or pedestrians.

³⁵⁴ Allowed for maximum 3 hours.

³⁵⁵ Allowed for maximum 3 hours.

³⁵⁶ Survey targeted at NCAs Q3.6 - National differences in terms of rights granted by the card (See annex VII).

³⁵⁷ Survey targeted at other public authorities Q3.6 - *National differences in terms of rights granted by the card: "High extent"* (80%), n=5.

³⁵⁸ Survey targeted at national CSOs Q3.6 (See annex VII).

³⁵⁹ Survey targeted at EU-level CSOs Q3.4 - National differences in terms of rights granted by the card (See annex VII).

³⁶⁰ Survey targeted at PwDs Q3.4 - National differences in terms of rights granted by the card (See annex VII).

respondents of the study survey targeted at NCAs,³⁶¹ 2 out of 5 other public authorities,³⁶² 9 out of 23 national CSOs,³⁶³ 6 out of 10 EU-level CSOs³⁶⁴ and 11 out of 24 persons with disabilities.³⁶⁵

This issue has been recently confirmed by a study conducted for the European Parliament, claiming that whether they are tourists, cross-border workers, job seekers or residents, persons with disabilities frequently encounter different criteria and procedures that are applied to disability assessments and to consequent parking entitlements or benefits granted across the Member States, resulting in limited freedom of movement.³⁶⁶ Also, as anecdotal evidence, the lack of mutual recognition was pointed out by a petition sent in 2015 by a British citizen to the European Parliament, stating that his/her EU parking card issued in the UK was not recognised in Spain, his/her country of residence, resulting in several fines.³⁶⁷

According to the respondents of the survey targeted at persons with disabilities, **the issues affecting the implementation of the EU parking card mostly hinder their ability to easily access different premises³⁶⁸ and to exercise their right to mobility in the EU.**³⁶⁹

Respectively 14 out of 23 national CSOs and 5 out of 10 EU-level CSOs responding to the study survey agreed that these issues hinder to a high or very high extent mostly the ability to easily access different premises.³⁷⁰ At the same time, 13 out of 23 national CSOs and 5 out of 10 EU-level CSOs, together with 9 out of 25 NCAs and 3 out of 5 other public authorities, also believe that the issues affecting the implementation of the EU parking card might increase to a high or very high extent the hassle/burden of obtaining information about the different parking conditions for persons with disabilities.³⁷¹ During a study interview conducted with a representative of a EU Parking association,³⁷² it has been highlighted that also frauds and forgeries of the EU parking card have a strong impact on the ability of persons with disabilities to easily access different premises, as persons using fake EU parking cards take away the spaces reserved to persons with disabilities. Similarly, in an enquiry submitted through the SOLVIT platform in 2021, a German person with disability complained that he was seeing a disproportionate amount of EU parking cards issued by the Czech authority and claimed that, in his opinion, a case of large-scale abuse was taking place, hindering his right to find a free parking lot reserved to persons with disability.

Is the EU parking card still needed?

Since its introduction, **the EU parking card proved to be still relevant, being one of the instruments available to persons with disabilities helping them to facilitate their free movement**, as shown by the number of valid EU parking cards in place (see Table 52 above) and the high percentage of consulted persons with disabilities claiming to be aware of the EU parking card³⁷³ and to use it³⁷⁴. Moreover, according to the study surveys, 19 out of 25 NCAs, 4 out of 5 other public authorities, 19 out of 23 national CSOs and 9 out of 10 EU-level CSOs

³⁶¹ Survey targeted at NCAs Q3.6 - Limited recognition of the card across Member States (See annex VII).

³⁶² Survey targeted at other public authorities Q3.6 – Limited recognition of the card across Member States (See Annex VII).

³⁶³ Survey targeted at national CSOs Q3.6 (See annex VII).

³⁶⁴ Survey targeted at EU-level CSOs Q3.4 – Limited recognition of the card across Member States (See annex VII).

³⁶⁵ Survey targeted at PwDs Q3.4 – Limited recognition of the card across Member States (See annex VII).

³⁶⁶ European Parliament (2022) Disability assessment, mutual recognition and the EU Disability Card - Progress and opportunities. Available at: [link](#).

³⁶⁷ Petition No 0590/2015 by M.G.S. (British) concerning the problems he is facing in Spain due to the use of a parking card for people with disabilities issued in the UK. Available at: [link](#).

³⁶⁸ Survey targeted at PwDs Q3.5 – Your ability to easily access different premises (See annex VII).

³⁶⁹ Survey targeted at PwDs Q3.5 – Your ability to exercise your right to mobility in the EU (See annex VII).

³⁷⁰ Survey targeted at EU-level CSOs Q3.5; Survey targeted at national CSOs Q3.7 (See annex VII).

³⁷¹ Survey targeted at NCAs Q3.7 - Increasing the hassle/burden of obtaining information about the different parking conditions for persons with disability; Survey targeted at other public authorities Q3.7; Survey targeted at EU-level CSOs Q3.5; Survey targeted at national CSOs Q3.7 (See annex VII).

³⁷² Targeted interview with one EU Parking association (#3).

³⁷³ Survey targeted at PwDs Q3.1 (See annex VII).

³⁷⁴ Survey targeted at PwDs Q1.6 (See annex VII).

believe that the EU parking card is still relevant to meet the current needs of persons with disabilities.³⁷⁵ According to different stakeholders (NCAs, CSOs, parking associations) consulted in the interviews and workshops, persons with disabilities tend to prepare their trip carefully when they travel, as they need to make sure of the accessibility and conditions offered in the premises and services they will use.

Yet, it should be highlighted that the EU parking card originates from a Recommendation implemented in 1998, almost 25 years ago, and which has never been updated to meet new developments and needs. In this regard, it shall be considered that Council Recommendation 2008/205/EC,³⁷⁶ which amended Council Recommendation 98/376/EC,³⁷⁷ did not substantially revise the provisions of the EU parking card, but only extended them to the new Member States adhering to the EU at that time (i.e. BG, CY, CZ, EE, HU, LT, LV, MT, PL, SI and SK). There is some evidence that **some of the Recommendation's provisions are not up to date and aligned with the latest developments and issues affecting persons with disabilities when travelling in the EU**, as well as with their needs and habits. On this point, there is an increase both in the number of persons with disabilities desiring to travel in the EU and in the frequency of their travels, thus confirming the relevance of an EU parking card that is mutually recognised across the Member States.³⁷⁸ According to a representative from an EU-level parking association interviewed during the study, to make sure that they will have a parking space at destination, some persons with disabilities prefer to reserve a private garage in case they cannot count on the availability of parking for persons with disabilities in the street.³⁷⁹

Moreover, **new and emerging technological developments are increasingly (mis)used to develop increasingly sophisticated forgery and fraud mechanisms**, as also confirmed by additional security features progressively included by the Member States in the card's design (see Table 56 in previous section). According to the study survey, the majority of respondents agree that specific security features added to the EU-model by some Member States (e.g. holograms, QR codes, barcodes, etc.) on the parking card are effective to tackle frauds³⁸⁰ and forgeries.³⁸¹ On this point, a representative from an EU-level parking association interviewed during the study pointed out that misuses of the EU parking card are a major problem as they prevent persons with disabilities to access certain services and to participate to social life.³⁸² The interviewee explained that enforcers in charge of checking the validity of the EU parking card are not always aware of how a real EU parking card looks like, since there is no cross-national database on parking cards' design or on parking cards' holders. Hence, the interviewee highlighted that the current paper copy solution is not in line anymore with the progress of technology that exposes the EU parking cards to more and more sophisticated frauds and forgeries. According to a representative of another EU-level parking association interviewed during the study, frauds and forgeries of the EU parking card could be easily prevented by introducing a digital format of the card. However, the interviewee pointed out that moving to a

³⁷⁵ Survey targeted at NCAs Q3.13; Survey targeted at other public authorities Q3.13; Survey targeted at EU-level CSOs Q3.11; Survey targeted at national CSOs Q3.13 (See annex VII).

³⁷⁶ Council Recommendation of 3 March 2008 adapting Recommendation 98/376/EC on a parking card for people with disabilities, by reason of the accession of the Republic of Bulgaria, the Czech Republic, the Republic of Estonia, the Republic of Cyprus, the Republic of Latvia, the Republic of Lithuania, the Republic of Hungary, the Republic of Malta, the Republic of Poland, Romania, the Republic of Slovenia and the Slovak Republic. Available at: [link](#).

³⁷⁷ 98/376/EC: Council Recommendation of 4 June 1998 on a parking card for people with disabilities. Available at: [link](#).

³⁷⁸ Gonda, T. (2021). Travelling Habits of People with Disabilities. *GeoJournal of Tourism and Geosites*, 37(3), 844–850. Available at: [link](#).

³⁷⁹ Targeted interview with one EU Parking association (#3).

³⁸⁰ Survey targeted at NCAs Q3.4 - Specific security features on the card (e.g. holograms, QR code, barcode, etc.); Survey targeted at other public authorities Q3.4; Survey targeted at national CSOs Q3.4; Survey targeted at EU-level CSOs Q3.2 (See annex VII).

³⁸¹ Survey targeted at NCAs Q3.5 - Specific security features on the card (e.g. holograms, QR code, barcode, etc); Survey targeted at other public authorities Q3.5; Survey targeted at national CSOs Q3.5; Survey targeted at EU-level CSOs Q3.3 (See annex VII).

³⁸² Targeted interview with one EU Parking association (#3).

digital way of enforcing the EU parking card entails the risk of not having the physical card on the car, which might lead other people to think that the car is parked illegally.³⁸³

Moreover, a parking association representative noted that **the paper-based card is not in line anymore with how parking rights are controlled**, as this is done more and more digitally, checking the car license plates in a national or local database. An increasing number of Member States uses the ANPR (automatic number-plate recognition), as in the Netherlands, where an automatic camera picks the car plate number to recognize it and the system uses a database to check who has a parking right in that spot. However, the camera does not necessarily pick up the information on the ownership of an EU parking card, unless the physical parking card has a particular technology in it (e.g. NFC). So, persons with disabilities end up getting fines even if they have a right of parking in a specific space.³⁸⁴ According to the interviewee, in the future there will be the need for a fraud-proof EU parking card and a database solution that will allow to check whether a vehicle is linked to an EU parking card or not.³⁸⁵

In this regard, 6 out of 7 CSOs and 13 out of 19 NCAs participating to the study workshops agreed that an update of Council Recommendation 98/376/EC, and in particular of its Annex I, would be necessary to update the format of the card in order to avoid fraud and forgery and address new ways of controlling parking rights.³⁸⁶

The SIMON project, funded by the Competitiveness and innovation Framework Programme, aimed at enhancing the EU parking card through digital technologies to allow contactless and mobile user identification, with a view of reducing risks of fraud and issues related to data privacy (see Box 8).³⁸⁷

Box 8 – The SIMON project

The project consisted in four large-scale pilots in Madrid (ES), Lisbon (PT), Parma (IT) and Reading (UK), with the objective to use Information and Communication Technologies (ICT) services to promote the independent living and societal participation of persons with disabilities in the context of public parking areas and other transport modes. The two main challenges addressed by the project were the reduction of frauds in the use of the EU parking card and the proposal of specific multimodal navigation solutions for elderly people and persons with disabilities.³⁸⁸ The project demonstrated the potential of new technological solutions to improve the effectiveness of the EU parking card, facilitate free movement of persons with disabilities and reduce fraud. More specifically, new technologies were explored to identify innovative tools and appropriate information services to users of the EU parking card as well as to overcome difficulties in collecting reliable information about parking accessibility.³⁸⁹ For example, with the development of the SIMON project, it has been proven that a digital format for the EU parking card would allow easier checks on its validity, reducing frauds, and would help to overcome the issues linked to the EU parking card recognition in different languages.³⁹⁰

Source: Author's own elaboration based on desk research

³⁸³ Targeted interview with one EU Parking association (#9).

³⁸⁴ Targeted interview with one EU Parking association (#9).

³⁸⁵ Targeted interview with one EU Parking association (#9).

³⁸⁶ Respondents to the online workshop with CSOs held on 22 March 2023 and to the online workshop with NCAs held on 23 March 2023.

³⁸⁷ Muñoz, E., Serrano, M., Marqués, A., Ferreras, A., & Solaz, J. (2016, June). SIMON: an ICT proposal for the mobility impaired citizens. In *11th ITS European Congress, Glasgow, Scotland* (pp. 6-9).

³⁸⁸ Muñoz, E., Serrano, M., Vivó, M., Marqués, A., Ferreras, A., & Solaz, J. (2016). SIMON: assisted mobility for older and impaired users. *Transportation research procedia*, 14, 4420-4429.

³⁸⁹ Muñoz, E., Serrano, M., Marqués, A., Ferreras, A., & Solaz, J. (2016, June). SIMON: an ICT proposal for the mobility impaired citizens. In *11th ITS European Congress, Glasgow, Scotland* (pp. 6-9).

³⁹⁰ European Parliament (2022) Disability assessment, mutual recognition and the EU Disability Card - Progress and opportunities. Available at: [link](#).

How coherent is the EU parking card with other EU policies

This section aims to understand the extent to which the EU parking card is coherent with other EU policies in the field of free movement, disability and social rights.

As far as **free movement rights** are concerned, the coherence assessment looked at the consistency between the EU parking card and Directive 2004/38/EC on free movement.³⁹¹ The preamble of Directive 2004/38/EC specifies that, according to the prohibition of discrimination contained in the EU Charter of Fundamental Rights, Member States should ensure the free movement of EU citizens across all the Member States without discrimination on grounds, among others, of disability.³⁹² Likewise, the preamble of Recommendation 98/376/EC states that, together with the promotion of the mutual recognition, the aim of the EU parking card is to facilitate the freedom of movement of persons with disabilities. Hence, the Recommendation proved to be coherent with and supports the goal of Directive 2004/38/EC on free movement which, in turn, takes into account non-discrimination against persons with disabilities.

With respect to EU disability policies, the assessment looked at the consistency between the EU parking card and the **pilot EU Disability Card** implemented in eight Member States (i.e. BE, CY, EE, FI, IT, MT, RO and SI). More specifically, it investigated whether the issuing authorities, the eligibility criteria and the rights granted by the pilot EU Disability Card in these Member States are coherent with those in place for the EU parking card in the same countries.

³⁹¹ Directive 2004/38/EC of the European Parliament and of the Council of 29 April 2004 on the right of citizens of the Union and their family members to move and reside freely within the territory of the Member States amending Regulation (EEC) No 1612/68 and repealing Directives 64/221/EEC, 68/360/EEC, 72/194/EEC, 73/148/EEC, 75/34/EEC, 75/35/EEC, 90/364/EEC, 90/365/EEC and 93/96/EEC. Available at: [link](#).

³⁹² Ibid.

Table 58 – Comparison between the EU Disability Card and the EU parking card the Member States participating to the pilot project

Member State	Elements of comparison	EU Disability Card	EU Parking Card
BE	Issuing authority	<ul style="list-style-type: none"> FPS Social Security Vlaams Agentschap voor Personen met een Handicap (VAPH) Agence pour une Vie de Qualité (AViQ) Service Personne Handicapée Autonomie Recherchée (Phare) Dienststelle für Selbstbestimmtes Leben (DSL) 	<ul style="list-style-type: none"> Public Service Social Security.
	Eligibility criteria	<ul style="list-style-type: none"> Persons recognised by or receive help from an official institution for persons with disabilities. Children receiving increased child benefit. 	<ul style="list-style-type: none"> Persons with a permanent disability of 50% or more (disability of the legs) or of 80% or more (other invalidity); War invalid (civil or military) with a disability of 50% or more; Persons completely paralyzed on the arms or if both arms have been amputated; Persons with reduced self-reliance or mobility
	Rights granted	<ul style="list-style-type: none"> making activities, such as sports events, museum visits and other leisure activities, more accessible. 	<ul style="list-style-type: none"> parking and traffic rights.
CY	Issuing authority	<ul style="list-style-type: none"> Department for Social Inclusion of Persons with Disabilities. 	<ul style="list-style-type: none"> Department for Social Inclusion of Persons with Disabilities.
	Eligibility criteria	<ul style="list-style-type: none"> Cypriot and EU citizens with disabilities who have a permanent residence in the area controlled by the Republic of Cyprus for at least consecutive 12 months; Persons with disabilities with recognised refugee status or supplementary protection status, in accordance with the Refugee Law. 	<ul style="list-style-type: none"> Cypriot and EU citizens with disabilities who have a permanent residence in the area controlled by the Republic of Cyprus for at least consecutive 12 months; Persons with disabilities with recognized refugee status or supplementary protection status, in accordance with the Refugee Law; Organisations that provide care to persons with disabilities. <p>“Person with disability” for the purposes of issuing Parking card means:</p> <ul style="list-style-type: none"> Persons whose disability involves amputation or severe weakness of the upper and/or lower limbs due to any cause, and as a result the person with disability has a permanent degree of disability of 39% or more;

Member State	Elements of comparison	EU Disability Card	EU Parking Card
			<ul style="list-style-type: none"> Persons with disabilities according to the provisions of the law for special allowance for blind persons, severe motor disability allowance scheme, care allowance for quadriplegic people, care allowance for paraplegic persons; Persons with intellectual disabilities; Persons that go under heamodialysis.
	Rights granted	<ul style="list-style-type: none"> it ensures equal access to some specific benefits in the field of culture, tourism, entertainment, sports and transports. 	<ul style="list-style-type: none"> parking and traffic rights.
EE	Issuing authority	<ul style="list-style-type: none"> National Social Insurance Board. 	<ul style="list-style-type: none"> Issuing authority: National Social Insurance Board.
	Eligibility criteria	<ul style="list-style-type: none"> All persons with disabilities that have a disability certificate issued by Social Insurance Board (degree and type of disability and duration of disability). 	<ul style="list-style-type: none"> Persons with disabilities who has assessed severe, profound or moderate degree of movement or vision function disability; Persons with temporary movement or vision function deviation; Persons with a mobility disability and people servicing persons with a mobility disability or blind persons
	Rights granted	<ul style="list-style-type: none"> benefits (not specified). 	<ul style="list-style-type: none"> parking and traffic rights.
FI	Issuing authority	<ul style="list-style-type: none"> Kela (an independent social security institution supervised by the Finnish Parliament). 	<ul style="list-style-type: none"> Finnish Transport and Communications Agency.
	Eligibility criteria	<ul style="list-style-type: none"> Persons with a disability allowance; Pensioners with a care allowance; Persons with speech, hearing and vision impairment with an interpreter assistance and the person entitled to accompanying them; Persons with a mobility assistance provided under the Social Welfare Act; Persons cared for by an informal caregiver and their caregiver; Persons with a travel companion service and the person entitled to accompanying them; 	<ul style="list-style-type: none"> Persons with a handicap resulting from an illness, problem or disability preventing the individual from walking and the disability category for this handicap is 11 or higher; Persons with a disability resulting from impaired vision. Visual acuity in the better eye can be a maximum of 0.1 or overall eyesight corresponds to disability category 17; Persons with a permit for transporting a person with serious disabilities if the said person requires regular transport and cannot manage without an escort after transportation.

Member State	Elements of comparison	EU Disability Card	EU Parking Card
		<ul style="list-style-type: none"> Persons with assisted living under the Act on Services for Persons with Disabilities and the person entitled to accompanying them; Persons with personal assistance and the person entitled to accompanying them. 	
	Rights granted	<ul style="list-style-type: none"> disability allowance, care allowance and interpreter assistance. 	<ul style="list-style-type: none"> parking and traffic rights.
IT	Issuing authority	<ul style="list-style-type: none"> INPS (National Institute of Social Security) 	<ul style="list-style-type: none"> Municipality of residence.
	Eligibility criteria	<ul style="list-style-type: none"> Persons with disabilities from 67% to 100% disability or from 50% if deriving from the workplace; Persons with accompanying allowance; Blind persons; Deaf persons. 	<ul style="list-style-type: none"> Persons with significantly reduced walking ability; Blind persons. <p>For a period of less than five years, therefore for a limited period, the card can be released also to:</p> <ul style="list-style-type: none"> Persons with temporary impaired walking ability due to injury or other pathological causes; Persons with total absence of any functional autonomy and with the need to continuous assistance, to go to places of care.
	Rights granted	<ul style="list-style-type: none"> free access or discounts to access national museums and other cultural premises. 	<ul style="list-style-type: none"> parking and traffic rights.
MT	Issuing authority	<ul style="list-style-type: none"> Commission for the Rights of Persons with Disability (CRPD). 	<ul style="list-style-type: none"> Aġenzija Sapport.
	Eligibility criteria	<ul style="list-style-type: none"> A person has to meet the definition of disability as defined by the Equal Opportunities (Persons with Disability) Act (EOA) 2000. The EOA defines disability according to the definition of disability in Article 2 of the UN Convention on the Rights of Persons with Disabilities (UNCRPD). 	<ul style="list-style-type: none"> Persons who are entitled to the European Disability Card and have severe and permanent or temporary mobility impairment; Persons with a permanent visual impairment, not exceeding 6/60 in the better eye, or who have a visual limitation preventing them from seeing from an angle of at least 20 degrees (tunnel vision) and who use a motor vehicle on a regular basis; Persons who have a severe permanent impairment who drive a car regularly; Persons who have permanent and severe physical impairment which prevents them from walking or who do so with great difficulty or for those whom any effort at walking would be detrimental to their lives on account to their impairment and who makes use of a motor vehicle on a regular basis;

Member State	Elements of comparison	EU Disability Card	EU Parking Card
			<ul style="list-style-type: none"> Persons with a severe mental impairment or who exhibit severe challenging behaviour and who require frequent assistance and/or supervision during the day and night and who use of a motor vehicle on a regular basis.
	Rights granted	<ul style="list-style-type: none"> free access and discounts to cultural and touristic destinations. 	<ul style="list-style-type: none"> parking and traffic rights.
RO	Issuing authority	<ul style="list-style-type: none"> National Authority for the Protection of the Rights of Persons with Disabilities. 	<ul style="list-style-type: none"> Local public authority.
	Eligibility criteria	<ul style="list-style-type: none"> Children and adults with severe, accentuated, medium or light disabilities, based on a valid disability certificate. Only persons who have a disability certificate are allowed to hold the Card. 	<ul style="list-style-type: none"> Children who hold a Disability Certificate issued by the decision of the Commission for child protection, (document within its validity period); Adults who hold a Disability Certificate issued by the Disability Advice Board or, as the case may be, a Decision issued by the Superior Commission for the Evaluation of Adult Persons with Disabilities, (document within its validity period); Their legal representatives (the parent or the person designated, according to the law, to exercise the rights and fulfil the obligations towards the person with disabilities), on request, can use a card for free parking spaces.
	Rights granted	<ul style="list-style-type: none"> free or partially subsidized access for people with disabilities to cultural, sporting and leisure events. 	<ul style="list-style-type: none"> parking and traffic rights.
SI	Issuing authority	<ul style="list-style-type: none"> local administrative offices. 	<ul style="list-style-type: none"> local administrative offices.
	Eligibility criteria	<ul style="list-style-type: none"> Persons with recognised disability based on the Equalisation of Opportunities for Persons with Disabilities Act Citizens of the Republic of Slovenia with permanent residence in the Republic of Slovenia or foreigners with permanent residence in the Republic of Slovenia; Persons with Disabilities I., II. and III. categories under the Pension and Disability Insurance Act (all workers with disabilities - decisions based on Act); 	<ul style="list-style-type: none"> Persons who have suffered from at least 60% physical impairment due to loss, malfunction or paralysis of the lower or upper limbs or pelvis; Persons with multiple sclerosis; Persons with muscular and neuromuscular disorders with estimated at least 30% physical impairment; Persons mentally handicapped who have been granted disability according to the regulations on the protection of persons with physical and mental disabilities;

Member State	Elements of comparison	EU Disability Card	EU Parking Card
		<ul style="list-style-type: none"> • Persons with recognised physical impairment (PI): around 90% PI due to loss of vision, around 70% PI due to hearing loss or at least 80% PI, if the PI is cumulative and the minimum percentage for one PI is at least 70% (Pension and Disability Insurance Act - physical impairment decisions); • Persons with disabilities according to the Vocational Rehabilitation and Employment of Disabled Persons Act (Decision by Employment Service of Slovenia); • Recognised status of a Persons with Disabilities according to the Act Regulating the Training and Employment of Disabled Persons (Decision by Employment Service of Slovenia); Status acquired under the Act Concerning Social Care of Mentally and Physically Handicapped Persons (Decisions by Centre for Social Work or rarely by Pension and Disability Insurance Institute of Slovenia). 	<ul style="list-style-type: none"> • Persons with at least 90% physical impairment due to visual loss; • Minors who are physically or mentally handicapped or are impeded in movement due to loss, malfunction, paralysis of the lower limbs or pelvis; • Health services, social services and disability organizations, whose workers visit home care workers because of urgent and unavoidable services needed for their health and life.
	Rights granted	<ul style="list-style-type: none"> • various discounts - like entry ticket to a museum or better access to attractions at a theme park. 	<ul style="list-style-type: none"> • parking and traffic rights.

Source: Author's own elaboration based on desk research

As presented in Table 58, overall, the issuing authorities of the pilot EU Disability Card and of the EU parking card are the same only in Cyprus and Estonia. The pilot EU Disability Card seems to be issued mostly by central authorities, also in countries where the management model of the EU parking card is decentralised (i.e. IT and RO), apart from Slovenia where both cards are issued by local administrative offices.

In terms of eligibility criteria, overall, those to obtain the EU parking card are more specific than those for the EU Disability Card. For example, the criteria in place in Estonia and Italy for obtaining the EU parking card are linked to mobility impairment and motor disability. Furthermore, in Italy, the EU parking card might be granted also in case of a temporary impairment of walking ability of the person, contrarily to the EU Disability Card that assumes a permanent disability status. In other cases, as in Romania, the eligibility criteria for obtaining the two cards are quite similar, with the exception that the EU parking card might be granted also to the legal representative that uses the car to accompany a person with disabilities. This is further proved by the responses to the study survey targeted at NCAs, where 15 out of 25 NCAs affirmed that the eligibility criteria for obtaining a disability card, if present in the Member State, are not the same as the ones for obtaining the EU parking card.³⁹³ Moreover, 4 of these respondents explicitly stated that the eligibility criteria in place for the EU parking card are stricter with respect to the ones for the disability card.³⁹⁴

Then, for what concerns the rights granted, the two cards seem to be complementary and the rights granted to cardholders are not overlapping. Indeed, in general, the EU Disability Card often grants free access or discounts in the sector of culture, leisure, sport and public means of transport, while the EU parking card gives rights related to parking (e.g. reserved parking slots, free parking, parking without time limit) and traffic (e.g. the possibility to circulate in limited traffic zones).

With regard to the coherence with **social rights**, in 2017, the European Parliament, the Council and the Commission proclaimed the European Pillars of Social Rights, a list of 20 key principles aimed at building a fair, inclusive and full of opportunity European Union.³⁹⁵

The rights of persons with disabilities are taken into account by Principle n. 3 on equal opportunities, which claims: *"Regardless of gender, racial or ethnic origin, religion or belief, disability, age or sexual orientation, everyone has the right to equal treatment and opportunities regarding employment, social protection, education, and access to goods and services available to the public"* and by Principle n. 17, which is specifically addressed to persons with disabilities, claiming that *"people with disabilities have the right to income support that ensures living in dignity, services that enable them to participate in the labour market and in society, and a work environment adapted to their needs"*.

These two principles are in line with the preamble of Council Recommendation introducing the EU parking card, which reads *"all people with disabilities should be entitled to additional concrete measures aimed at improving their occupational and social integration"* and *"a mode of transport other than public transport constitutes, for many people with disabilities, the only means of getting about independently for purposes of occupational and social integration"*. Therefore, it is possible to conclude that the EU action towards the promotion of social rights is coherent with the objective of Recommendation 98/376/EC to improve accessibility for persons with disabilities and to promote their rights and equality of opportunity.

On the other hand, the EU is also committed to making Europe the first climate neutral continent in the world through the **European Green Deal**, a set of proposals to make all sectors of the EU's economy fit to reach climate targets in a fair, cost effective and competitive way.³⁹⁶ One of the target of the European Green Deal is to transition to greener mobility offering clean, accessible and affordable transport everywhere, in particular by

³⁹³ Survey targeted at NCAs Q3.1 (See annex VII).

³⁹⁴ Survey targeted at NCAs Q3.1 (See annex VII).

³⁹⁵ European Pillars of Social Rights. Available at: [link](#).

³⁹⁶ The European Green Deal. Available at: [link](#).

halving the emissions of cars and vans by 2030. However, as stated in Recommendation 98/376/EC, private vehicles are often the main means of transport used by persons with disabilities to move independently. Thus, in order to allow persons with disabilities to make sustainable choices such as preferring rail travel rather than using a private car, it is key to make public transportation means accessible and affordable for everyone.³⁹⁷

How cost-efficient was the implementation of the EU parking card

This section aims to understand if the introduction of the EU parking card has been efficient for the Member States and stakeholders in terms of proportionality of costs and benefits, also compared to a situation in which different national parking cards had continued to be used. In order to evaluate the efficiency of this instrument, expected benefits are understood as the capability of the EU parking card to improve the free movement of persons with disability and the expected costs are understood as the cost for Member States, public authorities and parking managers to implement and monitor the use of the EU parking card.

Overall, the EU parking card for persons with disabilities proved to be an efficient policy initiative. Indeed, although 11 out of 25 NCAs and 3 out of 5 other public authorities claimed that the EU parking card entails costs for national authorities in charge of managing and issuing the card in the Member States,³⁹⁸ 39 out of 63 respondents to the online surveys believe that the benefits linked with the adoption of the EU parking card for persons with disabilities have overcome the related costs.³⁹⁹

The authority responsible for issuing the EU parking card in the municipality of Rome consulted during the study reported the following unitary costs for the issuance of the card and additional security features:

- EU Parking card + TAG RFID: EUR 0.30
- Plastic poche: EUR 0.348
- Holograms: EUR 0.25

The Belgian public authority responsible for the issuing of the EU parking card reported that the application of a stamp hologram, based on a standard (thus not a custom made one, but owned by the foil manufacturer) holographic foil, costs between EUR 0.017 and EUR 0.02 per card (depending on the size and the foil used). On the other hand, the application of a QR code does not result in an additional variable cost, since it is applied at the same stage as the rest of the personalisation of the card, so it is included in the fixed costs decided during the initial set-up of the project.

For what concerns indirect costs to develop the digital platform to manage the parking cards and the associated car plates (e.g., to check cards' validity and the right to park in reserved spots and to access certain limited traffic areas), the authority from the municipality of Rome underlined that it is not possible to retrieve them, as a unique platform is in place to manage everything that concerns traffic and authorizations.

No further specific information could be found on the costs of implementation of the EU parking card, but considering that the Recommendation dates from 1998, it can be assumed that implementation costs have been offset as the costs of issuing new cards with the EU model should now be incorporated in the business-as-usual costs. Yet, there is some evidence that national differences in the design and implementation of the EU parking card contribute to increasing overall costs. Specifically, as reported by the representative of an EU-level parking association interviewed during the study, the increasing divergences in the design of the EU parking card across the Member States

³⁹⁷ European Disability Forum (2019) An inclusive Green Deal for Europe. Available at: [link](#).

³⁹⁸ Survey targeted at NCAs Q3.11; Survey targeted at other public authorities Q3.11 (See annex VII).

³⁹⁹ Survey targeted at NCAs Q3.12; Survey targeted at other public authorities Q3.12; Survey targeted at national CSOs Q3.12; Survey targeted at EU-level CSOs Q3.10 (See annex VII).

have raised the need to provide parking controllers with ad-hoc trainings on the different types of cards in place.⁴⁰⁰

What is the EU added value of the EU parking card compared to keeping different national parking cards

Despite its shortcomings, overall the EU parking card improved mutual recognition, as its visual standard is easy to recognise for everyone and the results of the EU intervention in this specific policy area suggest that such EU-model could spill over to other areas that need harmonisation across the EU.

Most respondents to the online survey agreed that the EU parking card for persons with disabilities provides greater benefits than if different parking cards had continued to be used.⁴⁰¹ Similarly, a survey conducted by the EDF in 2020 pointed the EU parking card as one of the most practical and visible EU initiatives on disability issues. In particular, the respondents to the survey believe that the EU parking card is successfully recognised across the Member States, making travelling abroad easier.⁴⁰² In addition, 14 out of 24 persons with disabilities consulted in the context of the study survey declared to use the EU parking card when travelling abroad⁴⁰³ and agreed that the card facilitates travels to other Member States.⁴⁰⁴

A representative from an EU-level parking association interviewed during the study agreed that the EU can bring added value also in the future developments of the EU parking card. Indeed, in the interviewee's view, this instrument should be updated with digital components, and this is a field where the EU can bring added value with very concrete solutions, making at disposal of the Member States the technological knowledge to help this process of innovation and digitalisation. The interviewee, further added that further developments of the EU parking card could take inspiration from other initiatives such as the European Car and Driving licence Information System (Eucaris),⁴⁰⁵ an exchange mechanism that connects the national vehicle and driving licence registration authorities in Europe to support the fight against car theft and registration fraud, since some countries (e.g. Netherlands) are already enforcing parking rights by controlling the car plates against a database of car owners, and an option could be to register the EU parking card with the car.⁴⁰⁶

⁴⁰⁰ Targeted interview with one EU Parking association (#3).

⁴⁰¹ Survey targeted at NCAs Q3.10; Survey targeted at other public authorities Q3.10; Survey targeted at national CSOs Q3.10; Survey targeted at EU-level CSOs Q3.8 (See annex VII).

⁴⁰² EDF recommendations for strengthening the EU Parking Card 2020. Available at: [link](#).

⁴⁰³ Survey targeted at PwDs Q3.2 (See annex VII).

⁴⁰⁴ Survey targeted at PwDs Q3.3 (See annex VII).

⁴⁰⁵ Eucaris. Available at: [link](#).

⁴⁰⁶ Targeted interview with one EU Parking association (#3).

Mapping of services providing preferential conditions in the EU

The adoption of the United Nations Convention on the Rights of Persons with Disabilities in 2008 gave the person with disabilities a promise to be treated equally with dignity and equal rights. This is particularly important as oftentimes, within the legal frameworks, persons with disabilities were perceived more as objects and/or recipients of care and charity rather than autonomous individuals with rights. In this regard, the Convention ascribed that in order for persons with disabilities to fully realise their equal citizenship in the world they need to be guaranteed equality, dignity, autonomy, independence, accessibility and inclusion.⁴⁰⁷ One of the ways to ensure such treatment is to make all services accessible from the perspective of universal service obligations as well as physical accessibility but also by allowing for preferential conditions in terms of service provision to ensure participation of persons with disabilities in the society. Accessibility for people with disabilities is a prerequisite for participation in society and in economic life, but much more needs to be done to overcome this challenge.

Types of preferential conditions

Most common preferential conditions offered to persons include:

- Monetary support;
- Grants;
- Other type of support.

Given that this study scope is focused on short-term stays in other Member States, the analysis focused on monetary and other support. This is because the grants category (applying typically to adaptation of housing but may – in a handful of cases – also cover adaptation of vehicles, including rental cars) is predominantly accessed by persons with disabilities who reside permanently or long-term in a given Member State.

With regards to **monetary support**, this category covers price reduction or free access to events or specific services and is largely provided for accessing public transport services, cultural events, leisure, and sport services, as well as for entering amusement parks. Moreover, monetary support includes also exemptions, i.e. persons with disabilities are freed from an obligation or liability imposed, such as paying for particular services (e.g. certain taxes, electricity or telecommunications services).

The price reduction can start at a 10% entrance fee/ticket price discount all the way to a 100% discount. In some countries, while a person with disability receives “only” a certain price reduction, their personal assistant may use the services for free. For example, in Slovakia national rail transport providers provide a 60% price reduction for the holder of the national disability card, while those who’s national disability card assigns them personal assistants are provided also with a free transportation of the assistant, wheelchairs, a stroller for an immobile child and/or a guide dog.

Member States also offer exemptions for persons with disabilities across some services. Some of these types of preferential treatment are offered by sectors and services less relevant for short-term stays (e.g. by electricity service providers). However, a few exemptions are offered in e.g. the tourism sector, which may be deemed a key sector for the purposes of this study.

Box 9 provides examples of the types of monetary support provided in some Member States.

⁴⁰⁷ Arnardottir, O. M. and G. Quinn (2009). The UN Convention on the Rights of Persons with Disabilities: European and Scandinavian perspectives. ISBN 978-90-04-16971-5.

Box 9 – Examples of monetary support provided in some Member States⁴⁰⁸

- In Austria, parents of children with disabilities receive a school travel allowance to ensure the child can access transport to and from school regardless of the distance between the home and the school.
- In Croatia, exemptions are in place for:
 - Paying the annual fee for the use of public roads and the tolls for the use of motorway
 - Paying the tourist tax.
- In Cyprus, persons with reduced mobility and persons with visual or hearing disabilities are exempted from the fixed charges for particular telecommunication products and services. Furthermore, in the tourism sector persons with disabilities may make use of beach parasols and sunbeds for free for up to 10% on the total number of beach sunbeds per arranged beach (contact with the Municipal and Village Authorities in advance is needed).
- In the Czech Republic, telecommunication providers may provide a price reduction that the operator's "loss" amounts to a maximum of CZK 200 (ca EUR 8.50) loss including VAT per customer per month. The providers can determine in what form they will provide benefits. Therefore, they offer special tariffs for fixed and mobile lines (or internet) to the eligible persons with disabilities. If the applicant for a discounted tariff is a minor, the person who is their legal representative is entitled to establish a discounted tariff.
- In Estonia, on certain dates persons with disabilities have free access to cultural activities while during the rest of the year they are entitled to a price reduction in entrance fees.
- In Germany, Lufthansa offers persons with severe disabilities, a reduction in the air fare on domestic German flights with Lufthansa and the regional airlines under certain conditions. Lufthansa and the regional carriers also carry the accompanying person of a severely disabled person with identification mark B on domestic German flights free of charge. Furthermore, persons with disabilities are entitled to a free use of taxis if the trip is necessary for a medical appointment. It has to be granted and approved by the insurance company beforehand.
- The Greek postal services transport, free of charge, postal items weighing up to 7 kg, sent from/to blind or severely visually impaired persons (i.e. 80% disability) or from/to institutions/associations for the blind.
- In Romania, persons who have a handicap-adapted car are exempt from paying road taxes. Furthermore, they may access all matches organised by the Romanian Football Association as prescribed by law.

Source: Author's own elaboration based on country fiches

Other support offered in the Member States is very varied in terms of scope and covers many sectors. The support may include access to braille, audio guides etc., or specialised support within the job recruitment sector. Miscellaneous support may also include commitments by specific sectors to serve persons with disabilities before other customers. Box 10 provides examples of the types of preferential conditions provided in some Member States.

Box 10 – Examples of other support provided in some Member States⁴⁰⁹

- In Belgium, persons with disabilities visiting amusement parks have access to:
 - Free audio/visual guides
 - Explanatory brochures or leaflets adapted to meet different needs (in Braille lettering or easy to read for example)
 - Adapted guided visits (in sign language for example).
 - Reserved accessible parking areas
 - Priority lines for easier access to attractions.
- In the Czech Republic, persons with disabilities have the right to be served without joining the queue if this action requires a longer wait, especially standing. Personal discussion of matters is not considered to be shopping in shops or procuring paid services, or treatment and examination in medical facilities.
- In Cyprus, persons with disabilities can more easily be hired to the public sector, provided that the number of persons with disabilities hired under the relevant law does not exceed 7% of the total number of employees in Public Service.

⁴⁰⁸ Examples taken from the country fiches.

⁴⁰⁹ Examples taken from the country fiches.

- In Greece, the "My Work" platform helps persons with mental disabilities to find employment. Furthermore, in accordance with "Rights of citizens and businesses in their dealings with public services" people with disability who attend all public services of the country must be served on a priority basis.
- In Italy, there are various projects in place to promote social and work inclusion via the provider Agenzia Nazionale Disabilità e Lavoro (ANDEL), which is a not-for-profit agency.
- In Luxembourg, persons who are recognised to be living with disabilities should receive offers of employment that take into account the disability in question, either on the ordinary labour market or in a sheltered environment. Human assistance is also available for people with visual or hearing impairments.

Source: Author's own elaboration based on country fiches

In some Member States (e.g. BE, DK), **preferential conditions are offered also to personal assistants**, predominantly to support persons with disabilities to accessing public transport or cultural events. For example, in Malta some service providers, particularly providers overseeing touristic attractions, may decide to offer free entrance or other preferential conditions to personal assistants of their own volition. In Estonia, preferential conditions for assistants differ across the various sectors. For example, in public transportation the assistant of visually impaired persons rides free of charge while when visiting a theatre, the assistants pay 50% of the price.

Table 59 below provides an overview of sectors where examples of service providers who offer preferential conditions to persons with benefits or their accompanying assistant for free, i.e. no fee is paid for the entry, ticket, service, have been identified. In many cases, these service providers are publicly owned. In the instances where the service provider is private, the decision has been made by the service provider themselves or is mandatory under national legislation. Oftentimes, this free service may also be accompanied by additional preferential conditions.

Table 59 – Overview of services that are available free of charge (to persons with disabilities and/or their personal assistants)

Service	AT	BE	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IE	IT	LT	LU	LV	MT	NL	PL	PT	RO	SE	SI	SK	
Amusement parks																												
Cultural services																												
Distributive trades																												
Leisure services																												
Organisation of trade fairs																												
Parking																												
Postal services																												
Private transport																												
Public transport																												
Services in the field of tourism																												
Services provided both to business and consumers																												
Sports centres																												
Telecommunication																												
Travel agencies																												

Only to persons with disabilities
Both to persons with disabilities and personal assistants

Source: Authors' own elaboration based on desk research conducted at the Member State level and online surveys

The analysis indicates that there is limited consistency in the types of preferential conditions offered across the Member States. The assessment found commonalities across the Member States regarding reduced costs for persons with disabilities in a few key sectors. These most common preferential treatment types allow persons with disabilities to access:

- Selected public transport systems;
- Parking spaces;
- Cultural events, in particular museums in the Member States;
- Leisure centres and sport centres.

However, the extent to which preferential treatment is applied across these services is not uniform – in some Member States the preferential treatment applies to some public transport services and not all (e.g. France), and access to museums may refer to all or to a few selected institutions. Therefore, the preferential treatment cannot be concluded to be universal even in Member States that offer reduced costs on a mandatory basis. It is also relevant to point out that monetary support alone does not indicate a complete removal of barriers for travel. Reduced or free entry also needs to be physically accessible in order to be exercised by persons with disabilities.

Table 60 below provides a complete overview of preferential conditions offered per Member State and per service sector.

Table 60 – Overview of the types of preferential conditions offered to persons with disabilities across the Member States

Services	AT	BE	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IE	IT	LT	LU	LV	MT	NL	PL	PT	RO	SE	SI	SK
Public transport					Both	Other							Other					Both					Both		Other		
Private transport		Other		Other	Other							Other	Other														
Parking	Other	Other		Other	Other	Other	Other		Other	Other	Other		Both	Other		Other		Other		Other	Other	Other	Other	Other	Other	Other	Other
Business services			Other	Other											Other				Other								
Facilities management			Other												Other			Other									
Advertising															Other												
Recruitment services			Other	Other					Other	Other				Other		Other		Other									
Services to commercial agents	Other		Other			Other									Other												
Services provided both to business and consumers			Other		Other										Other		Other		Other							Other	Other
Real estate services			Other												Other			Other	Other								
Distributive trades															Other									Other		Other	
Organisation of trade fairs											Other		Other		Other						Other					Other	
Car rental	Other					Other									Other		Other									Other	
Travel agencies						Other									Other											Other	
Services in the field of tourism	Other			Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other
Leisure services	Other	Both	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other
Sports centres	Other	Both	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other
Cultural services	Other	Both	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other
Amusement parks	Other	Both	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other
Supply of electricity																	Other					Other					
Telecommunication	Other		Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other
Postal Services			Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other

Legend				
Monetary support	Other type of support	Both	No	n.a.

Source: Authors' elaboration

Type of services

Residents with disabilities

In most Member States, **preferential conditions to residents with disabilities** are offered in the following services:⁴¹⁰

- Public and private transport;
- Leisure and sport;
- Parking;
- Amusement parks;
- Tourism;
- Sport, leisure and cultural services;
- Private transport.

Whether preferential conditions are offered on a voluntarily or mandatory basis depends on both the type of services and providers concerned. More specifically, preferential conditions are usually provided on a voluntary basis for the majority of internal market services.⁴¹¹ Services for which preferential conditions are often provided on a mandatory basis include public transport and parking services, as well as recruitment services, supply of electricity and gas, as well as postal services and telecommunication.⁴¹² Finally, for some services (e.g. cultural services, tourism), preferential conditions are sometimes provided on both voluntary and mandatory basis, depending on the specific service provider.

Yet, even when granted on a mandatory basis, preferential conditions may be still not universal, i.e. they are offered only by some providers within the concerned sector (e.g. in France, reduced tickets apply to some public transport services and not to all).⁴¹³ On the other hand, in Malta, public entities are obliged to offer preferential services to EU Cardholders as the National Disability Card is a gateway card for government services.

Further complexity is observed in some federal or regional Member States, such as Austria and Italy, where regional and local legislation provides for additional preferential conditions besides those granted based on a mandatory basis at the national level.⁴¹⁴

In order to obtain preferential conditions, persons with disabilities are generally requested to show a national disability card or certificate. Yet, exceptions apply across the Member States. For instance, in Hungary, where preferential conditions are offered on a voluntarily basis, in addition to the national disability certificate some service providers ask for a card certifying membership of a disability CSO. In the Netherlands, preferential conditions for using public transport services are offered to holders of the public transport assistance card, which is obtained through an assessment procedure.⁴¹⁵

Table 61 below provides an overview of services for which preferential conditions are offered across the Member States to residents with disabilities, along with information on the nature of such conditions, i.e. whether they are offered on a mandatory or voluntary basis.

⁴¹⁰ Input from country experts (See Annex VI).

⁴¹¹ Input from country experts (See Annex VI); Survey targeted at NCAs Q2.10 (See Annex I).

⁴¹² Input from country experts (See Annex VI); Survey targeted at NCAs Q2.8; Survey targeted at other relevant public authorities Q2.8 (See Annex I).

⁴¹³ Input from country experts (See Annex VI).

⁴¹⁴ Input from country experts (See Annex VI).

⁴¹⁵ Persons with disabilities from other Member States holding a card with similar conditions, this will be accepted as equal to the Dutch card.

Non-residents with disabilities

Regarding **preferential conditions offered also to persons with disabilities from other Member States**, available information is very limited and mostly consists of anecdotal evidence. Yet, the data collection undertaken at the Member State level still provides some interesting information. Overall, in most Member States (e.g. CZ, EL, IE, IT, LU, LV, NL, PT, SK, SE), **most service providers offer preferential conditions to persons with disabilities from other countries on a voluntary basis**. Only in few Member States (e.g. FI) all preferential conditions offered to residents are also provided to non-residents with disabilities. In **Greece** and **Lithuania**, non-residents with disabilities can access for free various archaeological areas and use public transport by demonstrating their disability card.⁴¹⁶

Furthermore, in **the eight Member States that participated in the pilot EU Disability Card** (i.e. BE, CY, EE, FI, IT, MT, RO, SI), **preferential conditions are offered to all persons with disabilities from these eight countries**. However, there are differences and exceptions also among these countries. For instance, in Estonia, all persons with disabilities can access preferential conditions when using culture, leisure, sports, and transport services, regardless of their country of origin. On the contrary, in Malta, the **Malta Public Transport** only offers preferential conditions to holders of the EU Disability Card marked with 'MT'.

In some Member States, (e.g. BE, CY, HR, PL, PT, SE), preferential conditions are offered also to assistants of persons with disabilities from other Member States.

To conclude, survey results confirm that there is very limited offer of preferential conditions to non-residents as compared to residents with disabilities.⁴¹⁷

Table below provides for an overview of the preferential conditions offered to non-residents with disabilities.

⁴¹⁶ Input from country experts (See Annex VI).

⁴¹⁷ Survey targeted at NCAs Q2.8; Survey targeted at other relevant public authorities Q2.8; Survey targeted at NCAs Q2.10; Survey targeted at other relevant PAs Q2.10 (see Annex I).

Table 62 – Mapping of services for which preferential condition are offered to non-residents with disabilities across the Member States

Services	AT	BE	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IE	IT	LT	LU	LV	MT	NL	PL	PT	RO	SE	SI	SK
Public transport	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Private transport	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Parking	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Business services	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Facilities management	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Advertising	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Recruitment services	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Services to commercial agents	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Services provided both to business and consumers	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Real estate services	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Distributive trades	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Organisation of trade fairs	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Car rental	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Travel agencies	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Services in the field of tourism	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Leisure services	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Sports centres	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Cultural services	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Amusement parks	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Supply of electricity	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Telecommunication	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Postal Services	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes

Legend
 Yes No n.a.

Source: Authors' own elaboration

Annex VII – Overview of survey responses

Introduction

This annex shows the responses received to relevant responses to the online surveys targeting persons with disabilities, national public authorities, national and EU-level CSOs.

Survey targeted at persons with disabilities

Question	Options	Replies
Q1.6 Do you have an EU Parking Card for persons with disabilities?	Yes	15
	No	9
Q2.4 Based on your experience, to what extent do you face the following obstacles when travelling to another Member State for a short-term stay?	You receive no or only few preferential conditions when accessing certain services	<ul style="list-style-type: none"> • Not at all: 6 • Small extent: 4 • Moderate extent: 6 • High extent: 1
Q2.5 To what extent do you feel discouraged to travel to other Member States because of the following obstacles?	You receive no or only few preferential conditions when accessing certain services	<ul style="list-style-type: none"> • Not at all: 8 • Small extent: 2 • Moderate extent: 4 • High extent: 1 • Very high extent: 2
	Your national disability cards and certificates are not recognise	<ul style="list-style-type: none"> • Not at all: 8 • Small extent: 3 • Moderate extent: 2 • High extent: 1 • Very high extent: 3
Q2.6 Have you ever faced the following circumstances?	Your national disability status has not been accepted in other Member States	<ul style="list-style-type: none"> • Not at all: 10 • Small extent: 2 • Moderate extent: 1 • High extent: 2 • Very high extent: 2
	You have been denied access to preferential conditions in relation to certain services when travelling to other Member States for a short-term stay	<ul style="list-style-type: none"> • Not at all: 10 • Small extent: 2 • Moderate extent: 1 • High extent: 2 • Very high extent: 2
	Your accompanying person has been denied access to preferential conditions in relation to certain services when travelling to other Member States for a short-term stay	<ul style="list-style-type: none"> • Not at all: 10 • Small extent: 2 • Moderate extent: 1 • High extent: 2 • Very high extent: 2
Q2.12 In your country, what documents do you need to provide in order to access preferential conditions?	National disability card or certificate	16
	EU parking card for persons with disabilities	12
	European Disability Card	10
	National ID card	4
Q3.1 Are you aware of the EU Parking Card for persons with disabilities?	Yes	16
	No	8

Question	Options	Replies
Q3.2 If you have an EU Parking Card for persons with disabilities, do you make use of it?	Yes, I use it both in my country and in other Member States	8
	Yes, I use it in other Member States	6
	No, I do not use it	1
Q3.3 Based on your experience, to what extent does the EU Parking Card facilitates your travels to other Member States?	Not at all	8
	Small extent	2
	Moderate extent	6
	High extent	6
	Very high extent	2
Q3.4 To what extent do you think that the following issues affect the implementation of the EU Parking Card for persons with disabilities?	National differences in terms of rights granted by the card	<ul style="list-style-type: none"> • Not at all: 6 • Small extent: 3 • Moderate extent: 4 • High extent: 7 • Very high extent: 3
	Limited recognition of the card across Member States	<ul style="list-style-type: none"> • Not at all: 6 • Small extent: 4 • Moderate extent: 3 • High extent: 8 • Very high extent: 3
Q3.5 To what extent do you think that the above issues hinder the following elements?	Your ability to easily access different premises	<ul style="list-style-type: none"> • Not at all: 6 • Small extent: 5 • Moderate extent: 4 • High extent: 6 • Very high extent: 3
	Your ability to exercise your right to mobility in the EU	<ul style="list-style-type: none"> • Not at all: 8 • Small extent: 5 • Moderate extent: 3 • High extent: 5 • Very high extent: 3
Q3.6 Have you ever faced problems linked to the non-recognition of your EU Parking Card in another Member State?	Never	12
	Often	3
Q4.1 To what extent do you think that EU action (compared to what individual countries could do) is needed to ensure the following elements?	Facilitate mutual recognition of disability status among Member States	<ul style="list-style-type: none"> • Not at all: 2 • Small extent: 1 • Moderate extent: 4 • High extent: 5 • Very high extent: 12
	Facilitate access to those services offering preferential conditions for persons with disabilities in all Member States	<ul style="list-style-type: none"> • Not at all: 1 • Small extent: 1 • Moderate extent: 4 • High extent: 6 • Very high extent: 12
	Improve the implementation of the EU parking card for persons with disabilities	<ul style="list-style-type: none"> • Not at all: 1 • Small extent: 1 • Moderate extent: 2 • High extent: 8 • Very high extent: 12

Question	Options	Replies
Q5.7 Do you agree with the following statements?	The European Disability Card and the EU parking card should be merged in one card (electronic and/or physical)	<ul style="list-style-type: none"> • Yes: 16 • No: 8
	The European Disability Card and the EU parking card should be kept separate, but the new European Disability Card should offer the possibility to be used also for parking	<ul style="list-style-type: none"> • Yes: 16 • No: 8
	The eligibility criteria to receive the new European Disability Card should be the same as the EU parking card	<ul style="list-style-type: none"> • Yes: 15 • No: 9

Survey targeted at NCAs and other public authorities

Question	Options	NCAs: Replies	PAs: Replies
Q2.2 In your view, to what extent do persons with disabilities travelling to another Member State for a short-term stay (max. three months) face the following circumstances?	Their national disability cards and certificates are not recognised	<ul style="list-style-type: none"> • Not at all: 2 • Small extent: 4 • Moderate extent: 3 • High extent: 8 • Very high extent: 8 	<ul style="list-style-type: none"> • Not at all: 1 • Small extent: 2 • High extent: 1 • Very high extent: 1
Q2.3 To what extent do you think that the following circumstances represent obstacles for persons with disabilities to exercise their free movement right (i.e. persons with disabilities may be discouraged to travel to other Member States because of such obstacles)?	Their national disability cards and certificates are not recognised	<ul style="list-style-type: none"> • Not at all: 2 • Small extent: 3 • Moderate extent: 3 • High extent: 9 • Very high extent: 8 	<ul style="list-style-type: none"> • Not at all: 1 • Moderate extent: 1 • High extent: 2 • Very high extent: 1
	They receive no or only few preferential conditions when accessing certain services	<ul style="list-style-type: none"> • Not at all: 3 • Small extent: 5 • Moderate extent: 4 • High extent: 8 • Very high extent: 5 	<ul style="list-style-type: none"> • Not at all: 1 • Small extent: 1 • High extent: 2 • Very high extent: 1
Q2.4 To what extent do you think that the following circumstances represent obstacles for persons with disabilities to exercise their right to profit from benefits or special conditions when accessing certain services?	Their national disability cards and certificates are not recognised	<ul style="list-style-type: none"> • Not at all: 2 • Small extent: 3 • Moderate extent: 6 • High extent: 5 • Very high extent: 9 	<ul style="list-style-type: none"> • Not at all: 1 • Small extent: 1 • Moderate extent: 1 • High extent: 2
	They receive no or only few preferential conditions when	<ul style="list-style-type: none"> • Not at all: 2 • Small extent: 3 • Moderate extent: 6 • High extent: 5 • Very high extent: 9 	<ul style="list-style-type: none"> • Not at all: 1 • Small extent: 1 • High extent: 2 • Very high extent: 1

Question	Options	NCA: Replies	PA: Replies
	accessing certain services		
Q2.5 Have you personally or are you aware of a person with disabilities who has faced the following circumstances?	His/her national disability cards and certificates has not been accepted in other Member States	<ul style="list-style-type: none"> • Yes, this is a problem in most Member States: 12 • Yes, but this is a problem only in a few Member States: 12 • No, this is not a problem: 1 	<ul style="list-style-type: none"> • Yes, this is a problem in most Member States: 2 • Yes, but this is a problem only in a few Member States: 2 • No, this is not a problem: 1
Q2.8 Please, per each of the following services, indicate if service providers in your country are requested by law to offer preferential conditions to persons with disabilities (both nationals and from other Member States)?	Nationals with disabilities	<ul style="list-style-type: none"> • Public transport: 17 • Private transport: 10 • Parking: 16 • Car rental: 3 • Travel agencies: 3 • Tourism: 10 • Leisure services: 8 • Sports centres: 9 • Cultural services: 13 • Amusement parks: 7 • Supply of electricity and gas: 14 • Telecommunications: 12 • Postal services: 7 • Business services: 3 • Facilities management: 6 • Advertising: 4 • Recruitment services: 8 • Services of commercial agents: 5 • Services provided both to businesses and consumers (e.g. legal advice): 7 • Real estate services: 6 • Distributive trades: 4 • Organisation of trade fairs: 4 	<ul style="list-style-type: none"> • Public transport: 5 • Private transport: 3 • Parking: 4 • Car rental: 1 • Travel agencies: 1 • Tourism: 1 • Leisure services: 1 • Sports centres: 2 • Cultural services: 3 • Amusement parks: 1 • Supply of electricity and gas: 4 • Telecommunications: 3 • Postal services: 3 • Business services: 1 • Facilities management: 1 • Advertising: 1 • Recruitment services: 3 • Services of commercial agents: 1 • Services provided both to businesses and consumers (e.g. legal advice): 1 • Real estate services: 1 • Distributive trades: 1 • Organisation of trade fairs: 1
	EU citizens with disabilities travelling to your country for short-term stays	<ul style="list-style-type: none"> • Public transport: 6 • Private transport: 2 • Parking: 9 • Car rental: 1 • Travel agencies: 1 • Tourism: 5 • Leisure services: 3 • Sports centres: 2 • Cultural services: 4 • Amusement parks: 4 • Business services: 1 • Facilities management: 2 • Recruitment services: 2 • Services of commercial agents: 1 	<ul style="list-style-type: none"> • Public transport: 1 • Parking: 4 • Sports centres: 1 • Cultural services: 1 • Supply of electricity and gas: 1 • Postal services: 1 • Recruitment services: 1 • Organisation of trade fairs: 0

Question	Options	NCAs: Replies	PAs: Replies
		<ul style="list-style-type: none"> Services provided both to businesses and consumers (e.g. legal advice): 2 	
<p>Q2.10 Please, per each of the following services, indicate if service providers in your country voluntarily offer preferential conditions to persons with disabilities (both nationals and from other Member States)?</p>	<p>Nationals with disabilities</p>	<ul style="list-style-type: none"> Public transport: 16 Private transport: 14 Parking: 14 Car rental: 5 Travel agencies: 7 Tourism: 16 Leisure services: 18 Sports centres: 17 Cultural services: 19 Amusement parks: 17 Supply of electricity and gas: 10 Telecommunications: 8 Postal services: 7 Business services: 6 Facilities management: 5 Advertising: 4 Recruitment services: 8 Services of commercial agents: 5 Services provided both to businesses and consumers (e.g. legal advice): 6 Real estate services: 5 Distributive trades: 4 Organisation of trade fairs: 4 	<ul style="list-style-type: none"> Public transport: 1 Private transport: 2 Parking: 3 Car rental: 3 Travel agencies: 4 Tourism: 4 Leisure services: 5 Sports centres: 5 Cultural services: 5 Amusement parks: 5 Supply of electricity and gas: 4 Telecommunications: 3 Postal services: 4 Business services: 3 Facilities management: 4 Advertising: 2 Recruitment services: 2 Services of commercial agents: 3 Services provided both to businesses and consumers (e.g. legal advice): w4 Real estate services: 3 Distributive trades: 4 Organisation of trade fairs: 3
	<p>EU citizens with disabilities travelling to your country for short-term stays</p>	<ul style="list-style-type: none"> Public transport: 8 Private transport: 3 Parking: 4 Car rental: 2 Travel agencies: 2 Tourism: 11 Leisure services: 7 Sports centres: 7 Cultural services: 8 Amusement parks: 11 Supply of electricity and gas: 1 Business services: 1 Facilities management: 1 	<ul style="list-style-type: none"> Private transport: 1 Parking: 1 Car rental: 1 Travel agencies: 1 Tourism: 1 Leisure services: 1 Sports centres: 1 Cultural services: 1 Amusement parks: 1 Supply of electricity and gas: 1 Business services: 1 Facilities management: 1 Advertising: 1 Recruitment services: 1 Services of commercial agents: 1 Services provided both to businesses and consumers (e.g. legal advice): 1

Question	Options	NCA: Replies	PA: Replies
			<ul style="list-style-type: none"> Real estate services: 1 Distributive trades: 1 Organisation of trade fairs: 1
Q2.13 What documents give persons with disabilities access to preferential conditions in your country?	National disability card or certificate of my country	20	5
	EU parking card for persons with disabilities	16	4
	European Disability Card	10	1
	Other (please specify)	6	1
	National disability card or certificate irrespective of the EU Member State where it was issued	4	0
	National ID card	3	0
	No documents needed	1	0
Q3.1 If a national disability card/certificate exists in your country, are the eligibility criteria for obtaining it the same as the ones for obtaining the EU Parking Card for persons with disabilities?	Yes	10	3
	No	15	2
Q3.2 To what extent do you think that the EU Parking Card for persons with disabilities has effectively reached the following objectives?	Ensuring mutual recognition of the card across Member States	<ul style="list-style-type: none"> Not at all: 3 Small extent: 1 Moderate extent: 5 High extent: 8 Very high extent: 8 	<ul style="list-style-type: none"> Not at all: 1 Very high extent: 4
	Facilitating the exercises of the free movement rights for persons with disability	<ul style="list-style-type: none"> Not at all: 3 Small extent: 1 Moderate extent: 7 High extent: 8 Very high extent: 6 	<ul style="list-style-type: none"> Not at all: 1 Moderate extent: 1 High extent: 1 Very high extent: 2
Q3.4 To what extent do you think that the following mechanisms are effective to tackle fraudulent use of the EU Parking Card?	Specific security features on the card (e.g. holograms, QR code, barcode, etc.)	<ul style="list-style-type: none"> Not at all: 2 Small extent: 1 Moderate extent: 9 High extent: 6 Very high extent: 7 	<ul style="list-style-type: none"> Not at all: 1 Small extent: 1 High extent: 1 Very high extent: 2
Q3.5 To what extent do you think that the following mechanisms are effective to tackle forgery of the EU Parking Card?	Specific security features on the card (e.g. holograms, QR	<ul style="list-style-type: none"> Not at all: 3 Moderate extent: 6 High extent: 8 Very high extent: 8 	<ul style="list-style-type: none"> Not at all: 2 Moderate extent: 1 High extent: 1 Very high extent: 1

Question	Options	NCA: Replies	PA: Replies
	code, barcode, etc.)		
Q3.6 To what extent do you think that the following issues are relevant/apply/linked with the implementation of the EU Parking Card for persons with disabilities?	National differences in terms of validity period of the card	<ul style="list-style-type: none"> • Not at all: 5 • Small extent: 8 • Moderate extent: 8 • High extent: 2 • Very high extent: 2 	<ul style="list-style-type: none"> • Not at all: 3 • Very high extent: 2 •
	National differences in the card's design	<ul style="list-style-type: none"> • Not at all: 5 • Small extent: 6 • Moderate extent: 9 • High extent: 3 • Very high extent: 2 	<ul style="list-style-type: none"> • Not at all: 1 • High extent: 2 • Very high extent: 2
	Limited recognition of the card across Member States	<ul style="list-style-type: none"> • Not at all: 4 • Small extent: 4 • Moderate extent: 4 • High extent: 7 • Very high extent: 6 	<ul style="list-style-type: none"> • Not at all: 1 • Small extent: 1 • Moderate extent: 1 • High extent: 2
	National differences in terms of rights granted by the card	<ul style="list-style-type: none"> • Not at all: 4 • Small extent: 2 • Moderate extent: 11 • High extent: 4 • Very high extent: 4 	<ul style="list-style-type: none"> • Not at all: 1 • High extent: 4
Q3.7 To what extent do you think that the current weaknesses of the EU Parking Card for persons with disabilities have the following impacts?	Increasing the hassle/burden of obtaining information about the different parking conditions for persons with disability	<ul style="list-style-type: none"> • Not at all: 5 • Small extent: 6 • Moderate extent: 11 • High extent: 3 	<ul style="list-style-type: none"> • Not at all: 1 • Small extent: 1 • High extent: 3
Q3.10 In your view, to what extent do you agree or disagree that the EU Parking Card for persons with disabilities provides greater benefits than if different parking cards had continued to be used?	Not at all	2	2
	Strongly disagree	1	0
	Disagree	2	0
	Agree	8	3
Q3.11 Based on your knowledge, to what extent do you agree or disagree that the adoption of the EU Parking Card for persons with disabilities entailed costs for national authorities in charge of managing and issuing the card in your country?	Not at all	4	1
	Strongly disagree	2	0

Question	Options	NCA: Replies	PA: Replies
	Disagree	8	1
	Agree	9	2
	Strongly agree	2	1
Q3.12 To what extent do you agree or disagree that the benefits linked with the adoption of the EU parking card for persons with disabilities have overcome the related costs?	Not at all	2	0
	Strongly disagree	1	0
	Disagree	6	2
	Agree	9	2
	Strongly agree	7	1
Q3.13 To what extent do you agree or disagree that the EU Parking Card for persons with disabilities is still relevant to current needs of persons with disabilities in the EU?	Not at all	2	1
	Strongly disagree	1	0
	Disagree	3	0
	Agree	8	4
	Strongly agree	11	0
Q4.1 To what extent do you think that EU action (compared to what individual countries could do alone) is needed to achieve the following objectives?	Facilitate mutual recognition of disability among Member States	<ul style="list-style-type: none"> • Not at all: 2 • Small extent: 1 • Moderate extent: 2 • High extent: 10 • Very high extent: 10 	<ul style="list-style-type: none"> • Not at all: 2 • High extent: 2 • Very high extent: 1
	Improve the implementation of the EU Parking card for persons with disabilities	<ul style="list-style-type: none"> • Not at all: 2 • Small extent: 2 • Moderate extent: 9 • High extent: 5 • Very high extent: 7 	<ul style="list-style-type: none"> • Not at all: 1 • Moderate extent: 1 • High extent: 2 • Very high extent: 1

Survey targeted at EU-level CSOs

Question	Options	Replies
Q2.1 In your view, to what extent do persons with disabilities travelling to another Member State for a short-term stay (max. three months) face the following circumstances?	Their national disability cards and certificates are not recognised	<ul style="list-style-type: none"> • Small extent: 1 • Moderate extent: 2 • High extent: 2 • Very high extent: 5
	They receive no or only few preferential conditions when accessing certain services	<ul style="list-style-type: none"> • Small extent: 2 • Moderate extent: 2 • High extent: 2 • Very high extent: 4
Q2.2 To what extent do you think that the following circumstances represent obstacles for persons with disabilities	Their national disability cards and certificates are not recognised	<ul style="list-style-type: none"> • Small extent: 1 • Moderate extent: 1 • High extent: 4

Question	Options	Replies
to exercise their free movement right (i.e. persons with disabilities may be discouraged to travel to other Member States because of such obstacles)?		<ul style="list-style-type: none"> • Very high extent: 4
	They receive no or only few preferential conditions when accessing certain services	<ul style="list-style-type: none"> • Small extent: 1 • Moderate extent: 4 • High extent: 1 • Very high extent: 4
Q2.3 To what extent do you think that the following circumstances represent obstacles for persons with disabilities to exercise their right to profit from benefits or special conditions when accessing certain services?	Their national disability cards and certificates are not recognised	<ul style="list-style-type: none"> • Small extent: 1 • Moderate extent: 1 • High extent: 4 • Very high extent: 4
	They receive no or only few preferential conditions when accessing certain services	<ul style="list-style-type: none"> • Small extent: 1 • Moderate extent: 4 • High extent: 1 • Very high extent: 4
Q2.4 Have you personally or are you aware of a person with disabilities who has faced the following circumstances?	His/her national disability cards and certificates has not been accepted in other Member States	<ul style="list-style-type: none"> • Yes, this is a problem in most Member States: 7 • Yes, but this is a problem only in a few Member States: 2 • No, this is not a problem: 1
Q3.1 To what extent do you think that the EU Parking Card for persons with disabilities has effectively reached the following objectives?	Ensuring mutual recognition of the card across Member States	<ul style="list-style-type: none"> • Small extent: 1 • Moderate extent: 3 • High extent: 4 • Very high extent: 2
	Facilitating the exercises of the free movement rights for persons with disability	<ul style="list-style-type: none"> • Small extent: 1 • Moderate extent: 4 • High extent: 4 • Very high extent: 1
Q3.2 To what extent do you think that the following mechanisms are effective to tackle fraudulent use of the EU Parking Card?	Specific security features on the card (e.g. holograms, QR code, barcode, etc.)	<ul style="list-style-type: none"> • Moderate extent: 4 • High extent: 4 • Very high extent: 2
Q3.3 To what extent do you think that the following mechanisms are effective to tackle forgery of the EU Parking Card?	Specific security features on the card (e.g. holograms, QR code, barcode, etc.)	<ul style="list-style-type: none"> • Moderate extent: 3 • High extent: 4 • Very high extent: 3
Q3.4 To what extent do you think that the following issues are relevant/apply/linked with the implementation of the EU Parking Card for persons with disabilities?	National differences in terms of validity period of the card	<ul style="list-style-type: none"> • Not at all: 1 • Moderate extent: 4 • High extent: 4 • Very high extent: 1
	Limited recognition of the card across Member States	<ul style="list-style-type: none"> • Moderate extent: 4 • High extent: 3 • Very high extent: 3
	National differences in terms of rights granted by the card	<ul style="list-style-type: none"> • Moderate extent: 3 • High extent: 3 • Very high extent: 4
	National differences in the card's design	<ul style="list-style-type: none"> • Moderate extent: 5 • High extent: 3 • Very high extent: 2

Question	Options	Replies
Q3.5 To what extent do you think that the current weaknesses of the EU Parking Card for persons with disabilities have the following impacts?	Making it more difficult for persons with disabilities to access different premises	<ul style="list-style-type: none"> Moderate extent: 5 High extent: 1 Very high extent: 4
	Increasing the hassle/burden of obtaining information about the different parking conditions for persons with disability	<ul style="list-style-type: none"> Moderate extent: 5 High extent: 3 Very high extent: 2
Q3.8 In your view, to what extent do you agree or disagree that the EU Parking Card for persons with disabilities provides greater benefits than if different parking cards had continued to be used?	Agree	2
	Strongly agree	8
Q3.10 To what extent do you agree or disagree that the benefits linked with the adoption of the EU parking card for persons with disabilities have overcome the related costs?	Strongly disagree	1
	Disagree	1
	Agree	4
	Strongly agree	4
Q3.11 To what extent do you agree or disagree that the EU Parking Card for persons with disabilities is still relevant to current needs of persons with disabilities in the EU?	Disagree	1
	Agree	2
	Strongly agree	7
Q4.1 To what extent do you think that EU action (compared to what individual countries could do alone) is needed to achieve the following objectives?	Facilitate mutual recognition of disability among Member States	<ul style="list-style-type: none"> High extent: 2 Very high extent: 8
	Improve the implementation of the EU Parking card for persons with disabilities	<ul style="list-style-type: none"> Moderate extent: 2 High extent: 3 Very high extent: 5
	Facilitate access to those services offering preferential conditions for persons with disabilities in all Member States	<ul style="list-style-type: none"> Moderate extent: 1 High extent: 3 Very high extent: 6

Survey targeted at national CSOs

Question	Options	Replies
Q2.2 In your view, to what extent do persons with disabilities travelling to another Member State for a short-term stay (max. three months) face the following obstacles?	Their national disability cards and certificates are not recognised	<ul style="list-style-type: none"> Not at all: 1 Small extent: 6 Moderate extent: 4 High extent: 4 Very high extent: 8
	They receive no or only few preferential conditions when accessing certain services	<ul style="list-style-type: none"> Not at all: 3 Small extent: 4 Moderate extent: 6 High extent: 5

Question	Options	Replies
		<ul style="list-style-type: none"> • Very high extent: 5
Q2.3 To what extent do you think that the following circumstances represent obstacles for persons with disabilities to exercise their free movement right (i.e. persons with disabilities may be discouraged to travel to other Member States because of such obstacles)?	Their national disability cards and certificates are not recognised	<ul style="list-style-type: none"> • Not at all: 2 • Small extent: 4 • Moderate extent: 7 • High extent: 5 • Very high extent: 5
	They receive no or only few preferential conditions when accessing certain services	<ul style="list-style-type: none"> • Small extent: 7 • Moderate extent: 4 • High extent: 8 • Very high extent: 4
	There is no publicly available information on preferential conditions offered to EU citizens with disabilities across the Member States	<ul style="list-style-type: none"> • Small extent: 5 • Moderate extent: 5 • High extent: 7 • Very high extent: 6
Q2.4 To what extent do you think that the following circumstances represent obstacles for persons with disabilities to exercise their right to profit from benefits or special conditions when accessing certain services?	Their national disability cards and certificates are not recognised	<ul style="list-style-type: none"> • Not at all: 2 • Small extent: 3 • Moderate extent: 5 • High extent: 4 • Very high extent: 9
	They receive no or only few preferential conditions when accessing certain services	<ul style="list-style-type: none"> • Small extent: 3 • Moderate extent: 9 • High extent: 5 • Very high extent: 6
Q2.13 What documents give persons with disabilities access to preferential conditions in your country?	European Disability Card	5
	National disability card or certificate of my country	8
	EU parking card for persons with disabilities	4
	National disability card or certificate irrespective of the EU Member State where it was issued	1
Q3.2 To what extent do you think that the EU Parking Card for persons with disabilities has effectively reached the following objectives?	Ensuring mutual recognition of the card across Member States	<ul style="list-style-type: none"> • Not at all: 3 • Small extent: 3 • Moderate extent: 4 • High extent: 12 • Very high extent: 1
	Facilitating the exercises of the free movement rights for persons with disability	<ul style="list-style-type: none"> • Not at all: 2 • Small extent: 4 • Moderate extent: 9 • High extent: 7 • Very high extent: 1
Q3.4 To what extent do you think that the following mechanisms are effective to tackle fraudulent use of the EU Parking Card?	Specific security features on the card (e.g. holograms, QR code, barcode, etc.)	<ul style="list-style-type: none"> • Not at all: 2 • Small extent: 4 • Moderate extent: 2 • High extent: 9 • Very high extent: 6
Q3.5 To what extent do you think that the following mechanisms are effective to tackle forgery of the EU Parking Card?	Specific security features on the card (e.g. holograms, QR code, barcode, etc.)	<ul style="list-style-type: none"> • Not at all: 2 • Small extent: 2 • High extent: 11 • Very high extent: 8

Question	Options	Replies
Q3.6 To what extent do you think that the following issues are relevant/apply/linked with the implementation of the EU Parking Card for persons with disabilities?	National differences in terms of validity period of the card	<ul style="list-style-type: none"> • Not at all: 3 • Small extent: 5 • Moderate extent: 4 • High extent: 9 • Very high extent: 2
	National differences in the card's design	<ul style="list-style-type: none"> • Not at all: 2 • Small extent: 5 • Moderate extent: 7 • High extent: 4 • Very high extent: 5
	Limited recognition of the card across Member States	<ul style="list-style-type: none"> • Not at all: 2 • Small extent: 3 • Moderate extent: 9 • High extent: 4 • Very high extent: 5
	National differences in terms of rights granted by the card	<ul style="list-style-type: none"> • Not at all: 2 • Small extent: 5 • Moderate extent: 5 • High extent: 6 • Very high extent: 5
Q3.7 To what extent do you think that the current weaknesses of the EU Parking Card for persons with disabilities have the following impacts?	Making it more difficult for persons with disabilities to access different premises	<ul style="list-style-type: none"> • Not at all: 1 • Small extent: 3 • Moderate extent: 5 • High extent: 8 • Very high extent: 6
	Increasing the hassle/burden of obtaining information about the different parking conditions for persons with disability	<ul style="list-style-type: none"> • Not at all: 1 • Small extent: 4 • Moderate extent: 5 • High extent: 8 • Very high extent: 5
Q3.10 In your view, to what extent do you agree or disagree that the EU Parking Card for persons with disabilities provides greater benefits than if different parking cards had continued to be used?	Not at all	2
	Strongly disagree	1
	Disagree	4
	Agree	8
Q3.12 To what extent do you agree or disagree that the benefits linked with the adoption of the EU Parking Card for persons with disabilities have overcome the related costs?	Not at all	4
	Strongly disagree	3
	Disagree	4
	Agree	9
Q4.1 To what extent do you think that EU action (compared to what individual countries could do alone) is needed to achieve the following objectives?	Facilitate mutual recognition of disability status among Member States	<ul style="list-style-type: none"> • Not at all: 1 • Moderate extent: 2 • High extent: 12 • Very high extent: 8

Question	Options	Replies
	Improve the implementation of the EU Parking card for persons with disabilities	<ul style="list-style-type: none"> • Not at all: 1 • Small extent: 1 • Moderate extent: 5 • High extent: 9 • Very high extent: 7
	Facilitate access to those services offering preferential conditions for persons with disabilities in all Member States	<ul style="list-style-type: none"> • Not at all: 1 • Small extent: 1 • Moderate extent: 3 • High extent: 12 • Very high extent: 6
Q3.13 To what extent do you agree or disagree that the EU Parking Card for persons with disabilities is still relevant to current needs of persons with disabilities in the EU?	Not at all	1
	Strongly disagree	2
	Disagree	1
	Agree	10
	Strongly agree	9

Survey targeted at service providers

Question	Options	Replies
Q3.4 To what extent do you think that offering preferential conditions to persons with disabilities contributes to increasing how often they access the services provided by your organisation?	Persons with disabilities from your country	<ul style="list-style-type: none"> • Moderate extent: 1 • High extent: 1
	Persons with disabilities from other EU Member States	<ul style="list-style-type: none"> • Moderate extent: 1 • High extent: 1

Questionnaire on costs targeted at service providers

Question	Options	Replies
Q8 Can you please estimate, on a monthly basis on average, what share of your customers is represented by customers with disabilities from other EU Member States, travelling for short-term stays (less than 3 months)?	Less than 1%	13
	1 to 5%	2
	5 to 10%	1
	10 to 20%	0
	20 to 30%	0
	30 to 40%	1
	More than 40%	0
	I don't know	6
Q9 Can you please estimate, on average, how many additional persons access your service/offer together with a person with disability (members of the family, friends, etc.)?	None	7

Question	Options	Replies
	1	7
	2	1
	3	2
	4	0
	5 or more	2
	I don't know	4
Q10 To what extent do you receive requests or claims from persons with disabilities on whether they have access to preferential conditions for the services offered by your organisation?	Not at all	4
	Small extent	9
	Moderate extent	7
	High extent	2
	Very high extent	1
Q34 To what extent do you think the European Disability Card would simplify the process of recognizing the disability status of customers with disability from other EU Member States?	Not at all	1
	Small extent	5
	Moderate extent	1
	High extent	2
	Very high extent	9
Q38 In a month, can you estimate the average cost per person of offering preferential conditions to customers with disabilities? Please consider costs of offering discounted prices (which would be equivalent to the average amount of the discount), personalised services (e.g. guided tours, personal assistance, priority lines) and any other costs which you incur for each customer with disabilities.	Less than 1 Euro per person	1
	1 to 5 Euros per person	5
	6 to 10 Euros per person	1
	11-20 Euros per person	5
	21 to 30 Euros per person	6
	31 to 40 Euros per person	0
	41 to 50 Euros per person	1
	51 to 60 Euros per person	0
	61 to 70 Euros per person	0
	71 to 80 Euros per person	1
	81 to 90 Euros per person	0
	91 to 100 Euros per person	1

Question	Options	Replies
	More than 100 Euros per person	2
Q39 What do you think would be the change in the following costs, if the European Disability Card was introduced:	Cost of training staff on the existence of preferential conditions and the recognition of those who can access them	<ul style="list-style-type: none"> • Relevant decrease in costs: 2 • Small decrease in costs: 0 • No or negligible change in costs: 7 • Small increase in costs: 0 • Relevant increase in costs: 3 • I don't know: 6
	Cost of training staff for the provision of personalised services	<ul style="list-style-type: none"> • Relevant decrease in costs: 1 • Small decrease in costs: 1 • No or negligible change in costs: 7 • Small increase in costs: 6 • Relevant increase in costs: 2 • I don't know: 7
	Cost of recruiting additional or specialised staff	<ul style="list-style-type: none"> • Relevant decrease in costs: 1 • Small decrease in costs: 1 • No or negligible change in costs: 7 • Small increase in costs: 4 • Relevant increase in costs: 4 • I don't know: 6
	Yearly cost of storing information on Card use (that is, keeping track of the number of customers with disabilities using the preferential conditions)	<ul style="list-style-type: none"> • Relevant decrease in costs: 0 • Small decrease in costs: 2 • No or negligible change in costs: 8 • Small increase in costs: 4 • Relevant increase in costs: 4 • I don't know: 5
Q40 For each of the following statements, please indicate your level of agreement:	Offering preferential conditions to persons with disabilities increases their demand for services offered by my organisation.	<ul style="list-style-type: none"> • Strongly agree: 8 • Somewhat agree: 7 • Neither agree nor disagree: 4 • Somewhat disagree: 3 • Strongly disagree: 1
	There is potential to improve the offer of preferential conditions to customers with disabilities (e.g. through cooperation with public authorities, specific strategies, etc.).	<ul style="list-style-type: none"> • Strongly agree: 9 • Somewhat agree: 9 • Neither agree nor disagree: 0 • Somewhat disagree: 2 • Strongly disagree: 3



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