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COMMISSION STAFF WORKING DOCUMENT

IMPACT ASSESSMENT REPORT

Accompanying the document

Proposal for a Directive of the European Parliament and of the Council

establishing the European Disability Card and the European Parking Card for persons with disabilities

{COM(2023) 512 final} - {SEC(2023) 305 final} - {SWD(2023) 289 final} -
{SWD(2023) 291 final}

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Glossary

Term or acronym	Meaning or definition
CEA	Cost-Effectiveness Analysis
CMI	Carte mobilité inclusion (Mobility inclusion card)
CSO	Civil Society Organisation
DG EMPL	Directorate-General for Employment, Social Affairs and Inclusion
DG GROW	Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs
DG JUST	Directorate-General for Justice and Consumers
EDC	European Disability Card
EDF	European Disability Forum
EP	European Parliament
EUCFR	Charter of Fundamental Rights of the EU
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
NCA	National Competent Authority
PWG	Project Working Group
REC	Rights, Equality and Citizenship Programme (2014-2020)
SME	Small and Medium-sized Enterprise
SDG	Sustainable Development Goal
SO	Specific Objectives
SOLVIT	Solutions to problems with your EU rights
SWD	Staff Working Document
TFEU	Treaty on the Functioning of the EU
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: POLITICAL AND LEGAL CONTEXT

The Treaty on the Functioning of the EU (TFEU) and the **Charter of Fundamental Rights of the EU (EUCFR)** establish equality as a cornerstone of EU policies, and the fundamental right to free movement of persons is established by Article 21 of TFEU and Article 45 of EUCFR. Article 56 TFEU prohibits restrictions on freedom to provide services to nationals of Member States who are established in a Member State other than that of the person for whom the services are intended, as well as restrictions to the freedom to receive services from a provider established in another Member State[1]. Around 25% of the EU population have some form of disability (2021).[2] While there was significant progress over the last decades in terms of policy and legislation, persons with disabilities still face barriers to their full participation in society. In 2019 for example, over half of respondents with disabilities say they felt discriminated against[3]. To improve this situation, in 2021 the Commission adopted the **Strategy for the Rights of Persons with Disabilities 2021-2030**. It contributes to the implementation of several principles of the **European Pillar of Social Rights,** of the **United Nations Convention on the Rights of Persons with Disabilities (UNCRPD)**, ratified by the EU and all its Member States, to the implementation of the 2030 United Nations Agenda **Sustainable Development Goals.**

One of the Strategy's flagship initiatives is the creation of a European Disability Card. It is included in the **Commission Work Programme 2023** and the **Communication on the Conference on the Future of Europe**. The **European Parliament** called for the Card in three resolutions. In its Resolution of 18 June 2020 on the European Disability Strategy post-2020 it asked the Commission to expand the existing pilot project of the EU Disability Card and to ensure that the EU parking card for people with disabilities is fully observed in all Member States. The EP welcomed the initiative on the European Disability Card in its Resolution of 7 October 2021 on the protection of persons with disabilities through petitions and its Resolution of 13 December 2022 towards equal rights for persons with disabilities, advocating for a legally binding and ambitious initiative, covering a range of different areas beyond culture, leisure and sport. The **European Economic and Social Committee** adopted the supportive Opinion SOC/765-EESC. The **Member States** appear generally in favour of the initiative.

The European Disability Card builds on two instruments already in place: the EU parking card and the EU Disability Card pilot. The **EU parking card for people with disabilities**[4] was created by Council recommendation 98/376/EC and amended in 2008[5]. It 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. The **EU Disability Card** pilot project, tested following the EU Citizenship Report 2013[6], was carried out in eight Member States (Belgium, Cyprus, Estonia, Finland, Italy, Malta, Romania and Slovenia) in 2016-2018 and remained in place after the end of the project. The pilot provides a common format for a card for

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[1] C-286/82, *Luisi and Carbone v Ministero del Tesoro*, ECLI:EU:C:1984:35.
[2] Eurostat database, hlth_silc_12. Available at: link.
[3] Special Eurobarometer 493, Discrimination in the EU, May 2019.
[4] https://europa.eu/youreurope/citizens/travel/transport-disability/parking-card-disabilities-people/index_en.htm
[5] It was amended to extend its application by reason of accession, but no changes were made to its content.
[6] EU citizenship report (2013), Directorate-General for Justice, which included under Action 6: *"The Commission will facilitate the mobility of persons with disabilities within the EU by supporting, in 2014, the development of a mutually recognised EU disability card to ensure equal access within the EU to certain specific benefits (mainly in the areas of transport, tourism, culture and leisure)".*

voluntary mutual recognition among the participating Member States of the disability status, as established in accordance with national eligibility criteria or rules, for access to benefits and services in the areas of culture, leisure, sport and, in some countries, transport[7].

This initiative aims to make it easier for persons with disabilities to exercise their **right to free movement within the EU**, for the purposes of benefiting from available preferential conditions when accessing services, with or without remuneration, under equal conditions to residents with disabilities[8]. It will also contribute to the implementation of the **2030 United Nations Agenda for Sustainable Development**, as Goal 8 encourages policies that promote sustainable tourism and local culture; Goal 10 aims to reduce inequalities; and Goal 11 aims at providing access to safe, affordable, accessible and sustainable transport systems for all.

The European Disability Card could facilitate the application of the EU passenger rights legislation adopted between 2004 and 2021 that is applicable to four transport modes: aviation, rail, waterborne, and bus and coach transport.[9] The initiative is also in line with the recent Directive (EU) 2022/362[10], which enables the Member States to provide for reduced tolls or user charges as well as exemptions from the obligation to pay tolls or user charges for any vehicle used or owned by persons with disabilities as concerns roads subject to road charging.

2. PROBLEM DEFINITION

People in the EU are increasingly mobile and all have the right to move freely in the EU and to access services in all Member States. Nevertheless, in practice persons with disabilities still face hurdles that may deter or discourage them from moving freely given physical, cultural, environmental and social barriers.[11] A recent Eurobarometer survey highlighted the difficulty of finding information on the accessibility of the destination for persons with disabilities or reduced mobility (39% find this difficult).[12] When travelling to other Member States, persons with

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[7] The Study assessing the implementation of the pilot action on the EU Disability Card and associated benefits concluded that there is potential for larger-scale action.

[8] The conditions for exercising this right are set out in the Free Movement Directive (2004/38/EC), the Directive on services in the internal market (2006/123/EC), and the Regulation (EU) 2018/302 on addressing unjustified geo-blocking and other forms of discrimination in cross-border transactions between a trader and a customer relating to the sales of goods and the provision of services within the Union.

[9] Regulation (EC) No 1107/2006 concerning the rights of disabled persons and persons with reduced mobility when travelling by air, Regulation (EU) No 1177/2010 concerning the rights of passengers when travelling by sea and inland waterway and amending Regulation (EC) No 2006/2004, Regulation (EU) No 181/2011 concerning the rights of passengers in bus and coach transport and amending Regulation (EC) No 2006/2004, Regulation (EU) 2021/782 on rail passengers' rights and obligations (recast). This legislation guarantees passengers with disabilities and reduced mobility the right to non-discrimination in access to transport and to receive assistance free of charge and, if necessary, adaptation of the transport services to their special needs in order to allow them to use the four transport modes as any other citizen. See: EU Passenger rights; The passenger rights regulatory framework including rights for persons with disabilities and reduced mobility in transport by air, water, bus and coach is currently under review.

[10] 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

[11] Elisabeth Kastenholz, 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.

[12] Flash Eurobarometer 499, Attitudes of Europeans towards tourism, Report, November 2021. Available at: link.

disabilities may also face difficulties in accessing services and preferential conditions for persons with disabilities provided by some service providers. While statistics are scarce, the findings on these challenges are based on solid evidence gathered, e.g. through desk research, consultation of public authorities and experts, online surveys, interviews, and multiple reports from academia and the European Parliament (See Annex 2).

2.1.Background (context)

Disability assessments in Member States

The concept of disability for all Member States as State Parties to the UNCRPD is based on the Article 1 of that Convention. There is no single EU definition of disability, nor any EU requirement for mutual recognition of disability status between Member States, except for a few limited cases included in Annex VII of Regulation 883/2004 on the coordination of social security systems.[13]

The Member States have full competence to define the eligibility criteria and the assessment procedures to recognise disability status, in accordance with their national provisions or laws. The disability assessment has a variety of policy functions such as assessments of work capacity, and assessments of needs for support (for 'long-term care') or even access to transport or parking cards (see Annex 6).

Estimating the number of persons with disabilities who are travelling

The number of persons with disabilities in the EU can only be **estimated** in the absence of systematic monitoring or statistical data. The information about persons with disabilities with a nationally recognised disability, who are in possession of the national disability cards or certificates, are available only from 14 Member States (BE, BG, HR, CY, DE, EE, ES, HU, IT, LV, LT, MT, PL and RO). By extrapolating EU-wide, it is estimated that the overall number of persons with a recognised disability and thus potentially eligible for all or some preferential conditions would be around 30 million in EU27. This is comparable to the number of persons with severe disabilities according to EU-SILC.[14] A subset of these persons travel to other Member States and can face barriers to have their disability status recognised.

Data on persons with disabilities participating in tourism and travelling are scarce. Estimates were done based on the 2012-13 data from the Study on travel patterns of persons with disabilities and on Eurostat data on the general population participating in tourism (i.e. travelling for at least one overnight stay in a domestic, foreign country or both) for personal reasons, including also travelling in relation to education or work such as the participation on seminars, trainings or meetings. Travelling for work related purposes, for example attending a meeting, is not explicitly excluded

[13] Regulation (EC) NO 883/2004 on the coordination of social security systems. Available at: link.

[14] The number of people with a recognised disability based on the 14 Member States is lower than the number of persons with disabilities mapped by the EU statistics. EU-SILC is collecting data on disability based on a question on "self-perceived" long-standing limitations in usual activities due to health problems for the age group 16+. EU-SILC contains two categories as concerns disability (=limitations): "some" and "severe".

from these estimates.[15] The year 2019 was used as a reference year in view of the disruptions to travel caused by the Covid pandemic in subsequent years.[16]

The rate of participation in tourism increased between 2012 and 2019. The trend for the general population in the EU is expected to be relevant also for persons with disabilities. By applying the 2012 gap in participation in tourism between the two groups to the 2019 data on the general population, **it is estimated that an upper bound range of 19.33m (i.e. 62.8%) persons with recognised disabilities aged 15-64 might have travelled abroad in 2019.**[17] Not all of them may have been effectively travelling or experiencing major obstacles in obtaining preferential conditions.

Table 1: Participation in tourism 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, between the general population and persons with disabilities, 2012	Share of persons aged 15-64 participating in tourism, 2019	Estimated number and share of persons with disabilities participating in tourism, 2019
EU 27	64.4%	58.1%	6.3	69.1%	19,334,354 62.8%

Note: Detailed table with per country information is provided in annex 6, Source: Study for the impact assessment based on Eurostat data and DG GROW's report on accessible tourism in Europe

Preferential conditions

Preferential conditions provided to persons with disabilities are offered mainly for the following services:[18] i) public and private transport; ii) parking; iii) culture; iv) leisure and sport; v) tourism and vi) amusement parks. The services may be with or without remuneration, and may be provided by private operators or public authorities. The most frequent type of preferential condition is monetary support (such as price reduction or free entries and memberships) and exemptions from an obligation such as paying for particular services (e.g. certain taxes, electricity or telecommunications services, membership fees). Other types of preferential conditions provided include: access to braille and audio guides, adapted guided visits (in sign language), specialised

[15] 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 European Commission (further "DG GROW Report"). Available at: link; Eurostat database. Available at: link.

[16] Study supporting the Impact assessment of an EU initiative introducing the European Disability Card, prepared by EY, Valdani, Vicari & Associati (VVA), Open Evidence and FBK-IRVAPP ("Study supporting the impact assessment")

[17] To obtain an estimate of the number of persons with disabilities travelling in 2019, the share was then multiplied by the number of persons reporting "severe" disabilities. The use of the "severe" disabilities data is justified by their resemblance with the number of persons with recognised disability status.

[18] Study supporting the impact assessment, see Annex 6 for more details; Classification of services can be found here: Complete list of all NACE Code (nacev2.com)

support within the recruitment sector, receiving priority service (i.e. the ability to skip queues or be served before other customers), reserved accessible parking areas, provision of wheelchairs and/or mobility scooters to be used on the premises etc.[19]

Preferential conditions are also offered when accessing services not for remuneration. Examples include: sign language interpretation when using public services; accessible seating in a public concert; loan of a wheelchair or other aid in natural parks; obtaining tourist information in accessible formats in a public information point; using a mobility scooter on roads or a wheelchair in bike lanes without a fine; assistance on the beach to enter the water, loan of a floating wheelchair; designated seats in parks and other public areas, etc.

Reasons why service providers decide to offer 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.[20]

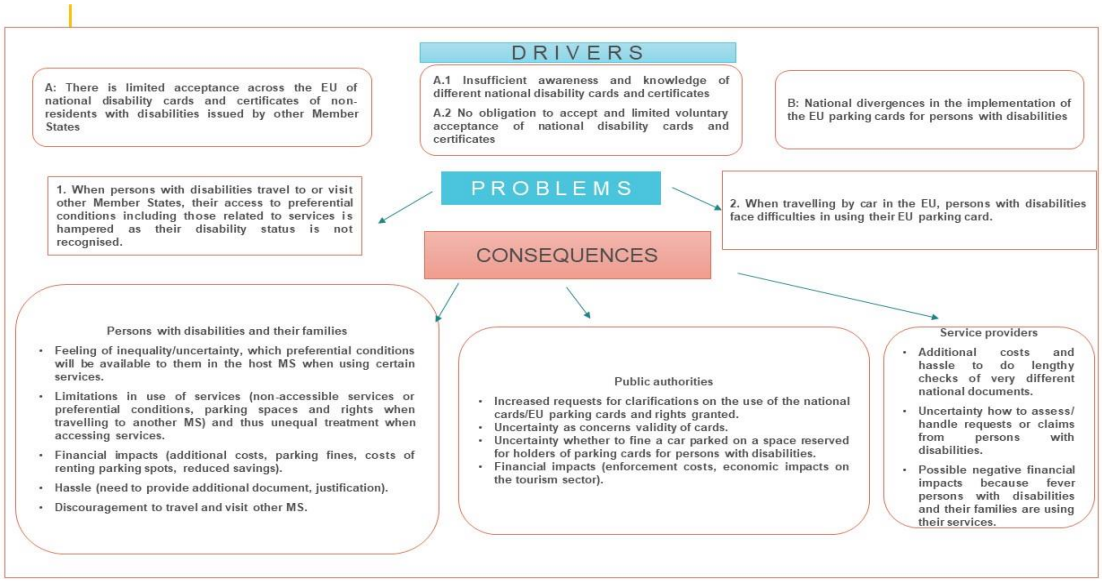
2.2. What are the problems?

The 'problem tree' below summarises the main problem at stake and the related drivers which this initiative tackles, with its underlying consequences for different stakeholders.

While, as described below, the initiative focuses on persons with disabilities travelling across Member States, it addresses two very specific problems, namely the difficulties encountered by persons with disabilities to use their parking cards and difficulties to get access to preferential conditions offered by service providers in other Member States due to the limited recognition of their respective parking and disability cards. It is acknowledged that persons with disabilities face also other barriers such as the limited, or even absence of, accessibility of the built environment and some services or the discriminatory treatment experienced when compared to persons without disabilities. However, it is not the intention of this initiative to tackle those problems, which are being addressed through other EU level initiatives, including specific accessibility legislation and standards and a specific proposal for equal treatment that is being discussed in the Council since 2008. Hence the specific focus of this initiative.

Figure 1: Intervention logic

[19] Ibid.
[20] Ibid.



2.2.1. When persons with disabilities travel to or visit other Member States, their access to preferential conditions including those related to services is hampered as their disability status is not recognised.

The disability status is determined by the assessment of disability of a person in a Member States and then proved by national disability cards and/or certificates, which are also necessary to access preferential conditions.[21] However, these national disability cards and/or certificates are often not recognised when persons with disabilities travel to or visit other Member States and would like to access preferential conditions. This difficulty was confirmed by many respondents to consultations done for this impact assessment (NCAs, CSOs, persons with disabilities). **Persons with disabilities** indicated that **they face challenges in proving their disability status and using their national disability cards for accessing benefits, getting assistance or accessing preferential conditions offered by services in the host Member State[22]. The number of persons with disabilities travelling and experiencing the problems may be small when compared to the total population travelling, yet for them these problems are very significant as shown in the answers to the public consultation by persons with disabilities (see Annex 2).** This initiative would help them to access preferential conditions on equal basis with the residents with disabilities of the visited country and to improve the predictability and legal certainty of that access.

The evidence collected indicates that more preferential conditions are available to residents with disabilities in comparison to non-residents with disabilities recognised in another Member State. For example, all Member States offer preferential conditions for public transport to residents with disabilities, while 14 of them were found to also extend such conditions to non-residents[23].

[21] See section 2.1. and Annex 6 for more details on national disability assessment.
[22] In the public consultation 349 persons with disabilities stated that their disability status is not recognised across Member States and 377 persons with disabilities specified that their disability card is not accepted when they travel across the EU. Specifically, limited provision of preferential conditions offered by certain services to non-residents was mentioned as a perceived obstacle by 762 respondents. Annex 6 provides some examples of difficulties encountered.
[23] See Annex 6. Some of those Member States participated in the pilot but decided not to include transport.

The consequences faced by persons with disabilities and their families are diverse. They may be **discouraged from travelling** to other Member States. This was highlighted by 980 respondents to the public consultation (individuals, civil society, public authorities, different organisations).[24] Persons with disabilities also face an **additional burden** as they are often requested to prove their disability status, e.g. by showing medical documentation as their national card is not recognised, in order to receive disability-related preferential conditions for using certain services abroad. This consequence was also identified by the EP study.[25]

High travelling expenses, due to their additional specific needs, are a key factor, which may discourage many persons with disabilities from travelling,[26] in comparison to persons without disabilities.[27] Such **additional costs** can be expenses to access and use services (e.g. adapted hotel rooms for persons using wheelchairs or requiring personal assistants) or caregivers' travel. Therefore, they highly value preferential conditions offered by the place of destination such as monetary support (price reduction or free access, including for personal assistants), exemptions (from paying for particular services), and other types of support (access to braille, audio guides, etc.).[28]

Given the precarious financial situation of persons with disabilities, it can be expected that financial concerns are important for their travel decisions.[29] 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, the latter being considered a reliable proxy for the share of the population with recognised disabilities.[30]

Consequences for public authorities are mostly additional information requests which constitute an additional administrative burden. Examples of requests for clarification were extracted from SOLVIT and are listed in Annex 6. These requests came from citizens of AT, SK, HU, DE, and ES. Citizens were asking if their national disability cards would be accepted in another Member State, to what preferential conditions they could have access, etc.[31] Another consequence is legal uncertainty as public authorities do not have means to confirm validity of cards in case of doubts about validity of a foreign card. There are as well economic impacts on the tourism sector with missed opportunities for travel by persons with disabilities as there will be less income for public authorities providing services such as is the case for transport.

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[24] Ibid.

[25] European Parliament, Priestly, M. (2022), Disability assessment, mutual recognition and the EU Disability Card. Available at: link.

[26] Alongside physical barriers in accessing both public and private spaces, e.g. transport, accommodations, attractions, cultural venues. Eugénia Lima Devile and Andreia Antunes Moura (2021), Travel by People With Physical Disabilities: Constraints and Influences in the Decision-Making Process.

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

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

[29] Financial reasons are a key argument for not travelling also among the general population. According to Eurostat, more than 60 million people did not participate in tourism "for financial reasons" in 2019. Eurostat database, tour_dem_npsex. Available at: link. 2019 was the latest available year for this information. The second main reason for not travelling were health reasons (32 465 994 people or 23.99% of the total population).

[30] Eurostat database, EU SILC 2021, HLTH_DPE010. Available at: link.

[31] Study supporting the impact assessment based on SOLVIT, see Annex 6 for details

Consequences for service providers are difficulties in recognising the diverse national disability cards and certificates to provide preferential conditions. Consulted service providers (12 out of 18) agreed that the European Disability Card would simplify the process of recognising the disability status of customers with a disability from other EU Member States.[32] There are also possible negative financial impacts because fewer persons with disabilities and their families are using their services.

2.2.2. When travelling by car in the EU, persons with disabilities face difficulties in using their EU parking card.

For many persons with disabilities, private car transport is the best or only possibility of getting around independently. The ability to park as close to their destination as possible and the availability of reserved parking facilities is key in supporting their autonomy and free movement. The EU parking card for persons with disabilities was created in 1998[33] and is one of the most visible and important achievements of EU disability policy. It is widely used by all the Member States. It contributed to the (implicit) mutual recognition of the disability status and facilitated the free movement of persons with disabilities in the EU. This was confirmed by a majority of respondents to the survey on the EU Parking Card (16/25 NCAs, 6/10 EU-level CSOs and 13/23 national CSOs). 75.4% (or 908) of respondents to the public consultation (on line standard questionnaire) agreed that the EU parking card facilitates the mobility of persons with disabilities.[34] The card is also known and used as confirmed by the majority of respondents to the public consultation (1877[35]). [36]

Despite its positive role, users are facing difficulties in the use of the EU parking card. From 2018 to 2022, around 260 enquiries about the EU parking card were submitted on the SOLVIT platform. Such complaints mainly regarded uncertainties as to the rights granted by the card to persons with disabilities when travelling to other Member States (around 30% of cases), mutual recognition of national parking cards, issued based on the EU model (around 25% of cases), as well as the justification for fines received even when showing the EU parking card (around 12% of cases).[37]

Problems in using the EU parking card and with its limited recognition were confirmed by the public consultation, specifically by 586 respondents with disabilities.[38] The Commission took stock of the state of play in 2019 and collected information from Member States.[39]

As a consequence, persons with disabilities have practical difficulties in exercising their freedom of movement. The use of the card is made more difficult due to the uncertainty about whether and how they can use it.[40] The non-recognition of the EU parking card results in practical

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[32] Study supporting the impact assessment based on Questionnaire on costs targeted at service providers
[33] Council Recommendation of 4 June 1998 on a parking card for persons with disabilities (98/376/EC), link.
[34] EDF recommendations for strengthening the EU Parking Card 2020. Available at: link.
[35] This figure includes response to the online standard questionnaire, the Easy to read questionnaire and Word questionnaire.
[36] Study supporting the impact assessment, see Annex 2.
[37] Study supporting the Impact assessment based on the SOLVIT platform, see annex 6 for more details
[38] Study supporting the impact assessment, see Annex 2.
[39] Do not take my spot! – The EU Disability Parking Card, organized by the European Parliament, link.
[40] Study supporting the impact assessment based on Survey targeted at PwDs; Survey targeted at NCAs; Survey targeted at other PAs; Survey targeted at EU-level CSOs; Survey targeted at national CSOs; Respondents to the online

disadvantages, such as not being able to park near the entrance of premises and may bring limitations in use of services and thus unequal treatment when accessing such services. Moreover, they can bear financial impacts. For example, 12% of SOLVIT complaints on this topic were about fines. Finally, due to the risk of non-recognition of the card in another Member State, persons with disabilities feel discouraged from travelling by car across the EU.[41]

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, the increasing divergences in the design of the EU parking card across the Member States have highlighted the need to provide parking controllers with ad-hoc training on the different types of cards in place.[42] There are also economic impacts on the tourism sector with missed opportunities for travel by persons with disabilities.

Consequences for **service providers** are additional costs and the burden of lengthy document checks, and uncertainty how to handle requests or claims from persons with disabilities.

2.3 What are the problem drivers?

2.3.1. Drivers for problem area A: There is limited acceptance across the EU of national disability cards and certificates of non-residents with disabilities issued by other Member States

Preferential conditions provided for persons with disabilities and their personal assistants are reasons for limited acceptance of national disability cards and certificates of persons with disabilities travelling or visiting other Member States.[43]

A.1 Insufficient awareness and knowledge of different national disability cards and certificates

Very different formats of national disability cards and certificates make it difficult for service providers to verify and recognise them.[44] Some national service providers consulted complained that they are not familiar with all disability cards or certificates and thus often do not accept them, especially when information is provided in foreign languages.[45]

The TFEU and the Directive on services in the internal market (2006/123/EC) prohibit discrimination on the basis of nationality. However, service providers are not aware and explicitly obliged to recognise the disability status certified in a different country of origin. This may lead to

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workshop with CSOs held on 22 March 2023 and to the online workshop with NCAs held on 23 March 2023; Evidence collected during case study interviews; Public Consultation - Respondents to the standard questionnaire.

[41] Study supporting the impact assessment based on Survey targeted at NCAs; Survey targeted at other public authorities; Survey targeted at EU-level CSOs; Survey targeted at national CSOs; Public Consultation.

[42] Study supporting the impact assessment based on Targeted interview with one EU Parking association.

[43] Study supporting the impact assessment based on Survey targeted at PwDs; Workshops with CSOs and NCAs held respectively on 22 and 23 March; Targeted interviews with one academic expert, one EU CSO and one EU body.

[44] Study supporting the impact assessment, 6 Member States have paper disability cards and certificates (AT, DE, EL, HU, RO, SK), 16 have plastic cards (BE, CY, CZ, DK, ES, FR, FI, HR, IT, IE, LU, LV, MT, PL, NL, SI), and 3 have a mixed format (EE, LT, PT).

[45] Study supporting the impact assessment based on the online workshop with service providers held on 11 May 2023.

discrimination on the basis of nationality in some cases, or at least to uncertainty as to whether service providers will recognise the disability status.

A.2 No obligation to accept and limited voluntary acceptance of national disability cards and certificates

There is limited willingness of national authorities and/or service providers to recognise a disability card / certificate issued by another Member State, which may apply, in their view, less strict disability assessment criteria and procedures than in their own Member State.[46]

Differences exist also in the amount and types of preferential conditions available to persons with disabilities across the Member States. They are mainly decided and offered on a voluntary basis by individual service providers. Only a few Member States have introduced a legislative framework establishing the type of benefits offered by services, as defined in the internal market *acquis* (and mainly provided for remuneration). The mandatory preferential conditions for resident persons with disabilities are found in only a few services, with most countries introducing them in public transport (23) and in parking (18). Differences also concern preferential conditions made available to personal assistants of persons with disabilities. A detailed mapping is presented in Annex 6.

2.3.2. Driver B: National divergences in the implementation of the EU parking cards for persons with disabilities

Council Recommendation 98/376/EC[47] (amended by Council Recommendation 2008/205/EC[48]) introduced the EU parking card model for people with disabilities. Despite being one of the most important achievements of the EU disability policy, the Recommendation did not fully succeed to achieve a truly EU-wide model card recognised among all Member States, especially due to its voluntary nature. Indeed, its Annex I provided only for minimum standards in terms of the design and layout of the EU parking card. It leaves it to Member States to adapt the card's layout and functional features to their own priorities and needs. It does not contain any provisions on coordination and monitoring by Member States. National authorities are free to establish the eligibility criteria for obtaining the card, the management system in place and the issuing authority, enforcement, any further elements to be added in the card layout. The model has not been updated since 1998 to reflect technological progress, especially to take into account the risk of fraud and forgery of the card, and did not include any security features. In order to better prevent fraud and forgeries, 12 Member States[49] have added their own security features (such as QR codes, holograms, barcodes). This increases differences in the card design. In response to the public consultation 45.6% (or 549 replies), 38.4% (or 462), 35.9% (or 432) claimed that differences in

[46] Disability assessment in Member States was analysed recently by two studies: Priestley, M., Disability assessment, mutual recognition and the EU Disability Card. Study Requested by the PETI Committee, European Parliament (2022), link; Waddington, L., Priestley, M & Sainsbury, R., Disability assessment in the European States, on behalf of the Academic network of European disability experts (ANED), with contributions from the ANED country experts, 2018, link.

[47] 98/376/EC: Council Recommendation of 4 June 1998 on a parking card for people with disabilities. Available at: link.

[48] 2008/205/EC: Council Recommendation of 3 March 2008 adapting Recommendation 98/376/EC. Available at: link.

[49] AT, BE, DK, ES, FI, IE, IT, MT, NL, PL, SE, SK. Annex 6 contains more information.

terms of design, the possible fraudulent use of the card and possible forgeries hinder the implementation of the EU parking card.[50]

The visual format contains the international disability symbol representing a wheelchair, which is easy to recognise, but the text displayed on the EU parking card is usually printed in the national language of the Member State, where the card is issued. This further adds to the difficulties for local authorities or service providers of other Member States to understand the text written on the card and thus its purpose.[51] A further element of complexity is the coexistence of older and newer models of cards. Since 2017, in France the EU parking card is progressively being replaced by a new non-EU model parking card, i.e. the CMI ('Carte mobilité inclusion'), yet both of these quite different models are currently valid and in use. This has resulted in increasing national differences in: (i) the card's layout, (ii) the parking rights granted to cardholders, and (iii) the control and enforcement of the parking card. Such differences sometimes even occur within a single Member State, when the card is issued at the regional or local level.[52]

It has been found that there is a lack of information on the conditions granted to cardholders across municipalities and across the Member States. This again creates uncertainty for cardholders and discourages them from travelling. Indeed, they often do not know what concessions are granted, which may result in fines. Member States also have different approaches to control the validity and the proper use of the EU parking card. In addition, parking and traffic control methods are increasingly digitised and focused on automated checks on the car plate, rather than on manual checks on the paper-based EU parking card. In cities where automatic checks are performed, parking cardholders have to register their parking card to their car plate on a local platform (e.g. in Brussels or Milan). This means that it is necessary to register in a different local platform when visiting different cities, creating significant uncertainty for cardholders on the rules. They are often required 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.[53]

2.4. How likely is the problem to persist?

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.

Free movement and access to services are also affected by matters of accessibility. There are comprehensive rules on accessibility of trains and railway stations in Commission Regulation 1300/2014. Some (but not all) maritime ships have to be accessible according to Directive 2009/45/EC. Certain (but not all) buses must also be accessible according to Regulation 661/2009. There are, however, no EU level accessibility rules on air transport. The incomplete coverage of the

[50] Study supporting the impact assessment, more details are in Annex 2.
[51] European Parliament (2022), Priestley, M., Disability assessment, mutual recognition and the EU Disability Card - Progress and opportunities. Available at: link.
[52] Do not take my spot! – The EU Disability Parking Card. Available at: link; Final Report based on Survey targeted at national CSOs.
[53] Study supporting the impact assessment.

legislative framework is among the reasons why some persons with disabilities have to rely on private cars, rather than public transport. This underlines the importance of the EU parking card.

The positive role of the parking card 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. The number of Member States using automatic number-plate recognition automatic cameras is likely to further increase. The paper-based format of the EU parking card is not adequate for such innovations. More Member States would likely add security features to prevent fraud.

The problem is also expected to further grow in magnitude given the ageing of the EU population[54] and higher prevalence of disability in the age category above 65 years.[55] Older people with disabilities (usually aged 65+) can benefit across the EU from preferential conditions (discounts or reduced fees) granted based on age without needing any EU disability card. However, they usually cannot benefit in other Member States from preferential conditions for persons with disabilities, such as personalised services and assistance, priority service, etc.

Travelling patterns of the general population in the future can be expected to continue a linear increase, as was the trend until 2019 before the Covid pandemic.[56] To estimate future trends in participation in tourism of persons with disabilities and how the gap between persons with disabilities and the general population will develop, data on trends in participation in tourism of the general population aged 15 to 64, and survey data on persons with disabilities in the same age group were combined to simulate future scenarios. The basic scenario assumes that the gap remains constant. The increasing gap scenario is the most pessimistic and assumes that the participation in tourism of persons with disabilities does not grow in parallel with that of the general population. Two more optimistic scenarios assume that the travel gap would slightly decrease. In the minimum improvement scenario, the share of persons aged 15-64 travelling by 2030 is estimated at 70% for persons with disabilities and 75% for the general population. In the most optimistic scenario, the share for both groups would be 75 % but that is considered to require a significant improvement in accessibility of destinations for persons with disabilities.[57]

These last two scenarios are encouraging as a stronger reduction of the travel gap would not happen without major policy interventions aimed at improving physical and virtual accessibility and the financial affordability for persons with disabilities. The recognition of the disability cards of people travelling for the purposes of accessing services under the same preferential conditions as persons with disabilities residing in the country they are visiting is the third element and the aim of this initiative. Indeed, as uncertainty continues as concerns recognition of the disability and parking

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[54] There has been an increase in the total EU population aged 65+ (from 81 million in 2013 to 94 million in 2022), Eurostat, Available at: link, and this is predicted to continue in the future from 21.1% of the total population in 2022 to 31.3 % of the total population by 2100, Eurostat: Available at: link

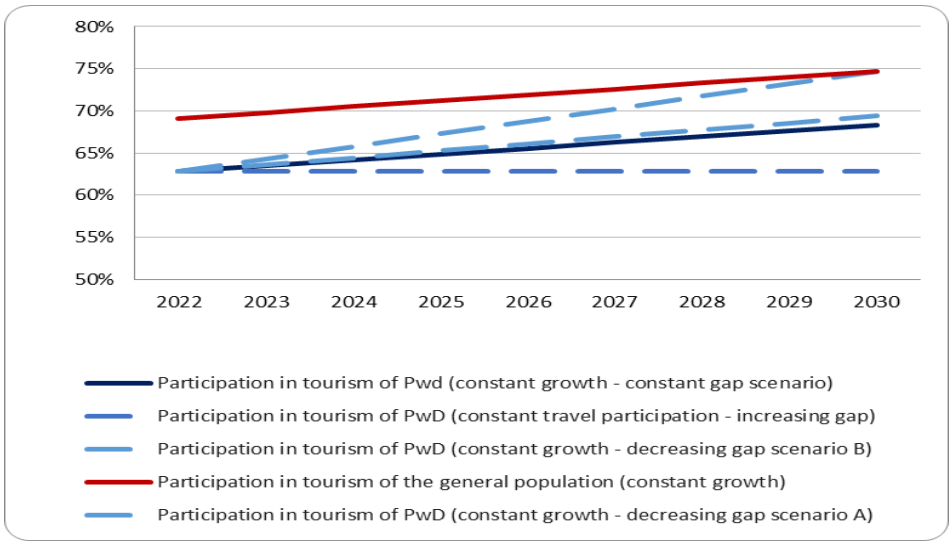
[55] Eurostat database, hlth_silc_12. Available at: link.

[56] Several projections of future trends in participation in tourism were made for the general population and the population of persons with disabilities for 2022-2030, based on past trends in travel propensity of the population aged 15 to 64 (Eurostat database, TOUR_DEM_TOTOT. Available at: link) and survey data on persons with disabilities in the same age group (DG GROW Report). .

[57] They build on DG GROW's study on accessible tourism, where respondents were asked about their travel propensity under scenarios of "minimum" and "moderate" improvements in accessibility. The former would minimally reduce the gap, while the latter would remove the gap.

cards to access preferential conditions, the most likely scenario would be that the estimated gap between the travel participation of persons with disabilities and the general population remains unchanged. The scenarios are further analysed in section 6 on impact of the options.

Figure 2: Scenarios of future changes in participation in tourism for general population and persons with disabilities (age group 15-64)[58]



Source: Study supporting the impact assessment

This assumption is also supported by stakeholders' feedback, in particular from persons with disabilities replying to the public consultation. Respondents replied positively[59]

- On the importance of the EU action to facilitate mutual recognition of disability in the EU: 936 EU citizens, 62 NGOs, 23 public authorities, 16 companies/businesses/business associations, 21 academia/research institutions, 20 non-EU citizens and 4 trade unions, and 695 persons with disabilities across all categories.
- On the need to facilitate access to those services offering preferential conditions to persons with disabilities: 925 EU citizens, 61 NGOs, 20 public authorities, 14 companies/business associations, 20 academia/research institutions, 20 non-EU citizens and 4 trade unions, and 690 persons with disabilities across all categories.
- And on the need to improve the implementation of the EU Parking card for persons with disabilities: 836 EU citizens, 56 NGOs, 24 public authorities, 15 companies/businesses/business associations, 19 academia/research institutions, 18 non-EU citizens and 4 trade unions, and 631 persons with disabilities across all categories.

[58] The age group is 15-64 is the one used in the DG GROW Report. In addition, using this age group addresses the issue that there are other preferential conditions for the elderly, irrespective of disability.
[59] Study supporting the impact assessment, Annex 2.

3. WHY SHOULD THE EU ACT?

3.1. Legal basis

This legislative initiative falls under EU shared competence. It will fully respect the subsidiarity principle and national powers as it will not affect the mechanisms in place at national level, granting the disability status based on national assessments (including issuance of national cards/certificates), nor lead to any harmonisation of disability assessment status or disability definition at EU level.

The Treaties provide for a **multiple legal base** to meet the objectives of the initiative:

- The starting point of the present initiative is to **facilitate the free movement** of persons with disabilities as Union citizens. Its purpose is to ensure that when exercising their right of free movement, this group of EU citizens is not discriminated on the ground of nationality or face disadvantages because they do not hold a disability card or certificate issued by the host Member State (in comparison with persons with a disability recognised in that country). A European Disability card, and / or the European Parking Card for persons with disabilities recognised in all Member States, will provide legal certainty with respect to the access to preferential condition offered by services in other Member States.

- The EDC will allow cardholders when travelling to **benefit from preferential conditions when accessing services,** whether with or without remuneration, on an equal basis with persons with a disability in the visited Member State. **Articles 53/62** TFEU concern services provided in the internal market.

- With respect to special conditions and preferential treatment to access services in the field of transport, including parking facilities, **Article 91** TFEU applies. In addition, this Article is also relevant since it allowed for the adoption of the 1998 Council Recommendation creating the existing EU parking card voluntary scheme, which will be replaced by the current initiative.[60]

- If and to the extent that the initiative would cover services falling outside the scope of the above-mentioned legal bases, **Article 21** TFEU, establishing the right to free movement of persons, could be added to cover residual services. Article 21 TFEU 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*".[61]

3.2. Subsidiarity: Necessity and added value of EU action

This proposal fully respects the principle of subsidiarity. The different, interlinked objectives of this proposal cannot be sufficiently achieved by the Member States independently but can rather, by reason of the scale and effects of the action, be better achieved at EU level. Action at EU level is

[60] 98/376/EC, the Council Recommendation was based on Article 75 TEC, now Article 95(1) TFEU.

[61] Article 21(2) TFEU applies only if an action by the Union should prove necessary to attaint this objective and the Treaties have not provided the necessary powers. Depending on the precise scope of the initiative, Article 21(2) TFEU may be used to cover its parts that would not be ancilliary and would not fall under the legal basis mentioned above.

thus necessary.The problem identified has a cross border dimension that cannot be solved by the Member States on their own. Since the introduction of the EU parking card in 1998, the Member States have not undertaken initiatives to improve the convergence of their models. While the EU Disability Card pilot project worked among the 8 participating Member States, it lacked the EU-wide dimension, creating significant uncertainty and unequal treatment of persons with disabilities travelling and visiting different Member States. As the pilot project card and its model are voluntary, the same problems of divergence as with the parking card would likely develop over time.

The necessity of EU action is directly linked to the cross-border nature of travel and related challenges faced by persons with disabilities travelling in the EU, thus the need to ensure an adequate coordinated approach among Member States in facilitating access to preferential conditions offered by services on an equal basis to residents in their country. Lack of action at EU level would likely result in Member States adopting different systems, resulting in continued difficulties with the recognition of disability cards and certificates, as well as of the EU parking card, across borders. Should the EU not intervene, current differences in national disability cards and certificates would likely also increase, and the different treatment of persons with disabilities across the Member States would remain or increase further, with adverse effects on the exercise of their free movement rights and their access to special conditions or preferential treatment in relation to services.

EU action adds value by introducing a mutually recognised instrument (the European Disability Card), facilitating the free of movement for persons with disabilities in the EU and their equal treatment when accessing services compared to residents with disabilities across Member States. The evaluation study on the pilot EU Disability Card showed that in the eight Member States participating in the project, the EU action has enabled mutual recognition of disability status for the purposes of accessing services across Member States that would not have been achieved by Member States acting alone.[62] In this light, the intervention of the European Commission contributed to the implementation of the European Disability Strategy 2010-2020.[63] Experiences from the pilot project and the Council recommendation show that an EU legal instrument, in this case a Directive, is necessary to ensure full implementation of the initiative, adopting the common EU-model and facilitating the access of persons with disabilities to preferential conditions.

4. OBJECTIVES: WHAT IS TO BE ACHIEVED?

General objective of the European Disability Card initiative

To facilitate free movement and equal access to services for persons with disabilities in the EU.

The European Disability Card initiative intends to facilitate free movement and equal access to services of persons with disabilities in the EU. It will facilitate the recognition of the disability status for the purposes of accessing services across Member States. When accessing services

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[62] 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.

[63] *European Disability Strategy 2010-2020: A Renewed Commitment to a Barrier-Free Europe*, /* COM/2010/0636 final */, available at: link.

covered by its scope, European Disability Card holders would benefit from the same preferential conditions provided to persons with disabilities in the host Member State. The aim is to remove difference in treatment between residents and visitors with disabilities. This would in turn lead to greater equality and legal certainty. It should be acknowledged that, due to differences in national disability assessments and consequently in the levels of disability recognised in different Member States, the initiative cannot address the issues like the access to some specific benefits that are reserved for persons with specific levels of disability in individual Member States which are provided in accordance with their national/regional/local rules, procedures and pracitces. The scope of this initiative is those persons with disabilities who have a recognised disability status in their own Member State and are holders of the European Disability Card and are entitled to recognition and rights abroad. The EU does not have competence as regards harmonising the disability assessment, therefore options in this area are not considered. Furthermore, as mentioned before, other specific EU initiatives address the issue of accessibility.

In addition, the initiative intends to improve the functioning of the EU parking card for people with disabilities, improving its mutual recognition, preventing forgery and fraud.

The initiative would decrease the uncertainties faced by persons with disabilities as to the recognition of their disability cards or certificates, and/or EU parking cards and related access to preferential conditions. These uncertainties and difficulties caused by non-recognition of disability status and/or EU parking cards are having negative impacts on people's will to travel and visit other countries. The final goal of the initiative is therefore, increased mobility of persons with disabilities.

Several scenarios of increasing participation in tourism are possible as described in section 2.4. It must be clear that the initiative is not intended to solve all the problems that persons with disabilities face when travelling but instead is focused on promoting non discriminatory treatment between persons with disabilities visiting a country and residents with disabilities when accessing preferential conditions offered by service providers. The access to preferential conditions will compensate to some extent the financial situation of persons with disabilities travelling. However, it is also not in the scope of the EDC to address financial affordability of travel. Moreover, as already mentioned, the initiative does not address the accessibility of built or virtual environments, which is addressed by other EU legislation (i.e. the European Accessibility Act namely Directive 2019/882 and related standards) and financial support via the EU funds (i.e. shared management funds Regulation (EU) 2021/1060 requires accessibility). These factors are outside the scope of the initiative. Therefore, the initiative is not aiming to fully close the disability travel gap. Estimated modest contributions of individual options to decreasing the travel gap and the value added to the market for accessible tourism are described further in section 6.

The European Disability Card will not replace national disability cards. Its scope will not cover benefits in the area of social security / social protection (i.e. (non-)contributory cash benefits or benefits in kind), access to which is governed by national rules and, in a cross-border context, by Regulations (EC) No 883/2004[64] and No 987/2009[65] on the coordination of social security systems.

[64] Consolidated text: Regulation (EC) No 883/2004 of the European Parliament and of the Council of 29 April 2004 on the coordination of social security systems (Text with relevance for the EEA and for Switzerland) Text with EEA relevance. Available at: link.

Specific objectives

1. ***To facilitate mutual recognition of disability status when persons with disabilities travel to or visit other Member States.***
2. ***To facilitate use and legal certainty in the use of the EU parking card for persons with disabilities.***

Both objectives intend to tackle the problem of non-recognition of national disability cards or certificates and difficulties in the use of the EU parking card. The objective is it to provide for the tools/instrument that would allow persons with disabilities to benefit from the same preferential conditions provided to them in the host Member State and under the same conditions (for example in some cases being a resident is a condition to get access to benefits and this condition will remain as it applies to persons with disabilities also in the host Member State). The instrument must be secure and in line with current digitalisation developments.

The specific objectives are consistent with the EU Treaties and other EU policies. They will contribute to the implementation of the European Pillar of Social Rights and the Strategy for the Rights of Persons with Disabilities 2021-2030.

5. WHAT ARE THE AVAILABLE POLICY OPTIONS?

In order to address the challenges identified in the problem assessment in Chapter 2, different options have been considered.

- The baseline scenario
- Policy area A: options aimed at facilitating mutual recognition of disability status in the EU in relation to access to services when visiting another Member State
- Policy area B: options aimed at facilitating mutual recognition of EU parking cards for persons with disabilities, issued based on the EU model
- Discarded options

5.1. What is the baseline from which options are assessed?

The baseline scenario means no major policy action and leaving in place two current Cards: the EU parking card for people with disabilities based on the 1998 Council recommendation and the EU Disability Card adopted in eight Member States on a voluntary basis. The EU Disability Card system would remain, with voluntary inclusion of the areas of culture, leisure, sports and transport, and service providers are expected to continue to offer preferential conditions for persons with disabilities.

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. Over time these

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[65] Regulation (EC) No 987/2009 of the European Parliament and of the Council of 16 September 2009 laying down the procedure for implementing Regulation (EC) No 883/2004 on the coordination of social security systems (Text with relevance for the EEA and for Switzerland). Available at: link.

differences would further increase due to technical and digital developments that are impacting on parking control, and prevention of fraud and forgery (inclusion of additional security features).

5.2. Description of the policy options

5.2.1. Policy area A: Options aimed at facilitating mutual recognition of disability status in the EU in relation to access to services when visiting another Member State

The proposed options consider introducing a model European Disability Card (EDC), building on the pilot. It also builds on other comparable instruments providing for an EU model format already in place: amongst others, the **European Health Insurance Card**, the **Community model for national driving licences**[66] and the **European Student Card**. Uniformisation or standardisation of security standards, formats and specifications have been pursued in the area of travel and residence documents (e.g. for identity cards and passports issued to EU citizens or residence cards, residence permits and visas issued to third-country nationals).[67]

The European Disability Card will not replace national disability cards or certificates, Member States remain free to continue issuing national cards as well should they choose to do so.

- **Mandatory EDC model in all Member States for travelling and/or visiting purposes – selected sectors (Policy option A1)**

The initiative would propose **minimum common rules** for the model EDC and conditions for its issuing/applications:

Format: The EDC shall have an EU common model both in digital and physical format. It should include some minimum **security features such as:** 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 such as Braille printing.

Eligibility: Persons eligible to receive the EDC shall include EU citizens with recognised disability status granted by the Member States of residence and based on this country's own assessment criteria and procedures, including validity/expiration. The EDC would not replace the national disability cards and certificates.

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[66] In addition, in March 2023, the European Commission proposed updated requirements for driving licences and better cross-border enforcement of road traffic rules. The aim is to modernise driving licence rules, including the introduction of a digital driving licence valid throughout the EU which should help simplify the recognition of driving licences between Member States.

[67] Council Regulation (EC) No 1030/2002 laying down a uniform format for residence permits for third-country nationals; Regulation (EU) 2019/1157 on strengthening the security of identity cards of Union citizens and of residence documents issued to Union citizens and their family members exercising their right of free movemen; Council Regulation (EC) No 1683/95 laying down a uniform format for visas; Regulation (EU) 2019/1157 on strengthening the security of identity cards of Union citizens and of residence documents issued to Union citizens and their family members exercising their right of free movement; Council Regulation of 13 December 2004 on standards for security features and biometrics in passports and travel documents issued by Member States.

Scope: The EDC shall apply to the culture, leisure, sport and transport[68] sectors following the positive results of the pilot project and recommendations to include all the sectors to ensure bigger impact as transport was included only in two pilot countries. Moreover, the EDC shall also provide that preferential conditions offered to personal assistants[69] 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.

- **Mandatory EDC model in all Member States for travelling and/or visiting purposes – all service sectors (Policy option A2)**

The initiative would propose **minimum common rules** for the model EDC and conditions for its issuing/applications. It would have the **same provisions on format and eligibility as policy option A1,** with the main difference in the scope of the initiative.

Scope: The EDC shall apply to all services with or without remuneration, provided by private operators or public authorities, including passenger transport services, including the sectors of Policy Option A1. 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.

- **Accompanying measures applicable to policy options A1 and A2**

The Member States shall establish a national accessible website[70] providing as a minimum information on: (i) who is eligible for the EDC; (ii) how to obtain the EDC; (iii) preferential conditions available (those set by legislation) to persons with disabilities in the Member States. The national website should also include a Frequently Asked Questions (FAQ) section, as well as a section where cardholders can submit questions or complaints on the use of the EDC. The national websites shall be accessible for persons with disabilities following EU level accessibility standards and contain easy-to-read information. Hyperlinks to the national websites shall be included in the Your Europe Portal. The national websites shall be available as a minimum in the national language(s) of the concerned Member State and in English, and shall be readable by translation tools.

The Your Europe Portal[71] will include 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 all Member States.

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[68] Transport is the key sector for persons with disabilities and their independent mobility. Indeed, the vast majority of respondents to the public consultation believes that it is the most important sector to be included: 94.7% of respondents to standards questionnaire and 94% to easy-to-read questionnaire, which is together 3077.

[69] Personal assistants are often formally recognised in the Member States where they are legislated.

[70] In line with requirements of Web Accessibility Directive (Directive (EU) 2016/2102) and Accessibility Standard EN 301 549 v 3.2.1

[71] 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

An EU-wide awareness-raising campaign will inform all stakeholders (persons with disabilities and their personal assistants, accompanying persons (such as family and friends), service providers, national authorities, general public, etc.) about the EDC using advertisements and also social media.

5.2.2. Policy area B: Options aimed at facilitating use and legal certainty in the use of the EU parking card for persons with disabilities

- **Option B1: Enhanced/reinforced voluntary EU parking card**

The EU parking card would remain voluntary. To improve its effectiveness, **Annex I to** the Recommendation would be amended so that the EU model parking card is complemented with security features to prevent its fraud and forgery (e.g. QR code, hologram, barcode) and avoid paper versions. The Commission will support coordination between Member States by issuing **EU common guidelines concerning the establishment of national databases of cardholders** that are accessible to responsible authorities in charge of controlling the use of the parking card at the national level. These guidelines would focus on publicly available information accessible for persons with disabilities (e.g. on an accessible 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.

- **Option B2: Mandatory EU parking card model**

The EU parking card would become mandatory. A legislative act will be introduced repealing the current Council recommendation. As in Option B1, the model shall include minimum common rules on specific security features to prevent its fraud and forgery, digital features such as QR code, hologram, barcode, etc. The model introduced with the legislative act will replace existing cards, issued on the basis of the Recommendation. The Member States shall retain the power to establish the eligibility criteria to receive the card as well as to determine the parking rights provided for the card at the national level. Thus the principle of subsidiarity will be respected.

Member States shall establish national databases including, as a 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.

- **Accompanying measure for policy options B1 and B2**

The EU portal **Your Europe** that provides information on how to get and use the current parking cards that follow the EU parking card model recommendation would provide links to the national or local websites which provide information on the rights associated with the parking cards.

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the second sub-section provides information on the use of the EU parking card for person with disabilities. Your Europe Portal available at: link.

5.2.3. Common accompanying measure for policy options A1, A2, B2

The Commission will create **a committee** within the meaning of Regulation (EU) No 182/2011.[72] The committee will assist the Commission. It will be chaired by a representative of the Commission and composed of representatives of the Member States.

5.2.4. Options discarded at an early stage

The design of options and the decision to discard certain options is strongly based on experience of the EDC pilot project, and on the experience of 98/376/EC Council Recommendation of 4 June 1998 on a parking card for people with disabilities. The political feasibility of options and their relevance also played an important role as well as the views of stakeholders.

The EDC pilot tested a purely voluntary approach, both as concerns the card design and the decision of service providers to participate. The Commission widely promoted the pilot, both to Member States and to stakeholders. The pilot was a success within the constraints of its design, which brought several limitations, such as only partial coverage of certain services within the selected sectors and of service providers. This required a central database to be created, updated and communicated to people with disabilities, who still lacked certainty as to the recognition of their status, as it was difficult to keep the database updated and the decision on the recognition of the disability Card remained voluntary. The options retained for detailed analysis in the IA report overcome these constraints, by ensuring predictability for persons with disabilities, legal certainty for all parties, and equality of treatment between residents and non-residents with disabilities.

Experience of the pilot underpins the decision to discard, for example, the introduction of the EDC on a voluntary basis, as it would bring additional deviations in the standard (physical and/or digital) format of the Card over time (as happened with the Parking card) and associated difficulties for its recognition and use. If only few Member States adopt the card voluntarily, they can suffer from first mover disadvantage. They bear the costs of issuing the card, while it can be used only in a limited way. The full potential benefits for persons with disabilities can only be achieved if all Member States participate at the same time. The value added of a mandatory approach is that all Member States simultaneously issue and accept the EDC from other Member States.

Experience of the pilot also highlighted the limits of service providers voluntarily offering their preferential conditions to persons with disabilities from other Member States, which resulted in a limited number of participating services, high uncertainty for persons with disabilities, and relatively high administrative efforts for Member States to keep information updated.

Options which did not address the core issue of equal treatment of persons with disabilities, regardless of where their disability is assessed, were not pursued (relevance of the options). While the decision by a service provider to grant preferential conditions to persons with disabilities remains voluntary (unless set by national law), once granted, the same preferential conditions should be available for all EDC holders.

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[72] Regulation (EU) No 182/2011 of the European Parliament and of the Council of 16 February 2011 laying down the rules and general principles concerning mechanisms for control by Member States of the Commission's exercise of implementing powers. Available at: link.

Options that would fail to gather the necessary political support for legislative adoption were discarded. While the EP resolution calls for a single EU disability definition, this would fall outside EU competence. When measured against proportionality, any attempt to introduce such a definition would need to go beyond only travel purposes, to include for example social security, a field in which it proves difficult to achieve EU level harmonisation.

All options involving an obviously too heavy administrative burden were not pursued. For example, the pilot approach of the EDC involved "selected services," negotiated with each provider and updated in databases accessible to visitors from other Member States.

The use of an EU-wide database of documents, presenting the design and security features of various national cards, was discarded, given the very high number of service providers across the EU whose staff would need to be trained in its use to understand cards or paper certificates from across the EU (moreover, not all Member States issue cards or certificates). Service providers would still have the discretion to extend or not preferential conditions to non-residents, meaning continued practical and legal uncertainty for persons with disabilities on recognition of their cards / certificates.

A. Discarded options related to Policy area A (Policy options aimed at facilitating mutual recognition of disability status in the EU)

To introduce an EDC that applies to a list of selected internal market services[73] identified as priority services

The effectiveness of this option would largely depend on the establishment of a monitoring system to track services participating in the initiative as well as to inform persons with disabilities about participating services and the preferential conditions. It would require the creation and updating of a website with all detailed information. However, such a system is not expected to be cost-effective as it would entail a disproportionate burden resulting from the regular monitoring of concerned services and the establishment of a comprehensive database, including information on preferential conditions available to persons with disabilities.

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

The success of this option would largely depend on the willingness of individual Member State to implement it. Only if all Member States adopt the voluntary EDC would its mutual recognition while travelling or visiting be ensured. However, based on the experience of the pilot EDC, only a few Member States voluntarily decided to adopt the EDC. Even with additional EU coordination and supporting mechanisms, it is unlikely that more Member States would adopt it.

To create an EU-wide database outlining the design and security features of the various national cards

[73] This option differs from policy option A1 as one refers to the "services" and the other to the "sectors".

Such a database was established for passports[74]. The database would improve knowledge of different formats of the national disability cards and certificates and the EU parking cards issued by different countries. However, it would not solve the key problem, which is mutual recognition and willingness to offer the same benefits and preferential conditions available to residents of a Member State to residents of other Member States. To ensure mutual recognition of the disability status and access to preferential conditions, including the parking rights, the legislative instrument is deemed to be necessary also based on experience with the pilot project and the implementation of the Recommendation. In addition, managing the database would bring administrative burden.

To replace national disability cards by the EDC

The option to replace national disability cards by the EDC was discarded. Persons with disabilities who are holders of national cards and have no intention to travel abroad should be able to continue to use their cards. Introducing the obligation to replace all national cards would introduce an unnecessarily large administrative burden. It is not fit for purpose, as the objective of this initiative focuses on persons with disabilities who are travelling to and/or visiting other Member States. At the same time, Member States would be free to decide whether to progressively replace national cards with the EDC.

B. Discarded option related to Policy Area B (Policy options aimed at facilitating use and legal certainty in the use of the EU parking card for persons with disabilities)

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

Discarded due to lack of proportionality and legal base for harmonisation, as this option goes beyond what is necessary to achieve SO1 (i.e. ensuring mutual recognition of disability cards when persons with disabilities travel in the EU). 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 in Member States at national, regional or local level.

C. Common discarded options for the Policy area A and B

To establish a system of mutual recognition of disability status either by a common definition of disability and or common assessment criteria and procedures

Discarded due to lack of proportionality and legal competence to harmonise, as this option goes beyond what is necessary to achieve SO1. Moreover, since the assessment of disability status is undertaken at the national, regional or even local level according to assessment criteria and related procedures enshrined in national legislation, this option could also raise concerns in terms of political feasibility and impact on social security benefits and taxation.

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 and use, hence they should be kept as two distinct cards. Also, stakeholders

[74] https://www.consilium.europa.eu/prado/en/prado-start-page.html

consulted pointed out that merging the two cards would limit the possibility of persons with disabilities to use both cards simultaneously. The Member States have also underlined that the eligibility for the two cards differs at national level

5.2.5. Stakeholders' views on policy options

The European Parliament in its 2022 Resolution strongly believes that the European Disability Card should be based on a binding EU legislative act that should cover a range of different areas beyond culture, leisure and sport. It especially stresses that the Card should also, by default, be usable for services provided at national, regional and local level, such as transport, have a dedicated EU website and accessible online database available in all EU languages, including specific communication formats, like easy-to-read language, Braille and sign language. It underlines that persons with disabilities and their representative organisations have to be closely involved in the implementation of and communication on the Card.

The call for evidence consultation showed that out of the 272 respondents the following were in favour of an EDC that **(i)** is mutually recognised across the EU (97 EU Citizens, 20 CSOs, 1 SME, 1 Other) – options A1 and A2; and **(ii)** 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) – option A2. Some targeted interviews (expert, 1 CSO, 1 EU body) showed less support for applying the card to all services (option A2).

In the public consultation most respondents expressed the view that the EDC should be binding for all Member States, without the possibility of opting out**:** 867 of 999 EU citizens, 56 of 66 NGOs, 23 of 29 public authorities, 18 of 25 companies/business associations, 20 of 23 academia/research institutions, 17 non-EU citizens, 3 consumer organisations, and 661 of 757 Persons with disabilities across all categories (options A1 and A2). More than 80% of the respondents agreed that EU action is needed to improve the implementation of the EU Parking card for persons with disabilities (options B1 and B2).[75]

As concerns Member States' views, all 7 Member States that sent position papers or the 16 Member States that spoke in the Social Protection Committee meeting of 3 April 2023 agreed on the existence of the problem, the need for EU action and the binding character of the initiative as the appropriate means to tackle it. There is also consensus among users and Member States that the EDC and the EU Parking Card should be kept as separate cards and that both physical and digital cards should be available to card holders. No other Member States expressed a different view on those matters.

On 18 October 2022, the Commission adopted its 2023 Work programme and announced in its Annex the adoption of the European Disability Card for 2023 as a legislative initiative with its related impact assessment.

In the following discussions with Member States, the legislative nature of the initiative was stressed by the Commisison in its presentations while seeking feedback from stakeholders. The reflection on the initiative has been included in each 2022 and 2023 meeting of the Disability Platform, composed of representatives of Member States (UNCRPD focal points from all Member States) and

[75] A synopsis report of the consultations is available in Annex 2.

civil society, and has been further developed through discussion in a dedicated Sub-group of the Platform. In addition, the Commission discussed the initiative with Member States in the Social Protection Committee meeting of 3 April 2023 and further during the meeting on the European Disability Card organised by Finland on 17 May 2023 to support the Commission's preparations. The meeting conclusions made by Finland reflected well the positive reception of the EDC by Member States and highlighted that the EDC initiative is warmly welcomed. Recommendations include careful planning of the extension of the services covered, no merger of the parking card for persons with disabilities with the EDC into a single card, and no coverage of social security and healthcare benefits. Seven Member States and one region have so far submitted a position paper (Denmark, Finland, France, Hungary, Italy, Poland, Sweden and Bavaria), all of them supportive and none of them expressing critical views of the - at the time forthcoming - legislative initiative.

Where Member States were critical and clearly opposed was the harmonisation of disability assessment, giving as the key reason the national competences that in their view they have. Member States were also against including in the initiative measures which would oblige service providers to grant preferential conditions to persons with disabilities. They were supportive of the initiative as described in the Commission Work programme, namely "*proposing a European disability card ensuring the mutual recognition of disability status across all Member States*". The Commission was also clear in its presentations that there was no intention to extend that mutual recognition to cover the area of social security, and this was welcomed by Member States given that social security coordination is already regulated at EU level. In that context, at least three Member States expressed concerns about the different levels of disabilities recognised in some Member States.

Similarly, there is also consensus among other stakeholders, particularly persons with disabilities and also EP and EESC, on the need for the EDC and on it being proposed in legislative form.

The scope of the EDC (i.e. which services are covered) encounters more diverse views. Persons with disabilities favour the widest possible scope, as do the EP and the EESC, while Member States' opinions are more varied. Six Member States expressed their preference to cover those services from the pilot, while two others showed openness to extending and one region expressed concerns about including transports. Organisations representing persons with disabilities would like a wide scope that would be extended to accessing social security benefits while they await disability assessment in a new host country. This view is also supported by the EESC. There is strong consensus among Member States (at least 19 of them were explicit about it) and also civil society that the European parking card should not be merged with the new EDC. One measure of concrete success of the EDC pilot, showing the support of those Member States that participated, is illustrated by the high number of cards issued by the participating countries at their own initiative and costs *after* the end of the pilot funding, as shown in the table below:

Table 2: The number of EU Disability Cards

	Nº Cards issued* during Pilot	**Cards issued during Pilot as % coverage of persons with disabilities**	**Nº cards issued until now (i.e. incl after Pilot)**	**Cards issued until now (i.e. incl after Pilot) as % coverage of persons with disabilities**
BE	66,141	11.07%	154,655	25.89%

CY	2,110	14.07%	5,123	34.15%
FI	5,157	1.71%	24,965	8.32%
MT	8,157	31.77%	25,669	100%
RO	14,111	1.63%	19,731	2.234%
SI	7,589	4.46%	22,794	13.40%

**It is assumed that all persons with disabilities who requested the Card received the Card. Countries in the pilot set in advance the number of Cards they wanted to issue, and most did not intend to provide it to all persons recognised as disabled. The Card in Malta is also the national disability card, hence 100% coverage.*

5.2.6. Link between policy options and objectives

The policy options presented above all aim to improve the access to services of persons with disabilities when travelling to or visiting other Member States. In this way policy options in areas A and B, together with the accompanying measures, correspond to the general objective of the initiative to facilitate free movement and equal access to services for persons with disabilities. Policy options A1 and A2 provide for a mandatory EDC model to be binding for all Member States. These policy options will facilitate the mutual recognition of disability status when persons with disabilities travel to or visit other Member States (specific objective 1). Policy options B1 and B2 will both facilitate the use of the EU parking card for persons with disabilities, while policy option B2 will contribute to a greater extent to increasing the legal certainty in its use (specific objective 2).

6. WHAT ARE THE IMPACTS OF THE POLICY OPTIONS?

The assessment of each group of policy options address their potential social, economic, digital and environmental impacts, impacts on the fundamental rights enshrined in the Charter, and impacts on competitiveness and SMEs. Benefits are evaluated qualitatively and – whenever possible – quantitatively. Costs are monetised whenever possible and, if monetisation cannot be achieved, they are evaluated qualitatively or in terms of their expected overall magnitude. All criteria and methodology are described in Annex 3 and Annex 4.

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 Member States 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 analysis of impacts is 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[76]. However, the data dates back to 2012 and there are some concerns about its representativeness to the population of persons with disabilities. Secondly, there is limited quantitative evidence on the impacts of the policy options because of 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, the relevant challenges in estimating the costs of the initiative for national authorities and local providers. There is limited information on costs incurred by the pilot Member States 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.

6.1. Assessment of the baseline scenario

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 (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.[77] However, the most likely outcome is that the travel gap would remain constant.[78] In this case, in the upper bound range 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 disability status. 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 of persons with disabilities are most likely. Their engagement in tourism will continue to be less, owing to the high uncertainty and disproportionately higher costs they face relative to the general population when travelling to other Member States, having consequences on their mobility and restricting their personal and social development, 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

[76] DG GROW Report.
[77] 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.
[78] For details, see section 2.4 How likely is the problem to persist?

Economic impacts

Costs for national administrations

The costs of the EDC for national administration are because 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.[79] Since most of the costs are fixed one-off costs[80], 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 from 20,000 to 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 EUR 1.02 and 4.54 per card.[81] 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 EUR 1,000 to 4,500 over the period 2016 – 2018.[82]

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 national administrations 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.

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 Member States have already added security features to the standard EU parking card model[83], therefore, it can be expected that more Member States will do so to fight fraud and forgery. The total costs will depend on the features added and the number of Member States implementing changes, and cannot be quantified *ex-ante*.

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[79] Study supporting the impact assessment: 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.

[80] Such as establishing the national website, database, etc.

[81] Study supporting the impact assessment: 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.

[82] Ibid.

[83] Ibid.: 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.

National authorities may incur additional costs to collect information and train staff on the different formats of the EU parking cards in place in other Member States, even though such costs can be expected to be minor.

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.[84] These higher costs are *de facto* foregone benefits for persons with disabilities. It is expected that almost half of persons with disabilities, travelling abroad experienced situation where they haven't benefitted from preferential conditions.[85] 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) Member State. The cost of parking fines varies depending on the Member State and can be substantial.[86] 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 Member States. The costs of parking in off-street structures were estimated at around EUR 1,100 per parking space, per year in 2013.[87] 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 EUR 4 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.[88]

Costs for service providers

Service providers from non-pilot Member States offering preferential conditions to persons with disabilities from other Member States 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. In addition, they may also miss out on financial and non-financial benefits due to the lower number of persons with disabilities from other Member States accessing their services.

The service providers who joined the pilot EU Disability Card initiative will continue to benefit from the easy recognition of cardholders from the participating Member States but will still face such costs as concerns persons with disabilities from the other Member States. When offering preferential conditions to persons with disabilities from other Member States, they are likely to have direct financial costs. However, this impact is not expected to be significant, given that customers

[84] Ibid. Assessment is based on short, 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 4.
[85] 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.
[86] Study supporting the impact assessment: 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).
[87] Scope of Parking in Europe. Data Collection by the European Parking Association, 2013. Available at: link.
[88] Study supporting the impact assessment

with disabilities from other Member States appear to make up about 1% of the total client base and a majority of the respondents reported low costs (below EUR 30 per customer).[89]

Reduced earnings in the market for accessible tourism for the society and economy

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.[90] The total direct economic contribution of accessible tourism at the EU level was estimated at EUR 62 billion, with an indirect multiplier of 1.84.[91] This indirect impact includes the jobs created by the tourism industry by the travel of persons with disabilities (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 disabilities and the general population of at least 6%, the economic loss due to the reduced travel of persons with disabilities can be estimated at roughly EUR 3.72 billion in the whole EU in 2012 (EUR 4.5 billion in 2023).[92]

Digital impacts

Recent technological progress can be expected to continue, bringing enhanced digitalisation for stakeholders such as public administrations, service providers and persons with disabilities.

While national administrations and citizens would likely benefit from EU funds[93] 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, Member States' authorities at the national or local level are moving to adopt such databases and improve enforcement of parking rights including for cardholders[94].

Environmental impacts

Small recurrent or additional emissions can be expected as persons with disabilities travel, but less than the general population.[95] These lower emissions, however, would be negligible because of the small share of persons with disabilities choosing to travel relative to the entire population of persons participating in tourism in the EU.

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[89] Study supporting the impact assessment based on the Survey targeted at costs for service providers.
[90] DG GROW Report
[91] An indirect multiplier indicates the value added generated indirectly for a given 1 euro expense (investment, etc.). The basic idea is to measure how a given spending will "ripple" throughout the economy.
[92] Study supporting the impact assessment
[93] 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.
[94] Study supporting the impact assessment: in Belgium 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, in the municipalities of Rome and Milan in Italy, enforcement of parking rights is currently undergoing a digitalisation process which also foresees the implementation of databases of cardholders.
[95] Study supporting the impact assessment

Fundamental Rights

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

- Freedom of movement (Art. 45 EUCFR): the lack of mutual recognition of disability status across Member States for persons travelling hinders their possibility to fully enjoy free movement rights[96].
- Integration of persons with disabilities (Art. 26 EUCFR): the lack of mutual recognition of disability status would continue to 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.
- Non-discrimination (Art. 21 EUCFR): some degree of discrimination and inequality in access to services would persist across the EU because persons with disabilities would continue to have limited access to preferential conditions provided by services in across the EU compared to residents. A significant part 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.[97]

Competitiveness and SMEs

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 companies working in the sector, the great majority of which are SMEs according to the World Tourism Organisation.[98]

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.[99]

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[96] Study supporting the impact assessment: 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 a majority of respondents to the public consultation. The problem can become more significant for persons with disabilities who require 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.

[97] Study supporting the impact assessment

[98] 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.

[99] Study supporting the impact assessment

6.2. 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)

Social impacts

The policy options are expected to have moderate positive social impacts, larger in the case of option A2. The EDC is likely to **increase the number of persons with disabilities travelling to other Member States**[100]. This impact will be achieved through reduced burden and costs and improved access to preferential conditions provided by some services. Under the more optimistic scenarios of increased participation in tourism[101] this could be expected to range between 70 and 75% by 2030, thus growing by between 1.1 and 6.4 percentage points compared to the baseline. This will result in 300,000 to 2 million additional persons with disabilities participating in tourism, compared to the baseline.[102] The travel gap between the general population and persons with disabilities would decrease by 1.1 to 6.3 percentage points. However, as described above such an optimistic increase is not realistic as it would be possible only in case of significant EU-wide improvements to accessibility and financial affordability of travel for persons with disabilities, in addition to the removal of the uncertainty regarding the lack of mutual recognition of disability cards / certificates.

Therefore, further calculations are made to provide more realistic scenarios that assess the potential impact of the policy options on the travel gap. For these calculations a specific question from the public consultation was used, which asked respondents to assess to what extent the European Disability Card could increase the number of persons with disabilities travelling in the EU. It must be underlined that the estimates should be treated only as estimations and must be interpreted with caution. The methodology is described in detail in Annex 8 Based on the above, it is estimated that option A1 may reduce the 6.3 percentage points travel gap by between **1.32 and 1.94 percentage points**. Option A2 would have stronger impact and is expected to reduce the travel gap by between **2.8 and 4.12 percentage points**.[103]

Option A2 would strongly reduce the uncertainty for persons with disabilities. Indeed, in the public consultation, five sectors that were outside the scope of the option A1 were mentioned by respondents among the most frequently used: Phones and Internet (55% of respondents), Travel agencies (22.5%), Sports centres (13.4%), 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%), Sports centres (26.7%), Travel agencies (23.6%), Electricity and Gas (17.9%), Postal Services (13.2%).

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

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[100] Ibid.: This is evidenced by all the data collections performed in this study and also by the results of the Study assessing the implementation of the pilot action on the EU Disability Card and associated benefits. Available at: link.
[101] Figure 2 in chapter 2.4.
[102] Study supporting the impact assessment: Estimates were obtained by comparing different scenarios of changes of the travel gap based on developments from 2012 to 2019: DG GROW Report
[103] Ibid.

when travelling to other Member States (307 out of 697). For instance, some museums explicitly state that foreign national disability cards or certificates "cannot be treated".[104] In addition, more service providers 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. Service 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.[105]

An important benefit for persons 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.[106] Transport was mentioned as the first sector that they would like to see covered by the EDC by 94% of persons with recognised disabilities in the public consultation.[107]

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 society.[108] The actual magnitude of such impacts would depend on additional factors, such as the level of accessibility of the sectors involved.

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. It would also create cost for public adminsitrations that heavily subsidise the transport sector. However, these costs would be compensated by the additional persons travelling accompanying persons with disabilities such as family and friends who will pay the travel themselves.

Distributional impacts across Member States

To explain the expected distributional impact of the initiative it is important to understand that the travel pattern of persons with disabilities does not necessarily follow traditional tourism patterns followed by the general population, for example "summer north/south travel". Evidence from the evaluation of the pilot EDC[109] showed that neighbouring countries are the first destination of choice for persons with disabilities since the geographical closeness makes travel easier and cheaper. 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

[104] Study supporting the impact assessment, see Annex 4 for a case of Hungary in individual travellers' journeys.
[105] Study supporting the impact assessment based on Survey on costs targeted at service providers
[106] 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
[107] Study supporting the impact assessment, see Annex 2 for results of the public consultation
[108] 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.
[109] 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. Available at: link.

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 potential destinations of persons with disabilities travelling across the EU.

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, but not necessarily completely eliminate them. 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 a case in which the duration of the stay increases up to 2 months, total savings are estimated at EUR 100 to 400.[110] For option A2, benefits 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 the process of recognition of disability status to a moderate, high or very high extent.[111] 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.[112]

The costs for service providers are not expected to be significant. Even in the most optimistic scenario, 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, such as family and friends, who are not the personal assistant and therefore do not benefit from preferential conditions.[113] The example of the

[110] Study supporting the impact assessment, a detailed description of how the estimates of cost savings for persons with disabilities were obtained and elaborated is provided in Annex 3.
[111] Study supporting the impact assessment based on Targeted survey
[112] Study supporting the impact assessment based on Survey on costs targeted at service providers
[113] Study supporting the impact assessment based on 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 (such as family and friends).

pilot EU Disability Card showed that the majority of service providers experienced benefits (monetary and non-monetary) which, at a minimum, outweighed costs.[114]

The 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. Cardholders are often accompanied by additional paying visitors (e.g. friends, family members), who otherwise would not have used the services, with the result that 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 that they better take account of persons with disabilities in their services and have gained new insights for the future development of their services.

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 disabilities and is most frequently linked to short-term stays. These calculations are outlined in Annex 4. Data on preferential conditions offered in a sample of 10 countries was collected and assessed in terms of direct costs for transport service providers.[115] By considering the proportion of those who do not yet benefit from preferential conditions, the direct costs of offering preferential conditions in the transport sector to persons with disabilities from other Member States are estimated to be between 0.1 and 1.9 EUR per capita, up to 0.2 and 3.9 EUR per capita when extending the preferential conditions offered to personal assistants, where the range depends on the country in question, its tourist flows, and the extent of preferential conditions currently offered to nationals.[116]

The Member States with the highest costs in transport, in absolute terms, are also the most populous ones, which are destinations of the majority of tourism trips in the EU and offer the most generous preferential conditions. For example, DE's costs range between EUR 23.6 and 28 million for persons with disabilites (aged 15-65) from other Member States (including personal assistants).

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[114] 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.

[115] 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, these estimates are very sensitive to two 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 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 annex, for each of the ten countries on which data was collected, a lower and upper bound range of direct total costs for transport services providers is given, assuming that currently either all or no persons with disabilities from abroad have access to preferential conditions..

[116] Ibid.

This represents 17.8% - 21.0% of the costs of offering the same preferential conditions to all persons aged 65+.

Similarly, costs for ES range between EUR 22 and 31 million.[117]

The true cost is certainly closer to the lower bound of the estimates for several reasons: firstly, 44% is the proportion of persons with a disability responding ever being denied access to preferential conditions abroad. The proportion in the transport sector is likely to be significantly lower, in particular with respect to discounted tariffs; secondly, an additional mitigation of the costs comes from the fact that persons with disabilities overlap with the elderly population, which often also benefits from similar preferential conditions. 18 out of 23 service providers responding to the targeted survey were already offering preferential conditions to persons with disabilities from other EU Member States.[118]

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.[119] While training staff is mostly a fixed cost, providing personalised service to the clients is rather a variable cost.

Policy options A1 and A2 would also entail some administrative costs for service providers linked to yearly reporting on the type of preferential conditions offered (e.g. data collection, data storage, data export and communication with national authorities). The costs would not be significant.[120]

In general, the adjustment, administrative costs and the cost savings per service provider are expected to be comparable for policy options A1 and A2.

Impacts for national administrations

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 national administrations in implementing the policy. In the EU Disability Card pilot project, costs 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.[121] The total estimated costs of producing and delivering the Card for the 19 Member States 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.

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[117] Ibid., see Annex 4
[118] Ibid.
[119] Study supporting the impact assessment based on Survey on costs targeted at service providers
[120] Study supporting the impact assessment based on the online workshop with service providers, held on 11 May 2023.
[121] 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.

Further adjustment costs would arise from non-legislative accompanying measure for 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 7,500 and 23,000 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.

It is important to indicate that the experience with the EU Disability Card pilot did not show any major unintended consequences in the participating Member States. This can also be attributed to the fact that the mechanism envisaged in the proposal – i.e. the issuing of cards to individuals – is already usual practice in all Member States. Taking into account the proportionality of the analysis, for example the impact on the transport sector is very relevant to tourism and has a large number of preferential conditions, and at the same time is also often subject to subsidies from the public budget. Based on the aggregated data on the costs in comparison to turnover and, as demonstrated by the figures in annex 4, the total costs are assessed to be negligible (and by extension are therefore negligible also for public service providers).

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. Costs related to replying to questions, handling complaints and gathering data for the monitoring of implementation are not considered here as they are only a small fraction of total costs.

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 in the EU would increase their demand for tourism products and cause the sector to moderately expand. As anticipated in chapter 6.1. on the impacts of the baseline scenario, this would also have positive indirect effects, such as advantages for secondary markets. The overall aggregate economic impact reflected in the accessible tourism value added, is estimated to be in a range between 1 and 1.5 billion EUR for option A1 and between 2.1 and 3.1 billion EUR for option A2.[122] 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.

[122] Study supporting the impact assessment, see Annex 9.

Digital impacts

Policy options A1 and A2 would entail similar **limited positive indirect 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 would be.

A second digital impact would be linked to the minimum common standards to be followed by national administrations 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 administrations 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.

The total EU27 one-off costs for public authorities to build an IT system for digital EDC are estimated to be EUR 1.67 million, with recurring maintenance costs estimated at around EUR 250,000 per year when issuing cards for all persons reporting "severe" limitations (this is the group of persons with disabilities who is likely to get EDCs).[123]

Environmental impacts

The environmental impacts would be twofold, but small. Firstly, the negative environmental impact of travel may increase due to an increased number of persons with disability travelling within the EU. Both options might however redirect some 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 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. 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 CO_2 equivalent.[124] In this context, assuming a future production of EDCs in a range between 5 and 16 million,[125] the overall environmental footprint

[123] Study supporting the impact assessment.

[124] Uwe Trüggelmann, 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 CO_2 equivalent.

[125] Study supporting the impact assessment: 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. 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.

would be in the range of 200 to 640 tonnes of CO_2 equivalent, comparable to the total yearly of emissions of around 60 EU residents.[126]

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

Fundamental rights

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

- **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.
- **Integration of persons with disabilities** (Art. 26 EUCFR): the policy options would be beneficial to ensuring social inclusion and integration of persons with disabilities.
- **Non-discrimination** (Art. 21 EUCFR): the policy options 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.

SMEs and competitiveness

Policy options A1 and A2 are not expected to have significant impacts on competitiveness and SMEs and those that will occur would likely be positive.

In the targeted survey for service providers, 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 Member States, 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.[127] 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.[128]

[126] 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.
[127] Study supporting the impact assessment based on Survey on costs targeted at service providers
[128] Study supporting the impact assessment based on Respondents to the online workshop with service providers held on 11 May 2023.

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.[129]

6.3. Assessment of policy options aimed at facilitating use and legal certainty in the use of the EU parking card for persons with disabilities (Area B)

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. The extent of this increase is difficult to quantify. For option B1 the increase is likely to be limited compared to baseline, given the voluntary nature of the option. On opposite, the mandatory nature of option B2 is expected to reduce uncertainty for persons with disabilities and hence boost their propensity to travel more. Thus the estimated impact of option B2 to reducing the travel gap ranges between 0.27 and 0.4 percentage points.[130] 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.

Benefits for persons with disabilities would be due to more accessible information on the EU parking card conditions, reducing time costs for obtaining the information.[131] Cost savings would also come from the reduced / avoided fines[132] caused by the lack of recognition of EU parking cards and by the lack of knowledge on the rights granted in different Member States.[133]

Economic impacts

Impacts for national administrations

The benefits (cost savings) would be linked to a reduction in the enforcement cost for public authorities due to implementation of the enhanced security features of the EU parking card. These cannot be quantified precisely, as mainly depending on the time savings linked to homogeneous security features of EU parking cards. Furthermore, the establishment of national databases

[129] 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.

[130] Study supporting the impact assessment, see Annex 8for explanation of methodology.

[131] Study supporting the impact assessment: 17 out of 24 respondents to the targeted survey for persons with disabilities reported that differences in the EU parking cards increased their costs for obtaining information about the different parking conditions granted.

[132] Study supporting the impact assessment, the cost of fines are included in Annex 3.

[133] 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.

providing information on the number and identity of residents that are cardholders would be especially beneficial for enforcement authorities.[134] The presence of such data storing systems would make enforcement of parking rights easier at the 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 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 national administrations to update the card to reflect the revised EU model, and its security formats and features.[135] The total costs are expected to be minor for national administrations. 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.[136] 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. 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. 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.[137] These costs would be limited to the Member States not already in possession of such a database and would only be incurred by the Member States choosing to implement the updated Recommendation.

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 EU Disability Card, 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 EUR 7,524 and EUR 22,936 per Member State. The annual variable maintenance costs ranged between 0 and EUR 4,652 per year.[138] 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.

Wider macroeconomic benefits in the market for accessible tourism

[134] Study supporting the impact assessment based on Respondents to the online workshop with CSOs held on 22 March 2023.
[135] 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.
[136] Study supporting the impact assessment based on Survey targeted at NCAs.
[137] 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.
[138] Study supporting the impact assessment: some Member States reported no significant cost of maintenance.

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 smaller. The yearly value added for accessible tourism[139] of option B2 is estimated at 0.2 - 0.3 billion EUR.[140]

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 Member States. 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.

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 impact may be linked to the increased production of the EU parking cards to replace previous ones. However, as demonstrated for policy option A2 and considering the lower number of parking cards issued, 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.

Fundamental rights

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

[139] Accessible tourism widely understood as described in options A1 and A2.
[140] Ibid. See Annex 9.

- **Freedom of movement** (Art. 45 EUCFR): the policy options entail to a greater extent a facilitation of the free movement of persons with disabilities, as a result of greater certainty in the recognition of EU parking cards across the Member States.[141]
- **Integration of persons with disabilities** (Art. 26 EUCFR): increased travel propensity of cardholders and 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.

Competitiveness and SMEs

The policy options B1 and B2 are not expected to have any significant impact on competitiveness and SMEs. As discussed above, the increased participation of persons with disabilities in tourism due to more certainty regarding the recognition of EU parking cards across the EU would be beneficial for 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.

Summary of estimated impacts per option

This table below presents the figures related to the accessible tourism value added in the above sections "Wider macroeconomic benefits in the market for accessible tourism" in two scenarios, namely a more optimistic one assuming a higher reduction of the travel gap of 6.3 percentage points and a second scenario with a more moderate reduction. Details of the calculation are included in Annex 9.

Table 3: 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 – assuming a higher reduction of the travel gap		Scenario 2 – assuming a moderate reduction of the travel gap	
	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

7. HOW DO THE OPTIONS COMPARE?

The options for each policy area (A and B) are compared against the baseline for the criteria of effectiveness, efficiency and coherence. When rating the policy options, the social, economic,

[141] Study supporting the impact assessment based on Survey targeted at NCAs and Survey targeted at EU CSOs, 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. See Annex 2.

environmental, digital impact and the impacts on fundamental rights, competitiveness and SMEs (details in Chapter 6) were all taken into account. Based on this assessment, a preferred option is identified for both policy areas and then described in Chapter 8.

Policy options are scored from "0" to "+++" ("---") depending on the direction of the impact. "+" ("-") represents a very small positive (negative) effect and "+++" ("---") a very large positive (negative) effect compared to the baseline. 0 means that the option would not constitute a significant deviation from the baseline scenario. The baseline scenario is rated 0. For details see Annex 4.

Effectiveness

The key criteria to assess effectiveness is the extent to which they contribute to the objectives (Section 5) and they ease the free movement of persons with disabilities within the EU by facilitating (i) mutual recognition of disability status when persons with disabilities travel to or visit other Member States (Policy area A) and (ii) use and legal certainty in the use of the EU parking card for persons with disabilities (Policy area B). Each policy area is assessed separately. See summary overview of the effectiveness in Table .

Under Policy area A, both options score positively. By mandating the production and use of a EDC, both policy options would effectively create a tool that could be easily recognised across borders for the purposes of accessing services by persons with disabilities. The same format across the EU and the addition of security features will further enhance its acceptance by reducing risks of fraud and uncertainty about the validity of the card. All this will facilitate the mutual recognition of disability status of cardholders in other Member States, especially for those with invisible disabilities. Policy option A1 is quite effective. In addition to reducing uncertainty it increases access for persons with disabilities to preferential conditions abroad by ensuring the recognition through the Card in the sectors that are very important for them: culture, leisure, sports and transport. Policy option A2 is the most effective. It would extend the validity of the EDC to all services offering preferential conditions (with or without remuneration). This would remove any uncertainty related to the access of 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 option A1, and the reason why the policy option has a higher score on effectiveness.

Under Policy area B, both options score positively. Introduction of common security features following the updated model would make the parking card more uniform across Member States, facilitating its use and recognition. Some aspects of policy option B1 would, however, limit its effectiveness. It would be left to Member States to decide whether to adopt/implement the new security features and to adhere to the EU parking card model, as well as when this would be done. Thus, the divergences and uncertainty could/would remain. The effectiveness of policy option B2, on the other hand, is higher: 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.

The accompanying measures would enhance the effectiveness of all options. With more/better information and awareness raising, cards will be easier recognised and used by all stakeholders.

Table 4 – Comparison of the effectiveness of options under Policy Areas A and B in relation to the baseline

Specific objective	Policy Option	Assessment
	Baseline	0
Specific Objective 1: To facilitate mutual recognition of disability status when persons with disabilities travel to or visit other Member States.	Option A1	++
	Option A2	+++
Specific Objective 2: To facilitate use and legal certainty in the use of the EU parking card for persons with disabilities.	Option B1	+
	Option B2	+++

Efficiency

'Efficiency' refers to the assessment of the benefits of each option as opposed to its associated costs. As only some benefits can be monetized, the efficiency is operationalised as cost-effectiveness, looking at each category of stakeholder. Also in this case, all policy options are compared to the baseline scenario (section 6.1). Table at the end of the Section summarises the efficiency scores of the policy options.

Under Policy area A, both options score positively. For both options, resources will be required by national administrations 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 envisaged by the policy option. These costs are not expected to differ substantially between policy options A1 and A2. The costs for service providers offering preferential conditions would be minor for both policy options. In spite of incurring some costs, their expected benefits will offset the costs, as reported by all service providers involved in all dedicated data collections.

As most of preferential conditions in terms of savings are offered in the sectors covered by option A1, the greater efficiency of option A2 relative to option A1 comes mostly from the larger reduction in uncertainty for persons with disability, which is expected to compound the positive impacts on their travel propensity. Removing any uncertainty related to the provision of preferential conditions, even in sectors where reduced tariffs and discounts are less relevant, option A2 achieves greater benefits with comparable costs to option A1, and is therefore deemed more efficient.

Under Policy area B, option B1 would not require Member States to make changes to their national parking card models. Therefore, the increase in benefits is uncertain and would likely be limited. Policy option B2, would entail higher costs compared to the baseline, as it would 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 higher cost savings compared to the baseline.

The accompanying measures would enhance the efficiency of all options. With more/better information, cards will be easier recognised and used by all stakeholders.

Table 5 – Comparison of the efficiency of options under Policy Areas A and B in relation to the baseline

Specific objective	Policy Option	Rating
	Baseline	0
Specific Objective 1: To facilitate mutual recognition of disability status when persons with disabilities travel to or visit other Member States.	Option A1	++
	Option A2	+++
Specific Objective 2: To facilitate use and legal certainty in the use of the EU parking card for persons with disabilities	Option B1	0
	Option B2	+

Coherence

"Coherence" refers to the consistency of each option with the values, aims, objectives and policy initiatives of the EU. The key ones identified are the EU disability acquis, fundamental rights of the EU, UNCRPD, the EPSR. Table summarises the ratings of the policy options in terms of coherence.

Under Policy area A, both options have the same positive rating. Both policy options would fit into a series of EU initiatives that have recently facilitated the movement of persons with disabilities in the EU. In this context, an initiative such as the EDC would fill a gap in current legislation. The highest degree of coherence of the policy options in reaching specific objective 1 would be reached, however, in combination with the pilot EU Disability Card initiative undertaken by the 8 EU Member States 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 Member States. 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. Both would consequently be assigned the same ranking.

Also under Policy area B, both 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.

Table 6 – Overview of ratings of the baseline and policy options in terms of coherence

Specific objective	Policy Option	Rating
	Baseline	0
Specific Objective 1: To facilitate mutual recognition of disability status when persons with disabilities travel to or visit other Member States.	Option A1	+++
	Option A2	+++
Specific Objective 2: To facilitate use and legal certainty in the use of the EU parking card for persons with disabilities.	Option B1	+++
	Option B2	+++

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. Both policy options concerning the European Disability Card respect the principles of subsidiarity and proportionality, and are given the maximum rating in relation to this criterion. They create an instrument that acts as a 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 the EU action. This conclusion is based on the details provided in the subsidiarity grid in the accompanying document.

Table 7 – Summary overview of ratings of the options

Criteria/options	**Baseline**	**Policy area A: Facilitating mutual recognition of disability status in the EU**		**Policy area B: Facilitating use and legal certainty in the use of the EU parking card for persons with disabilities**	
		Option A1	**Option A2**	**Option B1**	**Option B2**
Effectiveness	0	++	+++	+	+++
Efficiency	0	++	+++	0	+
Coherence	0	+++	+++	+++	+++

Potential net benefits of the policy options

To compute the net benefits of the policy options, a rather 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, given the available data and assumptions made, is expected to be a lower bound estimate of the overall net benefit of the policy options. See Annex 9 for detailed quatification of the costs.

Table 8 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	

8. PREFERRED OPTION

Under Policy area A, the preferred option is A2 with the highest overall score as well as per criterion. While the option would have higher total costs compared to the baseline, the magnitude of these costs would be limited for both Member States 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 disabilities such as family and friends) and significant benefits for persons with disabilities. Option A2 entails higher benefits for persons with disabilities also 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 national administrations in terms of producing, distributing and advertising the card would remain the same. Thanks to its wider scope, option A2 would also lead to improvements in the participation in tourism of persons with disabilities thus bringing more pronounced social and economic impacts.

Under the policy area B, the preferred option is B2. It 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 Member States than option B1.

A combination of policy option A2 (the introduction of an EDC in all Member States on a mandatory basis) with option B2 (an EU legislative act to provide for the mutual recognition of EU parking cards based on a common EU model) is found as the most favourable and thus the preferred policy option.

Option A2 is the most effective at facilitating the mutual recognition of disability status, as it mandates the creation of the EDC and can be easily recognised across Member States. The EDC would eliminate uncertainty for both service providers having to check disability status of customers and for persons with disabilities travelling and/or visiting other Member States having to prove their disability status. Persons with disabilities would be able to rely on a homogeneous card showing disability status and valid at the EU level, and thus access preferential conditions across the EU.

Option B2 is the most effective at facilitating the recognition of the EU parking cards. As a binding legislative instrument it makes mandatory the minimum requirements of the EU common parking card model and its security format and features. The common format of EU parking cards would reduce uncertainty linked to their recognition in line with specific objective 2. This would encourage cardholders to travel to other Member States by car. It would also lead to cost savings, due to using public parking slots reserved for persons with disabilities rather than different parking spaces (e.g. private parking garages), which may be more costly and less accessible for cardholders.

The main adjustment costs would be linked to the update of the security formats and features of the EU parking cards and to the set-up of national databases to monitor cardholders and enforce parking rights. Additional costs would also include the cost of setting up and maintaining national websites

providing information on the EU parking card, foreseen as an accompanying measure. These would be similar to the same costs for option A2.[142]

In summary, the above mentioned ranges of travel gap reductions for policy options A2 and B2 lead to a yearly value added in the market for accessible tourism, with estimates ranging from 2.8 to 4.12 billion EUR for A2, and from 0.27 and 0.4 billion EUR for B2.[143]

After taking account of the costs mentioned above, namely of offering preferential conditions, production of the cards, and other additional costs, the possible net benefits of the combination of the preferred options are shown below.

Table 9: Total conservative estimates for net benefits of the preferred policy options

Policy Options	Conservative net benefit estimate	
A2	1.56 billion EUR	
B2	0.056 billion EUR	
Total (A2+B2)	1.616 billion EUR	

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 by Member States, which would retain the power to determine disability status in accordance with their own assessment criteria and procedures enshrined in their national law. Policy option B2 would not affect Member States' 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 EU parking card, justified by the need to ensure full recognition of the card across Member States.

For the legal bases described in section 3.1, the ordinary legislative procedure applies. Therefore, the preferred instrument is a Directive, as it is the common instrument to the legal bases concerned.

One in one out

The expected **administrative costs for businesses** will be marginal. Having one recognisable card would save administrative time used for informing staff about the rules on the acceptance of such cards, as well as regards handling complaints of persons with disabilities whose national disability card is not recognised abroad.

Based on the evidence available, the European Disability Card does not bear a high cost on service providers who have so far voluntarily participated in the pilot scheme. In contrast, it appears that

[142] All these costs, as well as the benefits of option A2 and B2 are broken down, further detailed and quantified – whenever possible – in Annex 3 together with a table detailing the impacts of the measure on competitiveness and SMEs. Overview table for all options in added in Annex 8.
[143] Study supporting the impact assessment

service providers have high economic and social returns due to their participation as they attract new customers and gain positive publicity. Possible, although limited, costs could arise from training their staff to recognise the Card and from monitoring the use of the card. Businesses might need to bear the costs of reduced income (e.g. museums that will charge reduced fees, or parking fees not collected from non-national holders of the European Disability Card). However it is not expected that the share of non-national disability card holders in the total number of people benefiting from similar discounts will be important enough to have a noticeable negative impact on the concerned businesses, and the initiative is expected to entice more persons with disabilities to travel (jointly with friends and family), thus raising the overall return for concerned businesses.

Persons with disabilites are expected to benefit from the initiative, which will decrease uncertainty as to whether their disability cards/certificates would be recognised and they would get access to preferential conditions. They will have direct monetary benefits from preferential conditions and reduced risk of having to pay fines for lack of recognition of the European Parking Card or having to pay for a parking spot.

9. HOW WOULD ACTUAL IMPACTS BE MONITORED AND EVALUATED?

A monitoring framework has been designed with a view to tracking progress towards achieving the objectives. It includes a series of core indicators related to the objectives of the initiative. These and the related data sources are summarised in Annex 7, table 2.

The monitoring framework will be subject to further adjustment according to the final legal and implementation requirements and timeline. The initiative could be evaluated 5 years after it enters into force in line with the Better Regulation Guidelines. This would take into account an eighteen-month period of transposition by Member States, allow sufficient time to evaluate effects on national administrations and service providers, which may need some time to adapt to the new rules.

ANNEX 1: PROCEDURAL INFORMATION

Lead DG, Decide Planning/CWP references

DG EMPL, Unit D3, has a lead for the Impact Assessment on the European Disability Card. An impact assessment was validated in the Decide Planning under reference PLAN/2022/1525.

Work Programme reference: COM(2022) 548 final

The Call for Evidence was published in November 2022. The Public Consultation was published in February 2023 and finished on 5 May 2023.

Organisation and timing

The impact assessment on the European Disability Card was coordinated by an Inter-Service Steering Group (ISSG) managed by the Secretariat General, which was established in 2022. Representatives from Secretariat General; DG for Employment, Social Affairs and Inclusion; Legal Service, DG for Mobility and Transport; DG for Competition; DG for Justice and Consumers; DG EAC; DG ARGI; DG for the Internal Market, Industry, Entrepreneurship and SMEs; DG Communications Networks, Content and Technology; the European External Action Service; DG for Neighbourhood and Enlargement Negotiations; DG for Financial Stability, Financial Services and Capital Markets Union; were appointed to the Steering Group.

In total, 7 meetings of the ISSG were organised to discuss this impact assessment (on 20 July and 12 October 2022, 12 January, 12 May, 9 June, 19 June and 24 July 2023. The ISSG has in addition been consulted in writing on interim report and first draft of the final report of the Study supporting the impact assessment during Q1-2 2023.

The Impact Assessment was assessed by the ISSG in two meetings: on 9 June and on 19 June 2023.

Consultation of the RSB

The draft impact assessment report was reviewed by the Regulatory Scrutiny Board (RSB) on 18 July 2023. The RSB delivered a positive opinion with reservations on 19 July 2023. The revisions introduced in response to the RSB opinion are summarised in the table below.

RSB's requests for improvement	**Changes made in the IA**
(1) The report is not sufficiently clear on Member States' views and support for the problems, and the need for EU legislative action. It does not explain on which issues, and why the views of different categories of stakeholders differ. The report should bring out more clearly the views of Member States on essential parts of this initiative. For example, it should explain to	**Information about the Member States' positions was included in the text, in section 5.2.5. and thoroughly in Annex 2.**

what extent Member States support the problem analysis, the proportionality and EU value-added of policy options, and the justification for the selection of the preferred option. It should explain why some parts of stakeholder groups do not support some options or measures contained therein.	
(2) The report is not sufficiently clear on the specific part of the 'travel gap' that will be tackled by the options considered. It is not clear on the expected level of the value added to the market for accessible tourism for each option. The report should clarify upfront that the initiative is not intended to solve all problems facing disabled people when traveling but instead is focused on non discrimination. It should thus clarify the part and the root causes of the indicated 'travel gap' that will be tackled by the options considered in this report and the part of the 'travel gap' that is due to factors outside the scope of the initiative. On that basis, it should estimate the expected contribution of the options to reduce the total 'travel gap' (which according to the report amounts to EUR 4.5 billion of the total value added of the market for accessible tourism). It should explain to what extent the effective delivery of the options depends on the availability of potential complementary measures (such as financial support, availability of personal assistants, etc) which are outside the scope of this initiative.	**The chapter on impact of the options – in particular sections 6.2 and 6.3 – was enriched by estimates of the expected contribution of different options to reducing the travel gap. These estimates were also included in the tables with benefits and costs.** **The limits of the initiative were clarified in section 4.** It is made clear that the scope of the initiative is intended not to solve all problems faced by persons with disabilities when travelling or visiting other Member States but rather focus on mutual recognition of disability and access to preferential conditions on equal basis as residents with disabilities.
(3) The report is not sufficiently clear on the impacts on public authorities, institutions and public budgets and on the distributional impacts across Member States. The report should further assess the impacts, costs and benefits for national administrations and public authorities, including local and regional public institutions, reflecting differences between Member States as well as those likely to be most affected. It should assess the potential risk that due to the	**Summary information on costs was added into chapter 7 and new Annex 9 on comparison of the options. The overall table on benefits and costs for all retained options was complemented by other benefits/costs and is placed in the same new Annex.** **Annex 3 was revised to provide clear overview of costs and benefits for the preferred options.**

increased travel intensity of persons with disabilities, public interest actors may face resources or budgetary challenges (e.g. investments in additional reserved parking capacity or price increases for subsidised services). It should discuss more thoroughly the impacts on the transport sector and ensure consistency of the presented estimates throughout the analysis. It should analyse distributional impacts across Member States, including potential substitution effects between domestic and intra-EU travel.	**Information on the distributional impacts was added into section 6.2.** The text explains, based on the Pilot Project, the travel patterns of persons with disabilities leading to an even distributional impact among Member States.
(4) It does not sufficiently identify and present the quantitative cost and benefit estimates of all options as part of the effectiveness and efficiency assessment when comparing options. The report should better present and integrate the available cost and benefit estimates into the efficiency and effectiveness assessment when comparing the options, thereby allowing a better understanding of the differences of the efficiency scores between options.	**Annex 8 was added into the report with detailed tables on Comparative overview of impacts and related ratings for the effectiveness and efficiency criteria, and corresponding description.**
(5) The report should revise the One In, One Out section; it should only include costs and cost savings to citizens and businesses.	**The One In, One Out section at the end of section 8 has been revised, only information about costs and benefits for citizens and businesses are included.**
(6) Annex 3 should provide the benefits and costs of the preferred option in an integrated manner so that it is clear what the overall costs and benefits of the preferred combination of option are. All costs should be presented in total aggregate (EU) values (no cost estimate per capita, customer, card etc).	**Annex 3 was revised and presents all costs in total aggregate values. Moreover, the overall table on benefits and costs for all retained options was complemented by other benefits/costs and is placed in Annex 8.**
(7) The competitiveness check (Annex 5) should be reviewed; it should better explain the impacts on the affected EU tourism sectors and better justify the scoring on cost and price and international elements.	**The competitiveness check that is included in Annex 5 was reviewed; estimated costs were added (254 and 353 million EUR yearly for A2, roughly 40 million EUR to 55 million EUR yearly for B2) for the whole EU together with the narrative as concerns the impacts on the EU tourism sectors and international elements.**

Evidence, sources and quality

The impact assessment is based on several sources, using both quantitative and qualitative data, collected from Member States, organisations of persons with disabilities, civil society. This includes:

- Contracted Study supporting the impact assessment carried out by an external, independent consultant;
- Stakeholder consultation activities (see Annex 2);
- The Commission's experience in monitoring and implementing the rights of persons with disabilities;
- Assessment of the previous pilot project on the EU Disability Card: "Study assessing the implementation of the pilot action on the EU Disability Card and associated benefits".[144]

ANNEX 2: STAKEHOLDER CONSULTATION (SYNOPSIS REPORT)

INTRODUCTION

This synopsis report outlines the consultations that were organised as part of the work on the initiative on the European Disability Card (EDC) and the European parking card and presents their main findings in support of the impact assessment.

CONSULTATION STRATEGY

Objectives

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** in the EU to support the preparation of the EDC initiative.

In particular, the **consultation aimed to:** (1) gather service providers' and the general public's views on the initiative; (2) collect opinions and evidence on the problem and various solutions (policy options) to address it; and (3) create a robust and evidence-based analysis.

Four key problem areas subject to the analysis are: (1) In the EU, around 85 million persons 16+ have some form of disability. They still face barriers to their full participation in society; (2) Persons with disabilities face hurdles that may prevent or deter them from moving freely, especially because there is no mutual recognition of disability status among Member States; (3) This lack of mutual recognition of the disability status (national disability cards / certificates) may create

[144] https://op.europa.eu/en/publication-detail/-/publication/4adbe538-0a02-11ec-b5d3-01aa75ed71a1/language-en/format-PDF/source-287685618

barriers in relation to access to preferential conditions for persons with disabilities provided by some services during their travel across borders; and (4) Differing formats of the European parking card hinder its recognition in other Member States.

Stakeholders

Across these four topics, a wide range of stakeholders operating at the international, EU and national levels were consulted: **(i) those having an interest in the matter** (e.g., national public authorities, service providers, NGOs): **(ii**) **potential beneficiaries** of EDC and/or European Parking Card (e.g., persons with disabilities, personal assistants); and **(iii) experts** (e.g., researchers, consultancies and advisors, international organisations).

Consultation methods

The stakeholder consultation included: **(a)** a public consultation, **(b)** strategic and **(c)** targeted interviews (10 interviews), **(d)** six targeted online surveys, **(e)** three online workshops, **(f)** six focus groups and **(g)** six case studies. Stakeholders could send comments on the Commission's **(h)** Call for evidence. Majority of the consultation activities were organised by an external contractor in the context of a study supporting the preparation of the impact assessment. The Commission also consulted Member States' authorities and CSO representing persons with disabilities, which are members of the **Disability Platform**. The discussions through meetings and its specific sub-group on EDC were key to obtain feedback for its fine tuning.

The Commission's minimum consultation standards have been met.

Table A2.1: 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	✓	✓		✓				
Persons with disabilities		✓		✓				
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 policymakers (Commission)			✓					
EU bodies					✓			
EU parking associations					✓			✓
Researchers/academics		✓			✓			

OVERVIEW OF CONSULTATION ACTIVITIES

The **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 Commiss'on'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[145], 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 Member States:** Belgium (77 replies), Germany (47) France (30), Italy (22) Spain (20), Finland (9), Ireland (8), the Netherlands (7), Austria (7), Poland (6), Slovakia (5) Portugal (5), Lithuania (4), Estonia (4), Sweden (3), Luxembourg (3), Greece (3), Romania (2), and Cyprus (2). In addition to the EU Member States, there were replies from the UK (3) and Switzerland (1).

Public consultation was open for 12 weeks from 16 February 2023 until 5 May 2023 to ensure that the impact assessment and the proposal for a European Disability Card well reflects the general public views from a wide range of stakeholders across the EU. In particular, the consultation aimed 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 standard questionnaire received 1204 responses. It received **3361 replies** – in three different formats to ensure accessibility: **(1)** Standard questionnaire online via Have your Say: 1204 replies; **(2)** Easy-to-read format online via EU Survey: 2135 replies; **(3)** Accessible Word document via email: 22 replies. **Across all the stakeholders' categories, the majority (78%) of respondents were persons with disabilities (2632), most of them with a recognised disability (1932 respondents:** 760 in the standard questionnaire + 12 in the accessible word documents + 1160 in the easy-to-read version**). Responses were received from all EU Member States**.

[145] Detailed statistics are available here on the website of the webpage of the Call for evidence on the website of the European Commission

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 of past EU initiatives (EU Disability Card pilot, European parking card for persons with disabilities), as well as the feasibility to introduce a mandatory EDC in all Member States. They were conducted with representatives of the Commission's Directorates-General for Justice and Consumers (DG JUST) and for Mobility and Transport (DG MOVE).

Ten targeted interviews were conducted with three EU bodies, two EU-level CSOs, two EU parking associations and an expert in the field of disability. The aim was to collect further evidence on gaps and issues affecting the exercise of free movement rights of persons with disabilities travelling for short-term stays in the EU, as well as stakeholders' opinions on the EDC initiative. The interviews were conducted online via Teams, based on tailored guidelines.

An online survey ran from 25 January 2023 to 19 February 2023[146]. The purpose was **(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 **(i)** national competent authorities (NCAs): 25 replies from 15 Member States[147], **(ii)** persons with disabilities: 24 replies from 4 Member States[148], **(iii)** national CSOs: 23 replies from 11 Member States[149], **(iv)** EU-level Civil Society Organisations (CSOs): 10 replies[150], **(v)** other national public authorities: 5 replies from 3 Member States[151], and **(vi)** EU-level service providers associations and their national members: 2 replies from 2 Member States[152]. An additional **online survey** was launched from 16-26 April 2023, due to the low number of service providers replying to the first online survey. This second questionnaire targeted **607 service providers** in all Member States and was focused on **costs and benefits** linked with the introduction of the EDC. **In total, 23 responses were received from service providers operating in 13 Member States[153] in the following sectors:** Cultural Services (6), Public Transport (3), Amusement Parks (3), Private Transport (1), Parking (1), Travel Agencies (1), Services in the Field of Tourism (1), Sports Centres (1), and other services[154] (6). 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).

As concerns the low response rate to the online surveys, the contractor together with the European Commission made efforts to obtain replies from as many stakeholders as possible to the

[146] The surveys have been administered and centrally managed in the context of the supporting study using the Qualtrics tool

[147] 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

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

[149] Number of replies by MS: AT 3, CY 1, EL 1, FI 1, FR 1.

[150] EU-level CSOs do not represent any Member State.

[151] Number of replies by MS: BE 1, CZ 3, LV 1.

[152] Number of replies by MS: AT 1, BE 1.

[153] 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.

[154] Other services: Accessibility consulting and services, Translation and Interpreting Services, Contribution to Education in Scientific and Technical Field, Tourism, Public Sector and one additional blank response

surveys. The contractor sent reminders and the Commission also sent reminders to encourage the stakeholders to take part in the surveys. Unfortunately, the response rate remained low. That is a particular issue for the transport sector, where the relevant stakeholders, including the main umbrella organisations were reached out to, however, apart from 3 public transport providers and 1 private transport provider from Austria, Germany and Romania, did not react.

During the study, three **online workshops** were organised. The aim was to share and validate preliminary results from the study and to discuss **(i)** the 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)** the likely impacts of these possible EU measures in terms of both positive and negative effects. The workshops consisted of a **(i)** plenary session to present the identified problems, the policy objectives, and the list of identified policy measures; **(ii)** break-out sessions with open questions and polls (section 3.4) addressed and discussed with smaller groups of participants; and **(iii)** second plenary session to discuss the outcomes of the break-out sessions. The three workshops **involved 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).

Originally, the consultation strategy included **six focus groups with services providers** from selected Member States (i.e., Austria, Belgium, Finland, France, Italy, and Romania), 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 persons with disabilities from other Member States. However, **only service providers from Romania** finally participated in a focus group held online on 27 April 2023 in Romanian. It involved 14 service providers from sectors i.e., transport (9 public sector and 1 private sector); culture (3); and sports (1). 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.

Six case studies were performed on Austria, Belgium, Finland, France, Italy, and Romania to present different models and experiences on the implementation of the European parking card and to draw lessons and recommendations to improve its functioning. As part of the case studies, **semi-structured 1h-interviews were conducted online via Teams with: (i)** Seven public authorities responsible for the European parking card's entitlement, issuance, and delivery, either at local or national level in five Member States (AT, BE, FR, IT, RO); **(ii)** Seven CSOs representing or advocating the rights of persons with disabilities in five Member States (AT, BE, FI, FR, IT); and **(iii)** Four parking associations in four Member States (BE, FI, FR, IT). The interview minutes were shared with the interviewees for review and to enable them to share any additional information.

RESULTS OF THE CONSULTATION ACTIVITIES

CALL FOR EVIDENCE

Problems

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 persons with disabilities to plan travels (17 CSOs, 6 EU Citizens, 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

Regarding the **scope**, the majority of respondents were in favour of an EDC that **(i)** is mutually recognised across the EU (97 EU Citizens, 20 CSOs, 1 SME, 1 Other); and **(ii)** 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: **(i) Double format,** plastic and digital, including a QR Code; **(ii) A common pictogram**, **including the logo of the related disability type** to make stakeholders aware about specific needs (e.g., for cochlear implant users, captioning, speech-to-text); and **(iii)** a **relief structure** in the form of a scannable embossed alpha numerical information (as braille printing).[155]

To further enhance the implementation and use of EDC, respondents proposed the establishment of the following **mechanisms**:

- **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 eligible persons and cards released and recording cases of fraudulent use of the card (23 CSOs, 3 PAs, 1 EU Citizen and 1 SME).
- **An EU-wide control system and an EU authority to oversee and monitor** compliance with the EDC rules, working with national authorities to ensure proper implementation of the EDC by all the Member States and stakeholders (14 CSOs, 2 PAs, 1 EU Citizen, 1 Other).
- **An EU-wide awareness-raising campaign** to inform all the stakeholders involved (i.e., users, service providers, national authorities, general public) about the card, its features and benefits (16 CSOs, 1 EU Citizen, 1 PA, 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 (24 CSOs, 1 EU Citizens, 1 PA, 4 Other).

Impacts

On one side, respondents welcomed the initiative, emphasising that the adoption of a mutually recognised EDC will **(i) facilitate the freedom of movement** for persons with disabilities in the EU, also making easier travelling in EU (92 EU Citizens, 43 CSOs, 15 Other); **(ii) improve the independence and living conditions** of persons with disabilities and their families (28 EU Citizens, 12 CSOs, 3 PAs, 2 SMEs); and **(iii) promote inclusion and more equal opportunities** for persons with disabilities.

On the other side, respondents pointed out some **concerns about costs incurred by service providers** with respect to **(i) investments** into infrastructure, technologies, people and skills, depending on the type of disability (6 CSOs, 2 EU Citizens, 5 Other); and **(ii) Handling of sensitive customers data** (11 CSOs and 4 EU Citizens,).

[155] Call for evidence's detailed replies on the EDC card's design: (i) double format: 23 CSOs, 6 EU Citizens, 1 PA, 2 Other; (ii) A common pictogram, including the logo of the related disability type: 7 EU Citizens, 3 CSOs, 1 PA, 2 Other; (iii) a relief structure: 4 CSOs, 2 EU Citizens, 1 other.

PUBLIC CONSULTATION (by stakeholders groups)

When reading the main results of this consultation, it is important to note that the total number of respondents varies across the questions highlighted. The reason is because the easy-to-read questionnaire comprised fewer and more simplified questions than the standard one and elicited more responses. To help you navigate this report:

- **Total number of respondents is clarified** in each question.
- When the questions referred to **were included in the easy-to-read version**, the total number of respondents is: 2526 citizens, 245 NGO, 114 public authorities, 134 companies, 133 academic institutions, 22 non-EU citizens and 1932 persons with disabilities across categories.

When the questions referred to **were not included in the easy-to-read version**, the total number of respondents is: 1009 citizens, 71 NGO, 33 public authorities, 26 companies, 23 academic institutions, 22 non-EU citizens and 772 persons with disabilities across categories (respondents from the standard questionnaire + accessible word docs.)

Users and Representative organisations

Problems

The majority (75% EU citizens, 73% Persons with disabilities, 77% NGO, 68% non-EU citizens) of respondents claimed that the **lack of mutual recognition of disability status in the EU** represents an obstacle for Persons with disabilities to exercise their free movement rights. According to half of representatives from NGOs (38 of 71), Persons with disabilities are discouraged from travelling because their disability status is not recognised.48% Persons with disabilities stated their disability status is not recognised across Member States. 33% Persons with disabilities specified that their disability card is not accepted when they travel across the EU.

Regarding the factors perceived to **highly hinder** the free movement of Persons with disabilities in the EU:

i. **Lack of publicly available information on preferential conditions for Persons with disabilities** (77% EU citizens, 75% of Persons with disabilities, 87% NGO, 82% non-EU citizens)

ii. **Limited provision of preferential conditions offered by certain services to non-residents** (65% EU citizens, 66% Persons with disabilities, 78% NGO, 90% non-EU citizens)

iii. **Different treatment of non-residents with disabilities compared to residents with disabilities** (67% EU citizens, 66% Persons with disabilities, 78% NGO, 73% non-EU citizens)

European Parking Card

The majority of respondents pointed out that the **implementation of the European parking card for Persons with disabilities is significantly hindered** by **(1) Its limited mutual recognition** across the Member States: (65% EU citizens, 62% Persons with disabilities, 70% NGO), and **(2) National differences in terms of conditions attached to the card** (e.g., validity period, conditions for priority parking, etc.): (60% EU citizens, 58% Persons with disabilities, 58% NGO, 59% non-

EU citizens). Specifically, 22%[156] Persons with disabilities highlighted they have problems when they use their European parking card.

EU added value

Almost all respondents that claimed that the EU action is needed to: **(1) Facilitating mutual recognition of disability in the EU** (94% EU citizens, 91% Persons with disabilities, 93% NGO, 90% non-EU citizens); **(2) Facilitating access to those services** offering preferential conditions to Persons with disabilities (93% EU citizens, 91% Persons with disabilities, 86% NGO, 90% non-EU citizens); **(3) Improving the implementation of the European Parking Card** for Persons with disabilities (88% EU citizens, 83% Persons with disabilities, 83% NGO, 82% non-EU citizens).

Policy options

Most respondents think that the European Disability Card should **be binding for all Member States, without the possibility of opting out** (87% EU citizens, 87% Persons with disabilities, 85% NGO, 77% non-EU citizens, 100% consumer organisations[157]). The majority think that the **European Parking Card should be incorporated into the new European Disability Card** (82% EU citizens, 82% Persons with disabilities, 98% NGO[158], 82% non-EU citizens, 88% consumer organisations). Most stated that the European Disability Card should have the **form of both plastic and electronic** (mobile phone application): 68% EU citizens, 69% Persons with disabilities, 98% NGO[159], 68% non-EU citizens, 59% consumer organisations). According to the vast majority of respondents, the **main sectors that should be included** in the European Disability Card are public transport (1821 of 3361), cultural activities (1566 of 3361) and parking (1534 of 3361).

Impacts

The majority (average of 85% and 100% of consumer organisations[160]) think that the introduction of the European Disability Card would have a **strong impact on**:

- **Increasing access to services offering preferential conditions for Persons with disabilities when travelling in the EU (**85% EU citizens, 84% Persons with disabilities, 85% NGO, 91% non-EU citizens).
- **Simplifying mutual recognition of preferential conditions for Persons with disabilities (**85% EU citizens, 84% Persons with disabilities, 90% NGO, 82% non-EU citizens).
- **Increasing the take up of cultural, leisure, sports, and travel services of Persons with disabilities when travelling across the EU (**85% EU citizens, 84% Persons with disabilities, 86% NGO, 91% non-EU citizens).
- **Increasing the opportunity for Persons with disabilities to exercise fully their right of travelling across the EU (**84% EU citizens, 82% Persons with disabilities, 83% NGO, 91% non-EU citizens).

Most respondents (average of 75% and 2 of 3 consumer organisations) think that EDC will also have a strong impact on **(1) increasing the frequency of travel of Persons with disabilities in the**

[156] Not all persons with disabilities replied to this question in the easy-to-read version: 650 out of 1160.
[157] 3 out of 3 consumer organisations (standard questionnaire + word docs). 17 replied to the public consultation.
[158] Not all NGOs replied to this question: 195 out of 245.
[159] Not all NGOs replied to this question: 195 out of 245.
[160] 3 out of 3 consumer organisations (standard questionnaire + word docs). 17 replied to the public consultation.

EU (68% EU citizens, 67% Persons with disabilities, 77% NGO, 91% non-EU citizens); and **(2) increasing the number of Persons with disabilities travelling in the EU (**67% EU citizens, 67% Persons with disabilities, 72% NGO, 86% non-EU citizens).

Overall, respondents think that the introduction of European Disability Card would have **no impact on (1) regulatory charges**, e.g., fees, levies, and taxes, etc. (52% EU citizens, 53% Persons with disabilities, 61% NGO, 46% non-EU citizens, 1 of 3 consumer organisations); and **(2) indirect costs**, e.g., price increases for the general public for services targeted by the card (53% EU citizens, 53% Persons with disabilities, 74% NGO, 41% non-EU citizens, 2 of 3 consumer organisations);

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., on costs related to the delivery of the Card (72% EU citizens, 70% Persons with disabilities, 79% NGO, 69% non-EU citizens, 3 of 3 consumer organisations);
- **Large companies** e.g., on costs related to the provision of preferential conditions to EU tourists with disabilities (71% EU citizens, 70% Persons with disabilities, 65% NGO, 59% non-EU citizens, 2 of 3 consumer organisations).
- **SMEs** e.g., on costs related to the provision of preferential conditions to EU tourists with disabilities (70% EU citizens, 69% Persons with disabilities, 70% NGO, 2 of 3 consumer organisations).
- **Public authorities offering preferential conditions for Persons with disabilities** (68% EU citizens, 66% Persons with disabilities, 72% NGO, 59% non-EU citizens, 2 of 3 consumer organisations).
- **Civil society organisations**, e.g., on costs related to the provision of support in using the Card-to-Card holders with particular needs (34% EU citizens, 33% Persons with disabilities, 31% NGO, 64% non-EU citizens, 1 of 3 consumer organisations).
- **Cultural venues and institutions** (66% EU citizens, 64% Persons with disabilities, 72% NGO, 50% non-EU citizens, 2 of 3 consumer organisations)

Public authorities

Problems

The majority (72%) of respondents claimed that the **lack of mutual recognition of disability status in the EU** represents an obstacle for persons with disabilities to exercise their free movement rights. Regarding the factors perceived to **highly hinder** the free movement of persons with disabilities in the EU: **73%** stated the **lack of publicly available information** on preferential conditions for Persons with disabilities; **60%** stated **different treatment of non-residents with disabilities compared to residents with disabilities;** 58% stated l**imited provision of preferential conditions offered by certain services to non-residents.**

European Parking Card

Half of respondents pointed out that the **implementation of the European parking card for persons with disabilities is significantly hindered** by **(1) Its limited mutual recognition** across the Member States; and **(2) National differences in terms of conditions attached to the card.**

EU added value

The majority of respondents that claimed that the EU action is needed to: **(1) Facilitating mutual recognition of disability in the EU** (82%); **(2) Facilitating access to those services** offering preferential conditions to persons with disabilities (67%); **(3) Improving the implementation of the European Parking Card** for Persons with disabilities (79%).

Policy options

The majority (73%) think that the European Disability Card should **be binding for all Member States, without the possibility of opting out.** 69% think that the **European Parking Card should be incorporated into the new European Disability Card.** Most (71%) stated that the European Disability Card should have the **form of both plastic and electronic** (mobile phone application).

Impacts

Most respondents (almost 70%) think that the introduction of the European Disability Card would have a **strong impact on**:

- **Increasing access to services offering preferential conditions for Persons with disabilities when travelling in the EU (**61%).
- **Simplifying mutual recognition of preferential conditions for Persons with disabilities (**70%).
- **Increasing the take up of cultural, leisure, sports, and travel services of Persons with disabilities when travelling across the EU (**61%).
- **Increasing the opportunity for Persons with disabilities to exercise fully their right of travelling across the EU (**67%).

Half of respondents think that EC will have a strong impact on **increasing the number of Persons with disabilities travelling in the EU (**52%). Other respondents think that EC will strongly **increase the frequency of travel of Persons with disabilities in the EU (**36%). 64% respondents think that the introduction of European Disability Card would have **no impact on (1) regulatory charges**, e.g., fees, levies, and taxes, etc.; and **(2) indirect costs**, e.g., price increases for the general public for services targeted by the card.

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., on costs related to the delivery of the Card (57%).
- **Large companies** e.g., on costs related to the provision of preferential conditions to EU tourists with disabilities (76%).
- **SMEs** e.g., on costs related to the provision of preferential conditions to EU tourists with disabilities (76%).
- **Public authorities offering preferential conditions for Persons with disabilities** (57%).
- **Civil society organisations**, e.g., on costs related to the provision of support in using the Card-to-Card holders with particular needs (45%).
- **Cultural venues and institutions** (73%)

Service providers

Problems

65% companies claimed that the **lack of mutual recognition of disability status in the EU** represents an obstacle for persons with disabilities to exercise their free movement rights.

EU added value

More than half of respondents that claimed that the EU action is needed to: **(1) Facilitating mutual recognition of disability in the EU** (65%); **(2) Facilitating access to those services** offering preferential conditions to persons with disabilities (58%); **(3) Improving the implementation of the**

European Parking Card for Persons with disabilities (62%).

Policy options

The majority (73%) think that the European Disability Card should **be binding for all Member States, without the possibility of opting out.** 68%[161] think that the **European Parking Card should be incorporated into the new European Disability Card.** Most (88%) stated that the European Disability Card should have the **form of both plastic and electronic** (mobile phone application).

Impacts

More than half of the respondents think that the introduction of the European Disability Card would have a **strong impact on**:

- **Increasing access to services offering preferential conditions for Persons with disabilities when travelling in the EU (**58%).
- **Simplifying mutual recognition of preferential conditions for Persons with disabilities (**62%).
- **Increasing the take up of cultural, leisure, sports, and travel services of Persons with disabilities when travelling across the EU (**54%).
- **Increasing the opportunity for Persons with disabilities to exercise fully their right of travelling across the EU (**69%).

Half of respondents think that EDC will strongly **increase the frequency of travel of Persons with disabilities in the EU,** and **the number of Persons with disabilities travelling in the EU.** Several respondents think that the introduction of European Disability Card would have **no impact on (1) regulatory charges**, e.g., fees, levies, and taxes, etc. (54%); and **(2) indirect costs**, e.g., price increases for the general public for services targeted by the card (69%)

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:

[161] Not all companies replied to this question: 112 out of 134.

- **Member States' public administrations,** e.g., on costs related to the delivery of the Card (69%).
- **Large companies** e.g., on costs related to the provision of preferential conditions to EU tourists with disabilities (77%).
- **SMEs** e.g., on costs related to the provision of preferential conditions to EU tourists with disabilities (77%).
- **Public authorities offering preferential conditions for Persons with disabilities** (62%).
- **Civil society organisations**, e.g., on costs related to the provision of support in using the Card-to-Card holders with particular needs (35%).
- **Cultural venues and institutions** (69%)

Academic and research institutions

Problems

The majority (78%) of respondents claimed that the **lack of mutual recognition of disability status in the EU** represents an obstacle for Persons with disabilities to exercise their free movement rights.

Regarding the factors perceived to **highly hinder** the free movement of Persons with disabilities in the EU:

i. **Lack of publicly available information on preferential conditions for Persons with disabilities** (74%)
ii. **Different treatment of non-residents with disabilities compared to residents with disabilities** (70%)
iii. **Limited provision of preferential conditions offered by certain services to non-residents** (70%)

European Parking Card

The majority of respondents pointed out that the **implementation of the European parking card for Persons with disabilities is significantly hindered** by **its limited mutual recognition** across the Member States (70%).

EU added value

Almost all respondents that claimed that the EU action is needed to: **(1) Facilitating mutual recognition of disability in the EU** (91%); **(2) Facilitating access to those services** offering preferential conditions to Persons with disabilities (96%); **(3) Improving the implementation of the European Parking Card** for Persons with disabilities (83%).

Policy options

Most respondents think that the European Disability Card should **be binding for all Member States, without the possibility of opting out** (87%), that the **European Parking Card should be incorporated into the new European Disability Card** (85%) and that the European Disability Card should have the **form of both plastic and electronic** (70%).

Impacts

Most respondents think that the introduction of the European Disability Card would have a **strong impact on**:

- **Increasing access to services offering preferential conditions for Persons with disabilities when travelling in the EU (**74%).
- **Simplifying mutual recognition of preferential conditions for Persons with disabilities (**83%).
- **Increasing the take up of cultural, leisure, sports, and travel services of Persons with disabilities when travelling across the EU (**65%).
- **Increasing the opportunity for Persons with disabilities to exercise fully their right of travelling across the EU (**78%).

Half of respondents think that EDC will also have a strong impact on **(1) increasing the frequency of travel of Persons with disabilities in the EU**; and **(2) increasing the number of Persons with disabilities travelling in the EU.** Almost 60% of respondents think that the introduction of European Disability Card would have **no impact on (1) regulatory charges**, e.g., fees, levies, and taxes, etc.; and **(2) indirect costs**, e.g., price increases for the general public for services targeted by the card.

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., on costs related to the delivery of the Card (70%)
- **Large companies** e.g., on costs related to the provision of preferential conditions to EU tourists with disabilities (70%)
- **SMEs** e.g., on costs related to the provision of preferential conditions to EU tourists with disabilities (70%)
- **Public authorities offering preferential conditions for Persons with disabilities** (65%).
- **Civil society organisations**, e.g., on costs related to the provision of support in using the Card-to-Card holders with particular needs (44%).
- **Cultural venues and institutions** (78%)

Trade unions

EU added value

All respondents (4 of 4[162]) claimed that the EU action is needed to: **(1) Facilitating mutual recognition of disability in the EU**; **(2) Facilitating access to those services** offering preferential conditions to Persons with disabilities; and **(3) Improving the implementation of the European Parking Card** for Persons with disabilities.

Policy options

[162] 4 out of 4 trade unions (standard questionnaire + word docs). 21 replied to the public consultation.

67% of respondents think that the **European Parking Card should be incorporated into the new European Disability Card.** 62% think that the European Disability Card should have the **form of both plastic and electronic**.

Impacts

All respondents (4 of 4[163]) think that the introduction of the European Disability Card would have a **strong impact on**: **(1) Increasing access to services** offering preferential conditions for Persons with disabilities when travelling in the EU; **(2) Simplifying mutual recognition** of preferential conditions for Persons with disabilities; **(3) Increasing the take up of cultural, leisure, sports, and travel services** of Persons with disabilities when travelling across the EU; **(4) Increasing the opportunity for Persons with disabilities to exercise fully their right of travelling across the EU**.

Half of respondents (2 of 4)[164] think that EDC will also have a strong impact on **increasing the frequency of travel of Persons with disabilities in the EU**. 3 of 4 respondents that will strongly **increase the number of Persons with disabilities travelling in the EU.** 3 of 4 respondents think that the introduction of European Disability Card would have **no impact on regulatory charges**, e.g., fees, levies, and taxes, etc. Half of respondents that it will have no impact on **indirect costs**, e.g., price increases for the general public for services targeted by the card.

Half of respondents (2 of 4) think that the costs entailed by the European Disability Card **would affect the following stakeholders** only from a small to a medium extent to **Member States' public administrations,** (e.g., on costs related to the delivery of the Card; **Large companies** e.g., on costs related to the provision of preferential conditions to EU tourists with disabilities; **SMEs** e.g., on costs related to the provision of preferential conditions to EU tourists with disabilities; and **Public authorities offering preferential conditions for Persons with disabilities.** 1 of 4 respondents think that it will only affect from a small to a medium extent to **Civil society organisations**, e.g., on costs related to the provision of support in using the Card-to-Card holders with particular needs; and **Cultural venues and institutions.**

Main conclusions

Problems

The majority of academic institutions (78%), NGOs (77%), users[165] and public authorities (72% both) agreed that the **lack of mutual recognition of disability status in the EU** represents an obstacle for Persons with disabilities to exercise their free movement rights. Only service providers (65%) and non-EU citizens (68%) agreed a bit below the average.

Users and NGOs agreed the most that the factors perceived to highly hinder the free movement of Persons with disabilities in the EU are: **(1) Lack of publicly available information** on preferential conditions for Persons with disabilities (87% NGOs, 78% users); **(2) Limited provision of preferential conditions** (78% NGOs, 74% users) offered by certain services to non-residents; and

[163] 4 out of 4 trade unions (standard questionnaire + word docs). 21 replied to the public consultation.
[164] 2 out of 4 trade unions (standard questionnaire + word docs). 21 replied to the public consultation.
[165] The category 'users' include: PwDs, EU citizens and non-citizens.

(3) Different treatment of non-residents with disabilities compared to residents with disabilities (78% NGOs, 69% users). Academic/research institutions agreed in a 71%, and public authorities in a 64%.

European Parking Card

Most users, CSOs and academic institutions (63%) pointed out that the implementation of the European parking card for Persons with disabilities is significantly hindered by **(1) Its limited mutual recognition** across the Member States; and **(2) National differences in terms of conditions attached to the card** (e.g., validity period, conditions for priority parking, etc.). Half of public authorities agreed with this.

EU added value

Almost all users, CSOs and academic institutions agreed that the EU action is needed to: **(1) Facilitating mutual recognition of disability in the EU** (92%); **(2) Facilitating access to those services** offering preferential conditions to Persons with disabilities (91%); **(3) Improving the implementation of the European Parking Card** for Persons with disabilities (84%).

The majority of public authorities (82%) agreed that the EU action is needed to facilitate mutual recognition of disability in the EU; most of them (79%) that is needed for improving the implementation of the European Parking Card; and 67% agreed that is needed for facilitating access to those services offering preferential conditions to Persons with disabilities.

63% of service providers agreed that the EU action is needed for those three actions; specially for facilitating mutual recognition of disability (65%); for improving the implementation of the European Parking Card (62%); and facilitating access to those services offering preferential conditions (58%).

Policy options

All consumer organisations[166], and most of users, CSOs and academic institutions (87%) think that the EDC should **be binding for all Member States, without the possibility of opting out**. Public authorities and service providers agreed in a 73%.

98% of NGOs, 88% consumer organisations and 82% of users think that the **European Parking Card should be incorporated into the new European Disability Card**. Public authorities and service providers agreed in a 68%.

98% NGO[167], 88% service providers and 71% public authorities stated that the European Disability Card should have the **form of both plastic and electronic** (mobile phone application). Users agreed in a 68%.

According to the vast majority of respondents, the **main sectors that should be included** in the European Disability Card are public transport (18021 of 3361), cultural activities (1566 of 3361) and parking (1534 of 3361).

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[166] 3 out of 3 consumer organisations (standard questionnaire + word docs). 17 replied to the public consultation.
[167] Not all NGOs replied to this question: 195 out of 245.

Impacts

The majority of stakeholders agreed that the introduction of EDC would have the strongest impact on **simplifying mutual recognition of preferential conditions for Persons with disabilities** (85% users and NGOs; 83 academic institutions; 70% public authorities.)

Service providers think that the strongest impact will be for **increasing the opportunity for Persons with disabilities to exercise fully their right of travelling across the EU** (69%). Users and NGOs agreed in an 85%. For academic institutions (78%), and public authorities (67%) this would be the 2nd strongest impact.

For users and NGOs (86%) the 2nd strongest impact would be in the **increasing the take up of cultural, leisure, sports, and travel services of Persons with disabilities when travelling across the EU.** Academic institutions agreed in an 65%; Public authorities in an 61% and service providers in an 54%.

For users and NGOs (85%) and academic institutions (74%) EDC will as well strongly **increase access to services offering preferential conditions for Persons with disabilities when travelling in the EU.** Public authorities agreed in a 61%; service providers in a 58%.

75% of users and NGOs think that EDC will also have a strong impact on **(1) increasing the frequency of travel of Persons with disabilities in the EU**; and **(2) increasing the number of Persons with disabilities travelling in the EU.** Half of public authorities and service providers agreed with the impact on the frequency of travel, but only 36% of public authorities agreed with the increasing of number of Persons with disabilities travelling.

Overall, respondents think that the introduction of EDC would have **no impact on (1) regulatory charges**, e.g., fees, levies, and taxes, etc. (77% NGOs, 64% public authorities; 61% service providers; 53% users); and **(2) indirect costs**, e.g., price increases for the general public for services targeted by the card (74% NGOs, 64% public authorities, 69% service providers; 53% users).

Most respondents think that the costs entailed by the European Disability Card **would affect**, only from a small to a medium extent, to **SMEs** (72%), **large companies** (71%), **Cultural venues and institutions** (70%), **Member States' public administrations** (69%), **Public authorities offering preferential conditions for Persons with disabilities** (64%) and NGOs (40%).

Public authorities (76%) and service providers (77%) agreed that SMEs and large companies will be the most affected, but only from a small to a medium extent. NGOs (79%) and users (70%) think that it will be the Member States's public administrations. Academic institutions (78%) think that it will be the cultural venues and institutions.

PUBLIC CONSULTATION (by area of questions)

Problems

The majority of respondents claimed that the **lack of mutual recognition of disability status in the EU** represents an obstacle for persons with disabilities to exercise their free movement rights (754 of 1009 EU citizens, 55 of 71 NGOs, 24 of 33 public authorities, 17 of 26 companies, 18 of 23

academic/research institutions, 15 of 22 non-EU citizens, and 559 of 772 persons with disabilities across all categories).

354 of 772 persons with disabilities stated their disability status is not recognised across Member States. Moreover, 377 of 1160 specified that their disability card is not accepted when they travel across the EU.

In particular, the following factors were mentioned as being perceived to **highly hinder** the free movement of persons with disabilities in the EU:

iv. **Lack of publicly available information on preferential conditions for persons with disabilities** (593 of 772 Persons with disabilities across all categories)[168]
v. **Different treatment of non-residents with disabilities compared to residents with disabilities** (510 of 772 Persons with disabilities across all categories)[169].
vi. **Limited provision of preferential conditions offered by certain services to non-residents** (505 of 772 Persons with disabilities across all categories)[170]

Moreover, according to half of representatives from NGOs (38 of 71), **persons with disabilities are discouraged from travelling because their disability status is not recognised.**

European Parking Card

The majority of respondents (the share is lower for public authorities) pointed out that the **implementation of the European parking card for persons with disabilities is significantly hindered** by:

- Its **limited mutual recognition** across the Member States: (482 of 772 Persons with disabilities responding across all categories)[171]:
- **National differences in terms of conditions attached to the card** (e.g., validity period, conditions for priority parking, etc.): (453 of 772 Persons with disabilities across all categories)[172].

Specifically, 140 of 650[173] persons with disabilities highlighted they have problems when they use their European parking card.

The necessity and added value of a possible EU action

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[168] PC problem (i) Lack of information. Detailed replies: 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.
[169] PC problem (ii) Different treatment. Detailed replies: 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,
[170] PC problem (iii) Limited preferential conditions. Replies: 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.
[171] European parking card problem. Limited mutual recognition. Detailed replies: 665 of 1009 EU citizens, 50 of 71 NGOs, 15 of 33 public authorities, 16 of 23 academic/research institutions.
[172] European parking card problem. National differences. Detailed replies: 609 of 1009 EU citizens, 44 of 71 NGOs, 15 of 33 public authorities, 13 non-EU citizens, 2 consumer organisations.
[173] Not all persons with disabilities replied to this question in the easy-to-read version: 650 out of 1160.

The majority of respondents claimed that EU action is needed for:

- **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 772 Persons with disabilities across all categories.
- **Facilitating access to those services offering preferential conditions to persons with disabilities:** 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 772 Persons with disabilities across all categories.
- **Improving the implementation of the European Parking Card for persons with disabilities:** 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 772 Persons with disabilities across all categories..

Policy options

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 persons with disabilities across all categories;

Also, most respondents think that the **European Parking Card should be incorporated into the new European Disability Card**: 2083 of 2526 EU citizens, 192 of 195[174] NGOs, 78 of 114 public authorities, 107 of 112[175] 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 1932 persons with disabilities across all categories.

The majority stated that the European Disability Card should have the **form of both plastic and electronic** (mobile phone application) card: 1724 of 2526 EU citizens, 191 of 195[176] NGOs, 81 of 114 public authorities, 99 of 112[177] 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 1932 Persons with disabilities across all categories. .

According to the vast majority of respondents, the **main sectors that should be included** in the European Disability Card are public transport (18021 of 3361), cultural activities (1566 of 3361) and parking (1534 of 3361).

Impacts

[174] Not all NGOs replied to this question: 195 out of 245
[175] Not all companies replied to this question: 112 out of 134
[176] Not all NGOs replied to this question: 195 out of 245
[177] Not all companies replied to this question: 112 out of 134

Overall, respondents think that the introduction of the European Disability Card would have a **strong impact on**:

- **Increasing access to services offering preferential conditions for persons with disabilities 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 772 persons with disabilities across all categories).
- **Simplifying mutual recognition of preferential conditions for persons with disabilities** (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 772persons with disabilities across all categories).
- **Increasing the take up of cultural, leisure, sports, and travel services of persons with disabilities 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 772persons with disabilities across all categories).
- **Increasing the opportunity for persons with disabilities 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 772 persons with disabilities across all categories).
- **Increasing the frequency of travel of persons with disabilities 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 772 persons with disabilities across all categories); and
- **Increasing the number of persons with disabilities 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 772 persons with disabilities across all categories).

Overall, respondents think that the introduction of European Disability Card would have **no impact on (1) 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 772 persons with disabilities), and **(2) 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 772 persons with disabilities across all categories).

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., on 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 772 persons with disabilities across all categories).
- **Large companies** e.g., on 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 772 persons with disabilities across all categories).
- **SMEs** e.g., on 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 772 persons with disabilities across all categories, respectively).
- **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 772 persons with disabilities across all categories).
- **Civil society organisations**, e.g., on 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 772 persons with disabilities 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 772 persons with disabilities across all categories).

STRATEGIC INTERVIEWS

The key concerns discussed during the strategic interviews were:

- **Identifying the EU legal basis to justify the EDC:** in particular, whether it should be based either on Article 21 of the Treaty on the Functioning of the European Union (TFEU)[178] on the right of EU citizens to move and reside freely within the EU territory or on Article 56 TFEU on

[178] Consolidated version of the Treaty on the Functioning of the European Union. Available at: link.

the freedom to provide services within the EU (in case of services for remuneration). For that, the envisaged EU intervention should be supported by
    - evidence of the problems faced by persons with disabilities, 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.
- **Addressing extra cost and concerns for transport service providers:** The application of EDC to access preferential conditions in the transport sector for persons with disabilities, might produce concerns and costs for transport service providers when they are requested to extend preferential conditions also to non-nationals with disabilities. These costs and concerns need to be carefully considered.
- **Tackle fraud at local level when using European parking card for persons with disabilities,** 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.

TARGETED INTERVIEWS

Problems

The target interviews provided consistency to the results compiled with the larger consultation activities planned (call for evidence and public consultation). In this sense, again, the **lack of mutual recognition of national disability cards** and related consequences are the main concern for 3 of 3 EU bodies, two of 3 EU CSOs and one academic expert. Among them, one EU body and one EU CSO highlighted that **persons with disabilities are discouraged to travel** 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. Then, one of 3 EU body and one academic expert stated that limited access to services offering preferential conditions for non-residents with disabilities **de facto represents an obstacle to the exercise of their free movemen**t rights and the right to receive services in the EU.

Moreover, in consistence with the strategic interviews, one of two EU Parking association claimed that the problem of **frauds and forgeries of the European parking card** have a strong impact on the right of persons with disabilities to easily access different premises, as persons using fake European parking card take away the spaces reserved for persons with disabilities. Moreover, the **lack of cross-national database on parking cards' design or on parking cards' holders** prevents a proper monitoring, as enforcers in charge of checking the validity of the European parking card are not always aware of how a real European parking card looks like. **The progress of technology exposes the European parking cards to more and more sophisticated frauds and forgeries**. Hence, the current paper format needs an update.

The necessity and added value of a possible EU action

The majority of stakeholders' (three of three EU bodies, two of three EU CSOs and one academic expert) 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). Moreover, the two EU parking associations agreed on updating the parking card with **digital components** is a key aspect of the initiative, and an area where the EU can bring added value with very concrete solutions.

Policy options

In terms of policy options for the EDC, there was **less support,** comparing when consulting to persons with disabilities, **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.

On the European parking card, there was a call **not to merge the EDC with the European parking card** by interviewees from the EU CSOs and disability expert. In addition, the importance of a **fraud-proof European parking card and a database solution** that would link vehicle to a European parking card was highlighted by the disability expert, and one interviewee from the EU CSOs and from the EU body.

ONLINE SURVEYS

Problems

20 out of 24 Persons with disabilities and 10 of 25 NCAs stated that the proof of disability is normally needed to get access to preferential conditions. According to 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 persons with disabilities to exercise their free movement rights and to access preferential conditions when using certain services abroad.

When preferential conditions are not offered, the costs of travelling sustained by persons with disability increase to a large extent (19 NCAs, 14 national CSOs, 11 persons with disabilities, 9 EU-level CSOs, and 3 other relevant public authorities).

As concerns the **European parking card,** some NCAs (13), persons with disabilities (11). national CSOs (9), EU-level CSOs (6), and other public authorities (2) consider that the correct implementation of the European 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 majority of respondents (22 NCAs, 22 national CSOs, 21 persons with disabilities, 10 EU-level CSOs and 3 other relevant public authorities) 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 persons with disabilities in all the Member States (23 NCAs, 21 national CSOs, 22 persons with disabilities, 9 EU-level CSOs).
- Ensure that persons with disabilities are offered the **same preferential conditions as residents of the country to which they travel to** (22 NCAs, 22 national CSOs, 20 persons with disabilities, 10 EU-level CSOs and 3 other relevant public authorities).

- **Improve the implementation of the European parking card** for persons with disabilities (22 persons with disabilities, 21 NCAs, 21 national CSOs, 8 EU-level CSOs and 4 other relevant public authorities).

Policy options

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

- The EDC should have both an **electronic and a plastic format** (17 national CSOs, 16 NCAs, 12 persons with disabilities, eight EU-level CSOs and four other relevant public authorities).
- The holders of a national disability card or certificate should be **automatically entitled to the EDC** (23 national CSOs, 22 persons with disabilities and 22 NCAs).
- **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, 21 national CSOs, 10 EU-level CSOs and 4 other relevant public authorities).
- **A common EU platform** where users can get information on the preferential conditions and services offered in each Member State (22 persons with disabilities, 22 NCAs, 22 national CSOs and 4 other relevant public authorities).
- **An EU-wide awareness-raising campaign** to inform relevant stakeholders about the card, its features, and benefits (22 national CSOs, 21 NCAs, 10 EU-level CSOs and 4 other relevant public authorities).

The majority of **persons with disabilities and national CSOs** (15 out of 24 persons with disabilities, 15 out of 23 national CSOs) **believe that the** eligibility criteria to receive the European parking card and the EDC should be the same. As to the merging of the European parking card with the new EDC, 16 **persons with disabilities think that the two cards shall be merged, whilst** 11 NCAs and 3 EU-level CSOs representatives believe that the two cards shall be kept separate.

Impacts

The majority of respondents believe that the **EDC would facilitate (i) the exercise of free movement** (22 NCAs, 21 national CSOs and 4 other relevant public authorities); **(ii) the right to receive preferential conditions** when accessing certain services (23 NCAs, 21 national CSOs and 4 other relevant public authorities).

Indeed, it is expected that the **EDC would increase: (i) the number of persons with disabilities travelling in the EU** and **(ii) the frequency of travelling** (21 NCAs, 21 national CSOs, 4 EU-level CSOs and 4 other relevant public authorities); **(iii) the length of staying abroad** (22 national CSOs, 15 NCAs, 3 EU-level CSOs and 3 other relevant public authorities,); **(iv) the number of persons with disabilities using certain services** when travelling to other Member States (20 NCAs, 18 national CSOs 3 EU-level CSOs and 3 other relevant public authorities,); **(v) the take up by persons with disabilities of cultural, leisure, sports, and travel services** (23 NCAs, 22 national CSOs, 9 EU-level CSOs and 4 other relevant public authorities).

As concerns the cost entailed by the EDC, most service providers (7) highlighted that the introduction of the **EDC will not bring significant change in the costs** related to recruiting additional or specialised staff; or keeping track of the number of customers with disabilities accessing preferential conditions with the EDC (8 service providers). 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 persons with disabilities 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 European 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 **(i) forgeries** (19 national CSOs, 16 NCAs, 7 EU-level CSOs and 2 other PAs) and **(ii) frauds** (15 national CSOs, 13 NCAs, 6 EU-level CSOs and 3 other PAs).

In terms of the efficiency of the European parking cards, although some NCAs and other public authorities claim that the European parking card entails costs for national authorities in charge of managing and issuing the card in the Member States (11 of 25 NCAs and 3 of 5 PA)[179] the majority of respondents believes that **the benefits linked with the adoption of the European 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 European 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 (9 NCAs).
- **A decrease in costs related to the issuance of the Card** e.g., managing application procedures, producing the cards, delivering the cards (11 NCAs and 5 other relevant public authorities).
- **A decrease in costs related to the monitoring** (e.g., keep track of the number of cards issued) (9 NCAs) **and reporting** (e.g., storing information concerning the card use) **its implementation** (7 NCAs).
- **A decrease in enforcement costs** e.g., inspections, handling complaints, forgery controls (4 other relevant public authorities).

WORKSHOPS

Problems

Participants in the workshop (seven of 11 CSOs and 17 of 19 NCAs representatives 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 in the case of invisible disabilities (one CSO). Importantly, six national service providers 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.

[179] 11 out of 25 NCAs replying to Q3.11, 3 out of 5 other PAs replying to Q3.11.

Seven out of eight CSOs and 12 out of 20 NCAs representatives think that **persons with disabilities are discouraged from travelling abroad** as a consequence of the **limited recognition of the national disability cards or certificates across the Member States**.[180] Likewise, they think that **persons with disabilities 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 European parking card hinder its mutual recognition** across the Member States. Due to the limited recognition of their European parking card abroad, **persons with disabilities feel discouraged from travelling abroad (five out of six CSO and 17 out of 20 NCAS)**.

Policy options

Participants in the workshops stated that **the EDC should include common security features**, which would prevent fraudulent use of the card (3 of 11 CSO and 1 of 29 NCA). As for the **format**, the majority of participants in the workshops argued that **the EDC should be available both in digital (including a QR Code) and physical (i.e., plastic) format**. [181]

Participants (8 of 11 CSO and 3 of 29 NCAs) 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, 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 (1 of 11 CSO and 1 of 29 NCA). Moreover, the uptake and use of the EDC should be supported by an **EU-wide awareness-raising campaign**, (6 NCAs and three CSO) as well as by an **EU-wide control system/authority** in charge of monitoring and coordinating the EDC implementation across the Member States (6 of 29 NCAs and 4 of 11 CSO).

Finally, as concerns the **European parking card,** six out of seven CSOs and six out of 11 NCAs representatives participants in the workshops 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

Participants in the three workshops 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 (10 of 29 NCAs and 4 of 11 CSO). Indeed, participants 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 persons with disabilities in the EU (16 of 16 NCA and 7 of 7 CSO). Overall impacts would be even greater in case the **mandatory provision of preferential**

[180] Seven out of eight CSOs replying to Q5 and 12 out of 20 NCAs replying to Q3; Seven out of nine representatives of CSOs replying to Q2.
[181] One CSO representative; Two CSOs representatives and two NCAs representatives.

conditions is extended to personal assistants of persons with disabilities.[182] Also, four of 20 service providers 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 NCAs representatives (29 of 29) and most of CSO (8 of 11) think that **the European parking card should not be merged with the new EDC**. In this regard, participants argued that having just one card, would be complicated. 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 (3 of 11 CSO and 1 of 29 NCA). Another argument against merging the two cards is the difference in eligibility criteria (3 of 11 CSO and 1 of 29 NCA), 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, 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 (1 of 29 NCA).

FOCUS GROUPS

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 persons with disabilities to services.

According to 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 persons with disabilities 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

Problems

Interviewees pointed out that, at national level, **misuses of the European parking card** still happen regularly, in particular frauds and forgeries. Moreover, at **local/regional level**, there are **different parking and traffic rights granted to cardholders**, and lack of information about these different conditions, which often results in fines received by persons with disabilities assuming they could use their card as they do in their municipality/region. Indeed, according to CSOs, 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

[182] Seven out of eight CSOs representatives replying to Q8 and 15 out of 16 NCAs representatives replying to Q6.

Some **recommendations to improve the use of the European parking card** were provided, among which:

- **Improving the parking card model with digital features** (e.g., hologram, QR code) to address the fraud and forgery and to allow the recognition by the car plates scan or at the park meter.
- **Establishing national databases of parking card holders** 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 users can find the rights associated with their parking card in each Member State.

Finally, there was **unanimity in the fact that EDC should not be merged with the EU parking card**, as the scope of the two instruments is too diverse. Only one parking association representative interviewed was in favour of merging them if a common database of card holders will be accessible for parking rights controllers.

SUMMARY OVERVIEW OF RESULTS FOR KEY IA ELEMENTS

PROBLEMS

The European Commission bases its initiative on two problems **(i) lack of mutual recognition** of disability status as depriving persons with disabilities of an important facilitation of free movement and concerning **(ii) the fraudulent actions in the use of the European parking card.**

There was clear consensus amongst all stakeholders (i.e Persons with disabilities, EU level stakeholders, national authorities, CSOs, service providers) consulted trough 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.

Consulted stakeholders across stakeholders' groups **largely agree on a discouragement from travel** due to the lack of access to preferential conditions for services and thus an **increase of costs for travelling for persons with disabilities**. In addition, through the Call for evidence, and later reaffirmed in the targeted interviews and the workshop, the **lack of information on the preferential conditions available** in the host country was identified as well as an obstacle for travelling of persons with disabilities, as they feel discouraged because of the uncertainty.

The focus group further identified significant administrative burdens related to **assessment of the validity of the different national disability cards**. In that sense, participating **service providers were very positive about the introduction of EDC**, stating that it would eliminate these administrative barriers and would increase access of persons with disabilities to services.

Regarding the European Parking Card, consulted stakeholders across all categories largely agreed that the current situation where **different formats, designs and rules** are provided for its implementation of at national, regional, and local level, **hinder mutual recognition and increase the risk for fraudulent actions**. The lack of a cross-national database causes that enforcers in charge of checking the validity of the European parking card are not always aware of how a real European parking card looks like. The public consultation and the online surveys additionally show that the **differences in the validity period of the** European **parking cards** also create concerns about the mutual recognition of the cards.

THE NECESSITY AND ADDED VALUE OF A POSSIBLE EU ACTION

The perception of the **need for EU action and the EU added value** was positive overall among the range of stakeholders consulted on both the implementation of EDC and the European Parking Card. Particularly, respondents to the online survey from all the consulted categories (i.e. Persons with disabilities, 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.

In that sense stakeholders across all consultation activities consider that **EDC will facilitate the mutual recognition of disability status** among EU Member States. In addition, through most of the consultation activities (public consultation, online surveys, targeted interviews, and focus group) the action at the EU level is likely to contribute to **facilitating the access to services offering preferential conditions to persons with disabilities**.

There was clear consensus amongst all stakeholders consulted (i.e., persons with disabilities, EU-level stakeholders, NCAs and other public authorities, EU-level and national CSOs, companies/business associations and trade unions) that the key added value of action at EU level would be **improving the implementation of the** European **Parking card** for persons with disabilities.

POLICY OPTIONS

The majority of consulted stakeholders support a **binding legal instrument** for the European Disability Card. Especially participants of the public consultation suggested **no option for opting out**. In addition, during the online survey, Persons with Disabilities, CSOs, and NCAs identified, that the holders of a national disability card or certificate should be **automatically entitled to the EDC**. However, there was a less positive view by the targeted interviews on the binding character of the EDC, while **service providers could choose** the type of preferential conditions to offer.

The online survey, the workshops and the case studies identified the need of including **specific security features** on the card to prevent its fraudulent use. Furthermore, there is an overall consensus through stakeholders (evidenced in the call for evidence, online surveys, and workshops) that a **digital and physical format** of the card is needed.

There was a wide consensus by national and EU-Level CSOs, NCAs, and other relevant public authorities on accompanying measures such as an (**i) awareness raising campaign, (ii) an EU platform with info of preferential conditions and** services offered in each Member State. Some NCAs and CSOs supported an **EU-wide control system/authority** to monitor the EDC implementation.

Finally, there is a clear dichotomy on merging the European parking card with the new EDC. On one side, there is an overall consensus across 'institutional' stakeholders (all case studies, EU-level CSOs, NCAs) that **the** European **parking card should not be merged with the new EDC**. However, the majority of respondents, from all stakeholder categories to the public consultation, as the tool showing the most the interests of EU-citizens with disabilities, agreed that the **European parking card should be incorporated into the new EDC.**

IMPACTS

First, there is a clear consensus among stakeholders consulted through the different consultation activities on welcoming the EDC initiative, emphasising that the adoption of a mutually recognised EDC will facilitate **(i) the freedom of movement** for persons with disabilities in the EU and **(ii) the right to receive preferential conditions when accessing certain services. Moreover, stakeholders agreed (specially EU citizens, NCA and CSO through the public consultation and the online surveys)** that EDC would increase: **(iii) the number of persons with disabilities travelling** in the EU and those using certain services; **(iv) the frequency and length** of staying abroad; (**v) and the take up by persons with disabilities of cultural, leisure, sports, and travel services**.

On the other side, a key concern identified is related with the **costs incurred** by the implementation of the EDC. Overall, the majority of service providers stated that **the cost of offering preferential conditions** to persons with disabilities would be relatively low. As well, **all respondents** of the online surveys **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.

Regarding specific costs, service providers (online surveys) highlighted **(i) cost of training staff;** CSOs (call for evidence) highlighted the **(ii) investments** into infrastructure, technologies, people, and skills; and **(iii) handling of sensitive customers data**; and according to the strategic interviews, special attention should be put on the extra cost for **(iv) service providers on transport**, when they are requested to extend preferential conditions also to non-nationals with disabilities. Overall respondents in the public consultation think that EDC would have **no impact on regulatory charges,** e.g., fees, levies, and taxes, and indirect costs e.g., price increases for the general public for services targeted by the card.In terms of the efficiency of the European **parking cards**, although some NCAs and other public authorities claim that the European parking card entails costs for national authorities in charge of managing and issuing the card the majority of respondents in the online surveys believes that the **benefits linked with the adoption of the** European **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** European **parking card**.

Finally, most respondents of the public consultation agreed that the costs entailed by EDC would affect the following stakeholders by a small to a medium extent: (1) Member States' public administrations and public authorities offering preferential conditions for persons with disabilities (17 of 29 public authorities) (2) Large companies and SMEs (19 of 25 companies, 2 of 4 trade unions, 2 of 3 consumer organisations) (3) Civil society organisations (20 of 66 NGOs), and (6) Cultural venues and institutions (50 of 66 NGO, 21 of 29 public authorities, 2 of 3 consumer organisations).

CONSULTATION WITH AND POSITIONS OF MEMBER STATES

Disability Platform and its Sub-group on European Disability Card

The initiative and the state of play of its implementation was presented in each meeting of the Disability Platform in 2022-2023. The Disability Platform is an advisory group of the European Commission in the area of disability, composed by representatives of Member States and civil society.

In addition, the Sub-group on European Disability Card was created and met twice on 20 May 2022 and 15 May 2023, when the state of play was discussed and Member States and civil society could express their opinions on particular issues. It includes 11 Member States (CY, CZ, EL, DK, HU, IT, MT, NL, PL, PT, SI) and four organisations representing persons with disabilities (Autism Europe, European Blind Union, European Disability Forum, European Union of the Deaf).

Since the adoption of the Commission Work programme 2023 in October 2022, the Commission in its presentations and discussions in the meetings below made clear the legislative nature of the initiative.

Positions of Member States

Meeting of the Social Protection Committee in Stockholm on 3 April 2023

The European Disability Card initiative was one point on the agenda:

The Commission presented the building blocks of the forthcoming proposal and the preliminary results of the ongoing consultations **and invited a discussion**, in particular on the potential **scope of the European Disability Card**, its **possible digitalisation**, as well as potential for **integration with the EU parking card.**

In the ensuing discussion, several delegations shared their **positive experience with the pilot project**, launched in 2018. The early involvement of civil society organisations and other stakeholders in the development of the card was pointed out as a key success factor.

All intervening 16 Member States supported the introduction of the card. The majority expressed a **preference for retaining the scope of the Card to the areas already covered by the pilot project (leisure, culture, sport and transport)**. One Member State is in favour of limiting the scope by excluding transport. **Some** indicated a **level of flexibility in expanding the scope to other elements** (services) that enable the inclusion of persons with disabilities, and emphasised a strong preference for **voluntary participation of the service providers**, as well as expressing some **cost-related concerns**. **Several Member States indicated they would not support the expansion of the scope to the provision of benefits** in social security.

There was **consensus** among all of the intervening 16 Member States that the **EU Disability and EU Parking Cards should be kept separate** and that **both physical and digital cards should be issued** to the card beneficiaries, to ensure equal access and limit the impact of the digital gap for certain users. Several Member States emphasise the need for proper oversight to avoid possible abuse, and raised the issue of data protection.

Meeting with Member States organised by Finland on 17 May 2023

On 17 May 2023 Finland, which is taking part in the pilot EU Disability Card and has expressed a strong interest in the initiative, organised a meeting of Member States to discuss the initiative. The meeting conclusions made by Finland highlight that the EDC initiative is warmly welcomed. Recommendations include careful planning of the extension of the services covered, no merger of the parking card for persons with disabilities with the EDC into a single card, and no coverage of social security and healthcare benefits. Member States' positions expressed during the meeting are described in more detailed below.

Position papers of Member States

Seven Member States and one region have so far submitted a position paper (Denmark, Finland, France, Hungary, Italy, Poland, Sweden and Bavaria), all of them supportive of an EU legislative initiative.

Denmark:

- Focus on facilitating access to preferential conditions and discounts for people with disabilities on short-term stays in other Member States, within the areas of culture, leisure, sport and transport.
- No harmonisation or common disability definition at EU level, assessing and granting disability status remains a national competence.
- Well-defined and limited scope that respects national competences and the principle of subsidiarity.
- No inclusion of education, housing, employment, social security and social protection, and benefits and services that require pre-authorisation or demand more thorough assessments of the specific individual's needs.
- Voluntary application for the card by persons with disbailities and service providers should be able to decide freely on the range of preferential conditions and discounts they offer to people with disabilities, including cardholders.
- Format - physical and supplementary digital version. The Commission should develop and make mutually recognised digital version of the card available.
- Separate European Disability and EU parking card.
- Careful consideration to be paid to financial costs and administrative burdens imposed on Member States and businesses. Member States to decide if the card should be free of charge.
- No obligation for public subsidies to cover potential extra costs of businesses.
- Data collection limited to the operation of the EU Disability Card.

Finland:

- An EU-wide Disability Card can positively impact on the equality and inclusion of persons with disabilities when they travel from one Member State to another; on raising awareness of the rights of persons with disabilities, including among service providers
- Scope: transport, culture, leisure and sport.
- The implementation, use and legal coverage of the card and the criteria for issuing it should be defined at national level in line with the piloted model.
- Voluntary application for the card by persons with disabilities.
- National competence – disability assessment and definition.
- To involve persons with disabilities and disability organisations in the development of the Disability Card at all stages.
- Accessibility of the card and of information on the card and on how it can be used in different countries.

- Easy application for the card.
- Format: plastic form and digital application. Digital card to be compatible with other EU-level digital solutions; attention to be paid to protection and the secure processing of data.
- Separate EU parking card and European Disability Card.

France:

- The definition and mutual recognition of disability status is a national competence together with disability assessment
- FR welcome the EDC initiative for
    - Promoting freedom of movement and equal treatment for Persons with disabilities when accessing to culture, leisure, sport and transport.
    - Better reconciliation among national and EU objectives and concretization of EU values promoting equality for vulnerable population
    - Encouraging rights granted at national level, as these would apply to all national and EU citizens
- Since 2017, FR has three types of disability cards: "stationement" (Parking Card), "priorité" (people with less than 80% of disability, with priority access to transport and queues), and "invalidité" (people with minimum of 80% disability, receiving invalidity pension, similar to the "priorité" card with some additional reductions in transports and tax benefits.)
- FR support to have only one card, including the national disability card and the future EDC
    - This card would be issued by Member States or local authorities
    - Common graphic format and security system at EU level
    - That can be used at national and EU level
- Having a EDC different from the national disability card would
    - force Persons with disabilities to make an additional effort to get the EDC
    - reserve the rights of the EDC only to those who had sufficiently anticipated their trip
    - be seen as a regression for Persons with disabilities who can currently use their national card in other Member States
    - make difficult to prohibit the use of the EDC to nationals in their own Member States, thereby making it unnecessary to possess national card which would carry the same rights.
- The European Parking Card must be kept separated from EDC
- The EDC must distinguish two categories of beneficiaries:
    - Persons with disabilities that needs someone accompanying to get around. Then, e.g., in public transport the accompanying person does not have to pay the ticket.
    - Persons with disabilities that can travel alone and then e.g., they cannot be accompanied free of charge
- The future EDC would have to be accompanied by an active and accessible communication to know the rights attached to it.

- The specific conditions for the EDC and the European Parking Card may vary between Member States and withing each State.
    - Beneficiaries must be easily and clearly informed of these differences.
- Both physical and digital EDC must be developed.
- Security to avoid fraud is key. For the physical card, a QR code for the verification of the card is put as a good example (as it happens now with the FR "carte mobilité inclusion") For the digitalisation, an electronic signature can guarantee the identification of the issuing body and the integrity of the data contained.
- The EDC must be easy to use for Persons with disabilities in their daily life.

Hungary:

- The definition and mutual recognition of disability status is a national competence together with disability assessment.
- The card should have a well-defined, clear and limited scope, which should support access to preferential conditions and benefits for persons with disabilities during their short stays in other Member States. The European Disability Card should be adapted to national service structures and systems.
- A single card EU to allow for mutual recognition of the cards.
- To prepare a list of discounts and possible services linked to the card, which would be subject to a decision of the Member States.
- Format - hybrid solution - plastic form and digital application.
- Voluntary application for the card by persons with disabilities.
- Necessary careful consideration to the financial costs and administrative burden imposed on Member States.
- Separate cards - the EU parking card and European Disability Card.

Italy:

- Welcomed a legislative proposal on a European Disability Card.
- Scope: transport, culture, sports, entertainment, and leisure. Each Member State should engage with potential public and private providers, thus allowing to broaden the range of benefits and concessions for the provision of goods and services.
- The criteria for issuing the card to be identified at national level.
- Mutual recognition of the card regardless of the different criteria adopted by each Member State for the issuance of the card.
- Necessary involvement of persons with disabilities and their organisation in the development of the card at all stages.
- Format: plastic and digital. Any digital card should be compatible with other EU-level digital solutions. Particular attention should be given to data protection.
- Separate EU parking card and European Disability Card.

- Accessible, easy, and comprehensive information on the card and on how it can be used in different member states.

Poland:

- No harmonisation of disability status and assessment systems across the EU, national competence to grant disability status should remain;
- Scope of the Card: preferential conditions and discounts in the area of culture, recreation, sport and transport, respecting the regulations in individual EU countries;
- Member State to decide on the scope of rights on its territory, while maintaining the differentiation of rights to discounts and preferential rates at the national and local level;
- The Card should not cover health, employment, education, social security, social protection or housing;
- Two separate cards: the European Disability Card and the EU Parking Card;
- National competence for granting and issuing the Card;
- Format: physical and electronic, a person with a disability could choose a format;
- EU funds should available for issuing and implementing the Card;
- EU and national bodies to coordinate the implementation;
- The transposition period: at least 2 years;
- Indicating the degree of disability on the Card should be considered, as discounts and preferential rates often depend on the degree of disability, especially for transport, to avoid unequal treatment of nationals with moderate or mild disabilities.

Sweden:

- There is currently no specific card for all persons with disabilities in use in Sweden and therefore no official criteria in place on which the issuing of such a card could be based. Given the structure of Sweden's disability policy, persons with disabilities are not registered based on their disability.
- The recognition of disability status is and must be a matter of national competence.
- Adequate room should be left for Member States to adjust the implementation of the initiative to national circumstances.
- The scope of a potential European Disability Card would have to be clear and limited to be effective. This is not least important as the functioning of a card will require mutual recognition of disability status based on national assessments.
- The financial and administrative burden for Member States is kept proportionate to the purpose of the initiative.

Bavaria:

- To respect subsidiarity – disability status can continue to be recognized only at national level (including the issuing of national identity cards/certificates). As the European Commission rightly points out in its invitation to comment on an impact assessment, the concept of

'disability' must not be harmonized at EU level. In addition, according to the European Commission, the scope of a possible EU disability card should not cover social security benefits to which access is governed by national rules and, in a cross-border context, by the regulations on the coordination of social security systems.

- Proportionality – preference for Council recommendation or Directive.
- Facilitating the free movement of persons with disabilities in the EU - could help to further promote the inclusion of persons with disabilities in everyday life; could result to equal benefiting from the same benefits; to increase social acceptance as a uniform EU disability card could be used to prove the existence of a disability. Such a uniform Europe-wide possibility of proving the existence of a disability could be greatly facilitated for persons with obstacles, particularly when carrying out cross-border activities and travelling to other Member States.
- Limitation of the scope to short-term stays of up to three months, particularly for touristic purposes and the scope should be narrowly defined.
- Voluntary granting of advantages by service providers - for the Member States and the providers of services to determine whether favourable treatment and compensation for disadvantages are granted.
- No (indirect) harmonisation of the concept of disability and coverage of social security – but there is a risk for Germany as concerns public transport – free transport falling under social protection.
- Risk of discrimination against nationals because different criteria are used in different Member States and different benefits are assigned to different levels of disability.

ANNEX 3: 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 1 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 1 - 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	
Data collection to monitor the use of EDC	X	
Providing benefits to non-residents with disabilities		x

[1] Type of preferential conditions available to persons with disabilities per each sectors: Data shall be regularly (e.g. on a yearly basis) collected and shared by each service provider. The monitoring exercise shall be mandatory at least for service providers requested by law to offer preferential conditions to persons with disabilities. As for preferential conditions offered on a voluntary basis, service providers may decide whether monitor and share such data.

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 Member States 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. 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 2 – Overview of Benefits (total for all provisions) – Preferred Option A2 and B2

Description	Amount	Comments
Direct benefits		
Improved welfare Increase in individual and societal	Reduction of the travel gap for Persons with	The reduced uncertainty regarding the recognition of disability status and the

welfare Enhanced participation in short term travelsof persons with disabilities	disabilities of between 2.8 and 4.12 percentage points	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[183], based on existing data on persons with disabilities [184] and the evolution of travel patterns in the general population[185]. This will in turn have a positive societal impact through improvements in the culture, social integration and personal development of persons with disabilities.
Improved market efficiency – 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 with disabilities travelling for about 2 months	Cost savings for persons with disabilities currently being denied preferential conditions when travelling to other Member States (or not travelling abroad), estimated at about 44% according to the results of the Public Consultations. These costs savingswere identified through case studies of individual travellers 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 Annex 4.
Improved market efficiency – Cost savings and general reduction in hassle costs for persons with disabilities and service providers	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. .
Improved market efficiency – Improved information on the preferential conditions offered to persons with disabilities	n.a.	Option A2 entails enhanced provision of information to persons with disabilities on the types of preferential conditions offered to them, via as the set up of national websites and the use of awareness raising

[183] See Annex 9, Calculation of the travel gap for a detailed overview of the procedure in cacultating the travel gap
[184] 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.
[185] Eurostat database, tour_dem_toage. Available at: link.

		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		
Wider macroeconomic benefits – Benefits in the market for accessible tourism	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 bllion 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 the estimates range from 2.1 to 3.1 billion EUR. 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[186].
Other non-monetary benefits – Protection of fundamental rights	n.a.	**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

[186] 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.

		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: Study supporting the impact assessment

Table 3 – Overview of costs – Preferred option A2

Description		Amount		Stakeholders	Comment
Activity	Type of cost	One-off	Recurrent		
Production	Direct	n.a.	Between	Administrations	The costs of

Description		Amount		Stakeholders	Comment
Activity	Type of cost	One-off	Recurrent		
and delivery of EDCs	adjustment costs		EUR 1 and EUR 5 per Card. Cost are likely to decrease as production is scaled up		production and delivery can be estimated based on those incurred by Member States participating in the pilot project.[187] 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	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

[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. 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.

Description		Amount		Stakeholders	Comment
Activity	Type of cost	One-off	Recurrent		
			116 and 161 million EUR, accounting for only 0.05% to 0.08% of the turnover of (non-air) passenger transport		disabilities from other Member States represent a very small portion of their client base[188] 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 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.
					Collecting information on service providers and number of cards.

[188] Study supporting the impact assessment based on 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).

Description		Amount		Stakeholders	Comment
Activity	Type of cost	One-off	Recurrent		
					Costs of providing information to service providers.

Source: Study supporting the impact assessment

Summary of costs and benefits of policy option B2

Table 4 – Overview of Benefits (total for all provisions) – Preferred Option B2

Description	Amount	Comments
Direct benefits		
Improved welfare – Increase in societal welfare due to enhanced participation in tourism of persons with disabilities	Reduction of travel gap for Persons with disabilities 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.
Improved market efficiency – Cost savings for persons with disabilities travelling	Starting from 4 EUR per day [189]	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

[189] 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.

		number at about EUR 3 per hour.
Improved market efficiency – Improved information on the parking rights of cardholders	Savings can be quantified as generally below EUR 300 in terms of avoided parking fines across the EU[190]	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 card when travelling to other Member States were the same as those granted in their country of origin).
Indirect benefits		
Wider macroeconomic benefits – 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.
Other non-monetary benefits – Protection of fundamental rights	n.a.	**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: Study supporting the impact assessment

Table 5 – Overview of costs – Preferred option B2

Description		Amount		Stakeholders	Comment
Activity	Type of cost	One-off	Recurrent		
Update of security	Direct adjustment	n.a.	Negligible	Administrations	These costs include the costs

[190] 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).

Description		Amount		Stakeholders	Comment
Activity	Type of cost	One-off	Recurrent		
features	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	Administrations	
Set-up of websites with information on the parking card	Direct adjustment costs	Negligible	Negligible	Administrations	As Member States already have an EU parking card website, the only costs are associated with updating the information

Source: Study supporting the impact assessment

Relevant Sustainable Development Goals

Table 6 – Overview of relevant Sustainable Development Goals[10] – Preferred Option

Relevant SDG	Expected progress towards the Goal	Comments
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.	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.	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 the both policy options A2 and B2 are expected to help close the travel gap with the general population regardless of the overall trend.

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.	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.	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 concerns11. 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 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.
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 special attention to the needs	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 the full recognition of national	An estimate of the costs for transport service providers are outlined in the report in Annex 4. 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 with disability who currently benefit from preferential

of those in vulnerable situations, women, children, persons with disabilities and older person.	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.	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: Study supporting the impact assessment

SMEs test

Table 7 – SMEs test

(1) Identification of affected businesses	
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. 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 asses 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. 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.	See Annex 6 for a mapping of services providing preferential conditions in the EU
(2) Consultation of SME stakeholders	
SME's representatives have been consulted in several of the data collection conducted as part of the Study.	See Annex 2 for the description of the

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 on overall negative impact (benefits minus costs), expressed by both SMEs and large service providers.[12] Actually, almost half of experienced positive returns from it. Likewise, there were several SMEs and two representatives of Business Europe among the participants in the workshop[13] 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.	stakeholders contacted, methodology and results of consultations methods
(3) Assessment of the impact on SMEs	
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.[14] 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%)	See chapter 6 on the expected economic impacts of the retained policy options; and chapter 7 on the efficiency of the retained policy options and chapter 8 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: Study supporting the impact assessment

ANNEX 4: ANALYTICAL METHODS

Introduction

The assessment of the policy options 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, a Multi-Criteria Decision Analysis is applied 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 4 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:

    - Individual travelers' journeys: these are obtained by estimating fictious 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 personals 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 travel propensity for the relevant population, although some assumptions are required, as outlined in the annex.

    - 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.

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 main report, in the Tables of chapter 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 1 below is an illustrative assessment table, which was used as a model for the MCDA.

Table 1 – Illustrative assessment table for the Policy Options

Criteria	Rate	Summary of assessment
Evaluation of effects		
Effectiveness	0/3	Description of the extent to which the policy option can be expected to achieve the identified policy objectives
Efficiency	0/3	Description of the costs of the initiative and its ability to efficiently mobilise resources for the achievement of the identified policy objectives
Necessity	0/3	Description of the extent to which the policy option is necessary, given the existing problems and their likely evolution in the baseline scenario
Coherence	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
Subsidiarity and	0/3	Description of whether the policy option is appropriate and does not

proportionality		go beyond what is necessary to address the problem satisfactorily
Types of impacts		
Social impacts	0/3	Description of the likely social impacts. These may include changes in relation to: 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	Description of the likely economic impacts. These may include changes in relation to: 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	Description of the likely digital impacts. These may include changes in relation to: 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; 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	Description of the likely environmental impacts. These may include changes in relation to: Mobility (of both persons with disabilities, personal assistants and accompanying persons such as family and friends); 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	Description of the likely impacts on fundamental rights. These may include changes in relation to: 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	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.

Source: Study supporting the impact assessment

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 2) 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.

Individual travellers 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 2 maps the different travellers journeys analysed.

Table 2– 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: Study supporting the impact assessment

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 persons 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)[191]. Although the two numbers are not directly comparable, this is the

[191] 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.

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 supporting the impact assessment 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 Hungary, 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 by a personal assistant 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 around EUR 102 per day in 2012 (and EUR 122 today, adjusted for inflation)[192], 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 3,

Table 4 and Source: *Study supporting the impact assessment*

Table 5 provide an overview of the different scenarios of individual travellers journeys carried out, with the respective sources used for the construction of the journeys.

[192] 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 3 – Scenario 1 of individual traveller 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.dublinexpress.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
Accomodation	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

Sector	Activity	Savings for person with disabilities (EUR)	Savings for personal assistant (EUR)	Notes	Sources
	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
	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/
Resturants		0	0	No resturant 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: Study supporting the impact assessment

Table 4 – Scenario 2 of individual traveller 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

Sector	Activity	Savings for person with disabilities (EUR)	Savings for personal assistant (EUR)	Notes	Sources
	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	
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 Donizzetti
	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	Gewiss Stadium Atalant

Sector	Activity	Savings for person with disabilities (EUR)	Savings for personal assistant (EUR)	Notes	Sources
				personal assistants	
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		
Savings per day		8	21		
Total savings for 4-months stay (travelling by public transport, 5 museums, 1 day trip by train, 2 events, 1 theatre, 3 cinema, 1 amusement park)		100			
Savings per day		2			

Source: Study supporting the impact assessment

Table 5 – Scenario 3 of individual traveller 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
	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	Buda Castle

Sector	Activity	Savings for person with disabilities (EUR)	Savings for personal assistant (EUR)	Notes	Sources
				senior people	
	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	
Accomodation		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		
Savings per day		11	20		
Total savings for 4-months stay (travelling by public transport, 5 museums, 1 day trip by train, 1 theatre, 3 cinema, 1 amusement park)		142			
Savings per day		2			

Source: Study supporting the impact assessment

Calculation of the travel gap

Table 6 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 chapter 2 of the main report this is shown to be a valid proxy for the number of persons with recognised disability in each Member State.

Finally, Table 6 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 main 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 6 – Data at the EU level for the estimation of the travel gap

Variable	Year	Amount	Source
Persons with "severe" disabilities	2012	30,917,031	Eurostat database, hlth_silc_12. Available at: link.
Persons with "severe" disabilities	2019	30,804,805	Eurostat database, demo_pjan. Available at: link. 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%	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%	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	2012	6.3%	Difference between the participation in tourism of the total population aged 15-64 and the participation in tourism of persons with

Variable	Year	Amount	Source
disabilities aged 15-64			disability aged 15-64
Participation in tourism of the total population aged 15-64 (*estimate*)	2030	74.7%	Obtained applying to the participation in tourism of the total population aged 15-64 in 2022 (assumed to be the same as 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 (*estimate, scenario of constant travel gap*)	2030	68.3%	Obtained applying the constant 6.3% travel gap of 2012 to the participation in tourism of the general population estimated for 2030.
Total number of persons with disabilities travelling (*estimate, scenario of constant travel gap*)	2030	21,053,378	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 (*estimate, scenario of increasing travel gap*)	2030	62.8%	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 (*estimate, scenario of increasing travel gap*)	2030	19,334,354	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 (estimate in the increasing travel gap scenario)	2030	11.9%	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 (*estimate, scenario of minimum improvements*)	2030	69.4%	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

Variable	Year	Amount	Source
			reports the travel propensity of persons with disabilities in a scenario of "minimum improvements" in accessibility.
Total number of persons with disabilities travelling (*estimate, scenario of minimum improvements*)	2030	21,378,534	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 (estimate in the minimum improvements scenario)	2030	5.3%	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 (*estimate, scenario of moderate improvements*)	2030	74.7%	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 travel propensity of persons with disabilities in a scenario of "moderate improvements" in accessibility.
Total number of persons with disabilities travelling (*estimate, scenario of moderate improvements*)	2030	23,011,189	Obtained by applying the estimated participation in tourism of persons with disabilities in 2030 (scenario of moderate 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).
Decreasing travel gap (estimate, the most optimistic scenario)	2030	0%	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 most optimistic scenario.

Source: Study supporting the impact assessment

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 to travellers with disabilities from other Member States. 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 that 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.[193] 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

[193] See presentation of Eurostat statistic: here

frequently than taking the bus in a metropolitan area. Further details are provided below and in Table 8.

- 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 7 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.[194] 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.

Table 7 – Estimation of tourism trips from persons with disabilities to selected Member States

Variable	Source	Year	Member State/EU 27	Amount

[194] 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.

Travel gap (difference between the participation in tourism of the general population and that of persons with disabilities aged 15-64)	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 15-64	Eurostat database, tour_dem_toage. Available at: link.	2019	EU 27	69.1%
Participation in tourism of persons with disabilities aged 15-65 (baseline estimate)	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 (best case scenario with EDC)	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	2021	EU 27	32%
Number of tourism trips (to	Eurostat database, tour_dem_ttw. Available at: link.	2019	Belgium	7,322,120
			Croatia	9,148,672

the Member State) of persons from other Member States			Estonia	2,338,333
			France	20,703,816
			Germany	21,381,766
			Hungary	4,299,138
			Ireland	2,228,143
			Italy	28,452,724
			Romania	3,876,987
			Spain	31,654,630
Number of tourism trips of persons with disabilities aged 16-65 from other Member States (baseline estimate)	Estimated multiplying the total number of tourism trips by the share of persons with disabilities aged 15-65 in the population, corrected by their participation in tourism	2019	Belgium	226,777
			Croatia	283,348
			Estonia	72,422
			France	641,229
			Germany	662,226
			Hungary	133,151
			Ireland	69,009
			Italy	881,225
			Romania	120,076
			Spain	980,393
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 disabilities in the population (hence, assuming the travel gap has closed)	2019	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: Study supporting the impact assessment 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 8 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 11, at the end of this Section.

Table 8 – 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, France, Germany, Hungary, Ireland, Italy, Romania, Spain
Short distance journey	Twice during the trip (return ticket)	
Medium distance journey	Once during the trip, for 50% of all trips	
Long distance journey	Once during the trip, for 20% of all trips	
Transfer to the airport	Twice during the trip (return ticket)	

Source: Study supporting the impact assessment

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 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;[195] ii) from the DG Grow report[196], 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%)[197] 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

[195] The data is available here (database: HLTH_DPEH) and elaborated by Eurostat at this link.
[196] 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.
[197] Study supporting the impact assessment based on Survey targeted at PwDs

recognized to obtain 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 voluntarily by service providers[198] . 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 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 of estimated total costs for each country are shown in Table 9. 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 of turnover[199] in 2019. The size of the passenger transport sector excluding air travel is not always publicly available for all Member States, as, for some Member States, the disaggregations that necessary to obtain this figure are marked as confidential in recent years.[200] Nonetheless, it was preferred to employ these figures for comparison, when available, rather than the total turnover (or value added) in the *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 2021[201]) and, although they are estimated to have a lower participation in tourism than PwD (49.6% in 2019[202]), 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 2021[203] , 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 9, the cost of offering preferential conditions to travelling PwD aged 15-65 and their personal assistants in the transport sector is compared to the

[198] See an example here.
[199] For the definition of turnover, see Eurostat
[200] The data is available from Eurostat dataset: SBS_NA_1A_SE_R2, at the following **link**.
[201] Source: Eurostat, link
[202] Source, Eurostat, link
[203] See here for the incididence of severe limitations for the EU population aged 65+.

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 the passenger transport sector can be obtained, these additional costs appear very small relative to overall turnover, ranging from 0.01% to 0.31%. Table 9 also presents what it 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.

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 the absence of information on how many persons with disability currently travelling benefit from preferential conditions in the transport sector.

Table 9 – 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**
	*As %Turnover of passenger transport sector**	0.11% - 0.16%	N/A	0.24% - 0.31% (e)	0.02% - 0.04%	0.05%-0.06% (e)

	As % of cost of offering same preferential conditions to all 65+	22.5% - 31.7%	18.5%- 22.8%	19.8% - 25.7%	28.5% - 44.7%	17.8% - 21.0%

Source: Study supporting the impact assessment. *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 9 Continued – Range of estimated yearly costs in the transport sector in selected Member States

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**
	As %Turnover of passenger transport *	0.16% - 0.20% (e)	0.11% - 0.15% (e)	0.01% - 0.02%	0.11%- 0.15%	0.16%- 0.22% (e)
	As % cost of offering same preferential conditions to all 65+	19.6% - 25.2%	19.8% - 25.7%	45.7%- 80.2% ++	19.8% - 25.7%	21.8% - 30.1%

Source: Study supporting the impact assessment. *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.

Costs		Hungary	Ireland	Italy	Romania	Spain
Costs due to **trips from persons with**	**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**

disabilities 15 to 65 from other Member States (**including personal assistants**)						
	As %Turnover of passenger transport *	0.16% - 0.20% (e)	0.11% - 0.15% (e)	0.01% - 0.02%	0.11%- 0.15%	0.16%- 0.22% (e)

The range of estimated costs in the total EU-27 is presented in Table 10. 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 10 – Range of estimated yearly costs in the transport sector at EU 27 level

Country	*Per capita cost* Lower bound	*Per capita cost* Upper bound	*Population (2021)*
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
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: Study supporting the impact assessment. *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 11 – Detailed assessment of costs for service providers in the transport sector through travellers journeys

Member State	Activity	Savings for person with disabilities (EUR)	Savings for personal assistant (EUR)	Km	Notes	Sources
Belgium	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.
	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.
	Medium distance trip by	3.6	8.4	55	50% discount; need to have a specific card in order to receive a	Belgiantrain website.

	train (Brussels to Antwerp)				discount, the accompanying person needs to have a card that recognises them as an accompanying person.	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 costs for a trip of 5-days	32.6	51.7			
Croatia	Standard bus fare in the city of Zaghreb	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 (Zaghreb 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 (Zaghreb to Karlovac)	3.4	4.6	53	75% discount; the assistant travels for free	Hzpp website. Available at: link.
	Long distance trip by train (Zaghreb 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 Zaghreb)	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			
Estonia	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 100% discount, without need to show a document	Website for travel in Tallinn. Available at: link.
	Short distance	2.0	2.0	20	100% discount, only available if	Elron website.

	trip by train (Tallinn to Saue)				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	Available at: link.
	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			
France	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 the person with disabilities needs to be accompanied	Flixbus website. 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			
Germany	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 (*Schwerbehindertenausweis*)	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 (*Schwerbehindertenausweis*)	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 (*Schwerbehindertenausweis*)	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 (*Schwerbehindertenausweis*)	Deutsche Bahn website. Available at: link.
	Berlin to airport	4	0	30	100% discount for persons with severe disability who hold a specific card (*Schwerbehindertenausweis*)	Deutsche Bahn website. Available at: link.
	Total costs for a trip of 5-days	32.6	51.7			
Hungary	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: link; prices, available at: link.
	Short distance	2.9	2.9	40	90% discount on regional	BKK website,

	by train (Budapest to Visegrad)				transport	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.		
Ireland	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 disabilities, and refers to the Free Travel Scheme	Citylink website. Available at: link.
	Medium distance by	34.1	34.1	195	100% discount, but the person needs to be a Free Travel Pass	Irishrail website.

	train (Dublin to Limerick)				holder	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			
Italy	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.
	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	Italo website, Policy, available at: link; Offers,

					seniors. There are preferential conditions, but related to service, and help in reserving seats.	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			
Romania	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.		
Spain	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 pasts costs EUR 2 for persons with disabilities; accompanying persons needs 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 receives the same discount if the person has a 65% or greater disability.	Venta website. Available at: link.
	Medium	2.8	2.8	73	25% discount; discount only	Venta website.

	distance trip by train (Madrid to Toledo)				provided with the Tarjeta Dourada card; the assistant receives the same discount if the person has a 65% or greater disability.	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: Study supporting the impact assessment

Final ranking matrix

Following the assessment of the policy options through the MCDA, 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 11.

Table 11– Ilustrative final ranking matrix

Policy option	Direction	Score
Baseline	+/-	0

Policy option 1	+	5
Policy option 2	+	11

Source: Study supporting the impact assessment

ANNEX 5: COMPETITIVENESS CHECK

1. Overview of impacts on competitiveness

The impacts of policy options A2 and B2 on competitiveness and SMEs are analysed in Chapter 6. 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 market[204] and they would be positively impacted by the increased travel flows of persons with disabilities from other Member States.

Table 1 – Overview of impacts on competitiveness – Preferred Options

Dimensions of Competitiveness	Impact of the initiative (++ / + / 0 / - / -- / n.a.)	References to sub-chapters of the main report or annexes	Comment
Cost and price competitiveness	0	Chapter 6	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 (such as family and friends): 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.[205] This cost is estimated at: • 254 and 353 million EUR yearly for A2.

[204] 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.

[205] Study supporting the impact assessment based on Survey on costs targeted at service providers

			• roughly 40 million EUR to 55 million EUR yearly for B2 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 practically negligible and are unlikely to reflect into prices.
International competitiveness	+	Chapter 6	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 disabilities, as well as costs and uncertainty for service providers regarding the validity of the different national IDs. By removing difficulties in 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. 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.
Capacity to innovate	0	Chapter 6	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	Chapter 6 Annex 3	SME competitiveness is not expected to be significantly impacted relative to other business.

2. Synthetic assessment

The preferred policy options are not expected to have significant impacts on competitiveness, nor particularly negative effects on SMEs. The policy options are 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, such as family and friends), 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 6: EVIDENCE FEEDING THE PROBLEM DEFINITION

1. Disability assessment in the Member States

National disability cards and certificates are 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 provisions of laws.[206] Box 1 below includes an overview of the main approaches used to undertake disability assessments across the Member States.

Box 1 – Main approaches to disability assessment[207]

- 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: Study supporting the impact assessment

Disability status is often assessed based on a combination of two or more methods.

Table 1 – Member States' disability assessment methods[208]

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: Study supporting the impact assessment

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[206] 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.

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

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

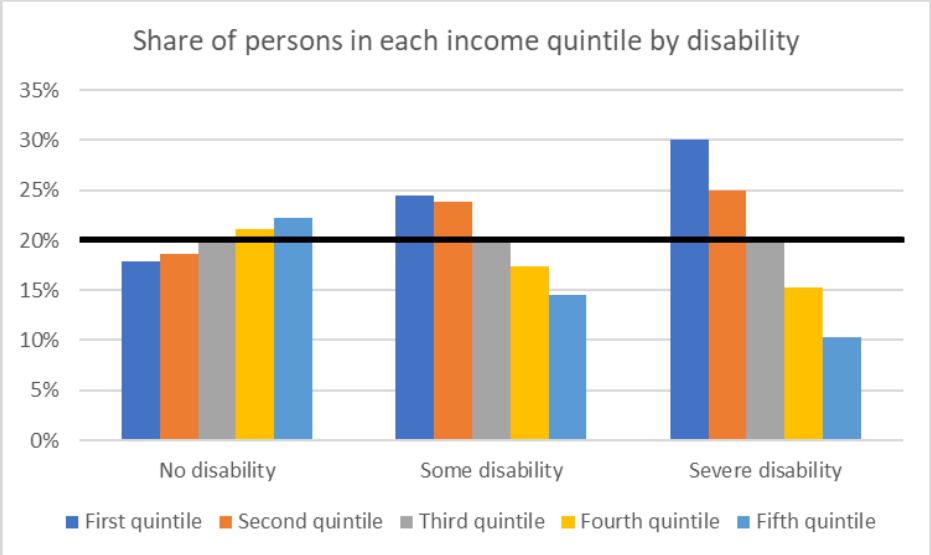
Box 2 - Examples of requests for clarification received by SOLVIT

- 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: Study supporting the impact assessment based on the SOLVIT platformbased on the SOLVIT platform

2. **Statistics on disability (including tourism and travel patterns)**

Figure 1– Shares of EU population by disability and income quintile 2021



Source: Eurostat data, Study supporting the impact assessment

Table 2 - Data on tourism and travel patterns of the general population and persons with disabilities

Member State	Share of persons aged 15-64 participating in tourism, 2012	Share of persons with disabilities participating in tourism, 2012-2013	Gap participation in tourism between the general population and persons with disabilities, 2012	Share of persons aged 15-64 participating in tourism, 2019	Corrected number of persons with disabilities travelling, 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: Study for the impact assessment based on Eurostat data and DG GROW's report on accessible tourism in Europe[209]

[209] 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.

3. 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,[210] as amended by Council Recommendation 2008/205/EC.[211] It 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 **Box 3**).

Box 3 – 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, paragraph 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'.[212] 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.[213] In this sense, the Recommendation also foresees that full information on the conditions for using the EU parking card should be provided to cardholders.[214] In particular, paragraph 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 EU when issuing a parking card to persons with disabilities and at the request of the persons concerned'.[215] Moreover, the EU parking card is issued to a named

[210] 98/376/EC: Council Recommendation of 4 June 1998 on a parking card for people with disabilities. Available at: link.
[211] 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.
[212] 98/376/EC: Council Recommendation of 4 June 1998 on a parking card for people with disabilities. Available at: link.
[213] 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).
[214] 98/376/EC: Council Recommendation of 4 June 1998 on a parking card for people with disabilities. Available at: link.
[215] Ibid.

person with recognised disability status, rather than to a specific vehicle, so it is transferable to any vehicle the person may be using.[216]

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 EU, with the most recognisable component being the international disability symbol represmj enting a wheelchair.[217] 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.[218] 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.[219]

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 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 3** for a general overview on the number of valid EU parking cards or the cards issued in a given year and see **Figure** for a comparison among the number of valid cards in some of the Member States) as well as by the number of consulted persons with disabilities claiming to be aware of the card[220] and to use it.[221] Also the majority of respondents to the public consultation claimed to be aware of the EU parking card[222] and, among those owning the card, to make use of it.[223]

[216] European Parliament (2022), Disability assessment, mutual recognition and the EU Disability Card - Progress and opportunities. Available at: link.
[217] Ibid.
[218] 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.
[219] 98/376/EC: Council Recommendation of 4 June 1998 on a parking card for people with disabilities. Available at: link.
[220] Study supporting the impact assessment based on Survey targeted at PwD
[221] Ibid.
[222] Study supporting the impact assessment
[223] Ibid.

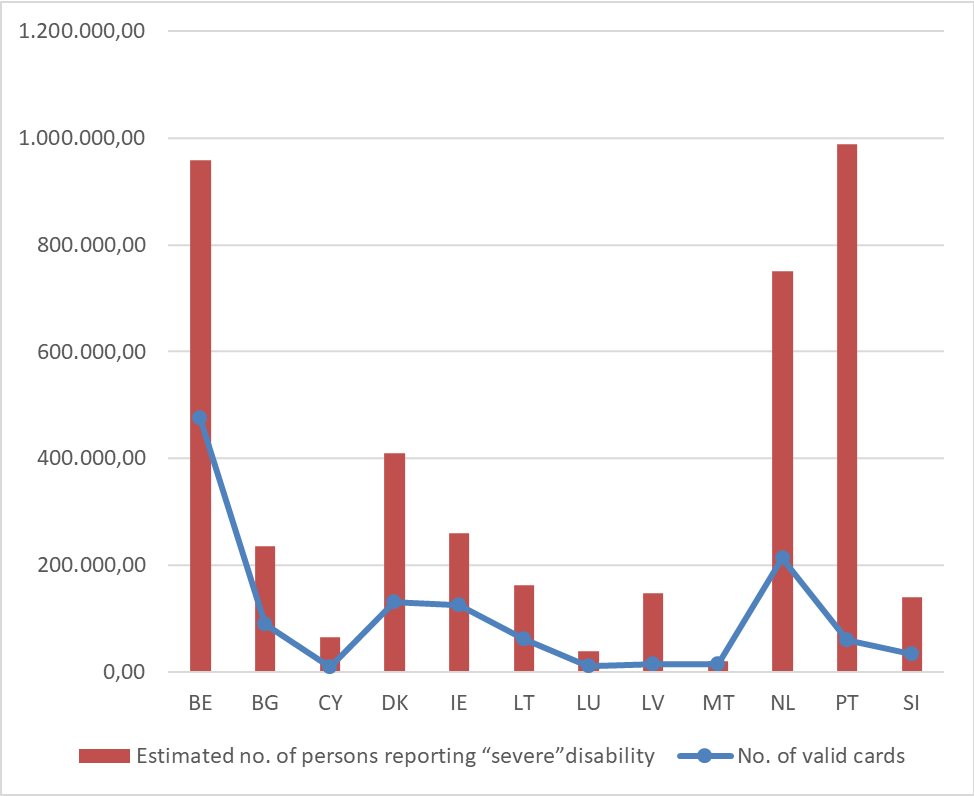
Table 3 – Number of existing EU parking cards per Member State

Member States[224]	Number of cards	Notes
AT	2022: 100,000	Issued since 1 January 2014
BE	2021: 472,492	
BG	2019: 16,020	Total number of cardholders in Sofia
CY	2023: 9,628	
DK	2023: 130,000	
FI	2018: 14,926 2019: 15,342 2020: 14,221 2021: 14,809 2022: 17,450	Cards issued in years 2018-2022
FR	2017-2018: 630,000	Cards issued between 1 Jan 2017 and 1 February 2019
IE	2022: 120 - 125,000	
LT	2023: 61,953	N. of cardholders in the period of 01/01/2010 - 31/12/2022
LV	2023:14,540	
MT	2017: 9,752 2019: 10,589 2020: 8,485 2021: 11,239 2022: 13,299 2023: 13,552	
NL	2023: 213,251	
PL	2022: 277,838	
PT	2023: 59,514	
SE	2013-2022: 21,933	Number of cards issued in Stockholm in years 2013-2022
SI	2019: 26,763 2023: 33,291	

Source: Study supporting the impact assessment

[224] CZ, DE, EE, EL, ES, HR, HU, IT, LU, RO, SK: no data available.

Figure 2 – Number of valid EU parking cards per Member State compared to the estimated no. of persons reporting "severe" disability[225]



Source: Study supporting the impact assessment 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,**[226] **hence facilitating the free movement of persons with disabilities** across the Member States, according to 38 out of 87 respondents to the online surveys[227] and by 74% of respondents to the Public Consultation.[228] 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.[229]

[225] **Error! Reference source not found.** 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.

[226] Study supporting the impact assessment based on 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 2).

[227] Study supporting the impact assessment Survey targeted at NCAs Q3.2 - Facilitating the exercises of the free movement rights for persons with disability; 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 2).

[228] Study supporting the impact assessment

[229] EDF recommendations for strengthening the EU Parking Card 2020. Available at: link.

In this respect, the majority of persons with disabilities consulted declared to use the EU parking card abroad[230] and agreed that the card facilitates travels to other Member States.[231]

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.[232] In line with the principle of subsidiarity, disability 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.[233] 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 remarkable 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.[234]

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.[235] 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. For instance, in some Member States, the EU parking card may be available to everyone who has a national disability card, or who appears on a national disability register[236] (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 may be 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.

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[230] Study supporting the impact assessment based on Survey targeted at PwD
[231] Ibid.
[232] EDF recommendations for strengthening the EU Parking Card 2020. Available at: link.
[233] 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.
[234] Do not take my spot! – The EU Disability Parking Card. Available at: link.
[235] 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).
[236] European Parliament (2022) Disability assessment, mutual recognition and the EU Disability Card - Progress and opportunities. Available at: link.

Indeed, paragraph 3 of the Recommendation suggests that the EU parking card should be granted to a person with a disability that leads to reduced mobility.[237]

Table 4 – Member States' different eligibility criteria for obtaining the EU parking card[238]

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: Study supporting the impact assessment

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 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.[239] In this respect, a representative from an EU-level parking association interviewed 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.[240]

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.[241] The centralised model is generally linked with lower risk of frauds and forgeries as compared to a decentralised model.[242] 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.

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[237] 98/376/EC: Council Recommendation of 4 June 1998 on a parking card for people with disabilities. Available at: link.

[238] With 'severe disability' is meant amputation of limbs, severe mobility impairment, blindness, etc.

[239] Do not take my spot! – The EU Disability Parking Card. Available at: link.

[240] Targeted interview with one EU Parking association (#3).

[241] European Commission (2019) Parking card for persons with disabilities - Updated overview (shared by EC, not published).

[242] Minutes from the EU Disability High Level Group meeting 14 May 2019 – 9.30 to 16.30. Available at: link.

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.[243] Table 5 below provides an overview of different management systems in place across EU.

Table 5 – 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: Study supporting the impact assessment

Regarding the mixed model, Table below illustrates different approaches adopted across Member States.

Table 6 – 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: Study supporting the impact assessment

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 in the design of the cards issued by the Member States, reinforced by a lack of coordination. 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).[244] 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.[245] A further element of complexity is the coexistence of older and newer models of cards. For example, since 2017, in France the EU 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.

[243] European Commission (2019) Parking card for persons with disabilities - Updated overview.
[244] Do not take my spot! – The EU Disability Parking Card. Available at: link.
[245] Study supporting the impact assessment based on Survey targeted at national CSOs

Table 7 – Examples of additional features with respect to the standard EU 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: Study supporting the impact assessment

Member States have added these features, not originally foreseen in the Recommendation, in order to better prevent frauds and forgeries.[246] Frauds may 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, for example, 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 multiple languages. Therefore, its meaning is not immediately clear to local authorities or service providers of other

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

Member States where the card is used, unless they can understand the text written in a foreign language.[247]

Several respondents to the online surveys confirmed that national differences in terms of validity period[248] and design[249] 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 workshops claimed that national differences in terms of design and functioning of the EU parking card hinder its mutual recognition across the Member States.[250] Furthermore, 3 out of 15 persons with disabilities consulted during the survey confirmed to have faced problems linked to the non-recognition of their EU parking card in another Member State,[251] as well as the majority of respondents to the Public Consultation.[252] From 2018 to 2022, around 30 enquiries were submitted thought he 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 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[253]	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	✓	✓			✓[254]
Denmark		✓[255]	✓	✓	✓[256]
Estonia		✓	✓	✓	
Finland	✓	✓	✓	✓	

[247] European Parliament (2022) Disability assessment, mutual recognition and the EU Disability Card - Progress and opportunities. Available at: link.
[248] Study supporting the impact assessment based on Survey targeted at NCAs; Survey targeted at other Pas; Survey targeted at EU-level CSOs; Survey targeted at national CSOs
[249] Study supporting the impact assessment based on Survey targeted at NCAs; Survey targeted at other Pas; Survey targeted at EU-level CSOs; Survey targeted at national CSOs
[250] Study supporting the impact assessment based on Respondents to the online workshop with CSOs held on 22 March 2023; Respondents to the online workshop with NCAs held on 23 March 2023
[251] Study supporting the impact assessment based on Survey targeted at PwDs.
[252] Study supporting the impact assessment based on Public Consultation (standard questionnaire)
[253] If not causing obstructions.
[254] Allowed only in individual cases and if urgently necessary.
[255] Allowed for maximum 15 minutes.
[256] 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[253]	Free parking in paid parking areas	No time limit parking in areas subject to time limits	Parking in pedestrian zones
France	✓		✓	✓	
Germany		✓	✓	✓	✓[257]
Greece	✓			✓	
Hungary		✓	✓	✓	✓
Ireland	✓				
Italy	✓	✓	✓		
Latvia					
Lithuania	✓	✓	✓[258]	✓	
Luxembourg	✓				
Malta	✓				
Netherlands	✓	✓[259]			
Poland	✓	✓			
Portugal		✓[260]			
Romania			✓		
Slovakia	✓		✓		
Slovenia	✓				
Spain					
Sweden	✓	✓[261]	✓	✓	✓[262]

Source: Study supporting the impact assessment

In the survey, 8 out of 25 NCAs,[263] 4 out of 5 other public authorities,[264] 11 out of 23 national CSOs,[265] 7 out of 10 of EU-level CSOs[266] and 10 out of 24 persons with disabilities[267] 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

[257] Allowed only if explicitly allowed by local concessions and during the specified times.
[258] Allowed only in spaces marked with a wheelchair symbol.
[259] Allowed for maximum 3 hours.
[260] Allowed only in case of absolute necessity, for a short time and without obstructing other vehicles or pedestrians.
[261] Allowed for maximum 3 hours.
[262] Allowed for maximum 3 hours.
[263] Study supporting the impact assessment based on Survey targeted at NCAs
[264] Study supporting the impact assessment based on Survey targeted at other public authorities
[265] Study supporting the impact assessment based on Survey targeted at national CSOs
[266] Study supporting the impact assessment based on Survey targeted at EU-level CSOs
[267] Study supporting the impact assessment based on Survey targeted at PwDs

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.

Box 4 - Examples of complaints received by SOLVIT on the EU parking card

- A French cardholder asked what rights are granted by the EU parking card in the Czech Republic; 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.
- 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.
- 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.
- 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.

Source: Study supporting the impact assessment based on the SOLVIT platform

As a consequence, **national differences in the EU parking card result in some difficulties in the exercise offreedom 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 respondents of the survey targeted at NCAs,[268] 2 out of 5 other public authorities,[269] 9 out of 23 national CSOs,[270] 6 out of 10 EU-level CSOs[271] and 11 out of 24 persons with disabilities.[272]

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, negatively affecting the exercise of their freedom of movement.[273] 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.[274]

[268] Study supporting the impact assessment based on Survey targeted at NCAs
[269] Study supporting the impact assessment based on Survey targeted at other public authorities
[270] Study supporting the impact assessment based on Survey targeted at national CSOs
[271] Study supporting the impact assessment based on Survey targeted at EU-level CSOs
[272] Study supporting the impact assessment based on Survey targeted at PwDs
[273] European Parliament (2022) Disability assessment, mutual recognition and the EU Disability Card - Progress and opportunities. Available at: link.
[274] 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.

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 premises**[275] **and to fully exercise their right to mobility in the EU**.[276] Respectively 14 out of 23 national CSOs and 5 out of 10 EU-level CSOs responding to the survey agreed that these issues hinder to a high or very high extent mostly the ability to easily access different premises.[277] 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 administrative burden/burden of obtaining information about the different parking conditions for persons with disabilities.[278] During a interview conducted with a representative of a EU Parking association,[279] 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 to facilitate their free movement**, as shown by the number of valid EU parking cards in place (see 7 above) and the high percentage of consulted persons with disabilities claiming to be aware of the EU parking card[280] and to use it[281]. Moreover, according to the 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 believe that the EU parking card is still relevant to meet the current needs of persons with disabilities.[282] 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 adopted in 1998, almost 25 years ago, and which has never been updated to meet new developments and needs. Council Recommendation 2008/205/EC,[283] which amended Council Recommendation

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[275] Study supporting the impact assessment based on Survey targeted at PwDs
[276] Study supporting the impact assessment based on Survey targeted at PwDs
[277] Study supporting the impact assessment based on Survey targeted at EU-level CSOs
[278] Study supporting the impact assessment based on Survey targeted at NCAs; Survey targeted at other public authorities; Survey targeted at EU-level CSOs; Survey targeted at national CSOs
[279] Study supporting the impact assessment based on Targeted interview with one EU Parking association
[280] Study supporting the impact assessment based on Survey targeted at PwDs
[281] Ibid.
[282] Study supporting the impact assessment based on Survey targeted at NCAs; Survey targeted at other public authorities; Survey targeted at EU-level CSOs; Survey targeted at national CSOs
[283] 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.

98/376/EC,[284] 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.[285] According to a representative from an EU-level parking association interviewed, 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.[286]

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 in previous section). According to the 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 frauds[287] and forgeries.[288] On this point, a representative from an EU-level parking association interviewed 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.[289] 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, 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 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.[290]

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[284] 98/376/EC: Council Recommendation of 4 June 1998 on a parking card for people with disabilities. Available at: link.

[285] Gonda, T. (2021). Travelling Habits of People with Disabilities. *GeoJournal of Tourism and Geosites*, 37(3), 844–850. Available at: link.

[286] Study supporting the impact assessment based on Targeted interview with one EU Parking association

[287] Study supporting the impact assessment based on Survey targeted at NCAs; Survey targeted at other public authorities; Survey targeted at national CSOs; Survey targeted at EU-level CSOs

[288] Study supporting the impact assessment based on Survey targeted at NCAs; Survey targeted at other public authorities; Survey targeted at national CSOs; Survey targeted at EU-level CSOs

[289] Study supporting the impact assessment based on Targeted interview with one EU Parking association

[290] Ibid.

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 use 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.[291] 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.[292]

In this regard, 6 out of 7 CSOs and 13 out of 19 NCAs participating to the 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.[293]

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 5**).[294]

Box 5 – 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.[295] 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.[296] 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,

[291] Ibid.
[292] Ibid.
[293] Study supporting the impact assessment based on Respondents to the online workshop with CSOs held on 22 March 2023 and to the online workshop with NCAs held on 23 March 2023.
[294] 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).
[295] 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.
[296] 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).

reducing frauds, and would help to overcome the issues linked to the EU parking card recognition in different languages.[297]

Source: Study supporting the impact assessment

How coherent is the EU parking card with other EU policies

This section aims at understanding 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.[298] 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.[299] 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.

[297] European Parliament (2022) Disability assessment, mutual recognition and the EU Disability Card - Progress and opportunities. Available at: link.
[298] 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.
[299] Ibid.

Table 9 – Comparison between the EU Disability Card and the EU parking card in the Member States participating to the pilot project

Member State	Elements of comparison	EU Disability Card	EU Parking Card
BE	**Issuing authority**	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)	Public Service Social Security.
	Eligibility criteria	Persons recognised by or receive help from an official institution for persons with disabilities. Children receiving increased child benefit.	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	Making activities, such as sports events, museum visits and other leisure activities, more accessible.	Parking and traffic rights.
CY	**Issuing authority**	Department for Social Inclusion of Persons with Disabilities.	Department for Social Inclusion of Persons with Disabilities.
	Eligibility criteria	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.	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. "Persons with disabilities" for the purposes of issuing Parking card means: 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
			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 undergo heamodialysis.
	Rights granted	It ensures equal access to some specific benefits in the field of culture, tourism, entertainment, sports and transports.	Parking and traffic rights.
EE	**Issuing authority**	National Social Insurance Board.	Issuing authority: National Social Insurance Board.
	Eligibility criteria	All persons with disabilities that have a disability certificate issued by Social Insurance Board (degree and type of disability and duration of disability).	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	Benefits (not specified).	Parking and traffic rights.
FI	**Issuing authority**	Kela (an independent social security institution supervised by the Finnish Parliament).	Finnish Transport and Communications Agency.
	Eligibility criteria	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; 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	Persons with disabilities resulting from an illness, problem or disability preventing the individual from walking and the disability category for this impairment is 11 or higher; Persons with disabilities 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
		accompanying them.	
	Rights granted	Disability allowance, care allowance and interpreter assistance.	Parking and traffic rights.
IT	**Issuing authority**	INPS (National Institute of Social Security)	Municipality of residence.
	Eligibility criteria	Persons with disabilities from 67% to 100% disability or from 50% if deriving from the workplace; Persons with accompanying allowance; Blind persons; Deaf persons.	Persons with significantly reduced walking ability; Blind persons. For a period of less than five years, therefore for a limited period, the card can be released also to: 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	Free access or discounts to access national museums and other cultural premises.	Parking and traffic rights.
MT	**Issuing authority**	Commission for the Rights of Persons with Disability (CRPD).	Aġenzija Sapport.
	Eligibility criteria	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 UNCRPD.	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; Persons with a severe mental impairment or who

Member State	Elements of comparison	EU Disability Card	EU Parking Card
			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	Free access and discounts to cultural and touristic destinations.	Parking and traffic rights.
RO	**Issuing authority**	National Authority for the Protection of the Rights of Persons with Disabilities.	Local public authority.
	Eligibility criteria	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.	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	Free or partially subsidized access for people with disabilities to cultural, sporting and leisure events.	Parking and traffic rights.
SI	**Issuing authority**	Local administrative offices.	Local administrative offices.
	Eligibility criteria	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); 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	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 with intellectual disabilities 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
		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).	Persons with at least 90% physical impairment due to visual loss; Minors who have physically or mentally disability or are reduced mobility due to lower limbs or pelvis related impairments; 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	Various discounts - like entry ticket to a museum or better access to attractions at a theme park.	Parking and traffic rights.

Source: Study supporting the impact assessment

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 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.[300] 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.[301]

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 EU.[302]

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,*

[300] Study supporting the impact assessment based on Survey targeted at NCAs
[301] Study supporting the impact assessment based on Survey targeted at NCAs
[302] European Pillars of Social Rights. Available at: link.

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.[303] 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 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.[304]

How cost-efficient was the implementation of the EU parking card

This section aims at understanding whether 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 disabilities 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,[305] 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.[306]

Finally, no 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, the increasing divergences in the design of the EU parking

[303] The European Green Deal. Available at: link.
[304] European Disability Forum (2019) An inclusive Green Deal for Europe. Available at: link.
[305] Study supporting the impact assessment based on Survey targeted at NCAs; Survey targeted at other public authorities
[306] Study supporting the impact assessment based on Survey targeted at NCAs; Survey targeted at other public authorities; Survey targeted at national CSOs; Survey targeted at EU-level CSOs

card across the Member States have raised the need to provide parking controllers with ad-hoc trainings on the different types of cards in place.[307]

What is the EU added value of the EU parking card compared to keeping different national parking cards

Despite its shortcomings, 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.[308] Similarly, a survey conducted by the EDF in 2020 showed that the EU parking card is seen 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.[309] In addition, 14 out of 24 persons with disabilities consulted in the context of the survey declared to use the EU parking card when travelling abroad[310] and agreed that the card facilitates travels to other Member States.[311]

A representative from an EU-level parking association interviewed 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),[312] 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.[313]

[307] Study supporting the impact assessment based on Targeted interview with one EU Parking association
[308] Study supporting the impact assessment based on Survey targeted at NCAs; Survey targeted at other public authorities; Survey targeted at national CSOs; Survey targeted at EU-level CSOs
[309] EDF recommendations for strengthening the EU Parking Card 2020. Available at: link.
[310] Study supporting the impact assessment based on Survey targeted at PwDs.
[311] Study supporting the impact assessment based on Survey targeted at PwDs
[312] Eucaris. Available at: link.
[313] Study supporting the impact assessment based on Targeted interview with one EU Parking association

4. Mapping of services providing preferential conditions in the EU

Most common preferential conditions offered to persons can be discerned into the following categories:

- Monetary support;
- Grants;
- Other type of support.

Given that scope of the initiative 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 which may – in a handful of cases – also cover adaption 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 initiative.

Box 6 provides examples of the types of monetary support provided in some Member States.

Box 6 – Examples of monetary support provided in some Member States [314]

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

[314] Study supporting the impact assessment

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 person with severe disability 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: Study supporting the impact assessment

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 7** provides examples of the types of preferential conditions provided in some Member States.

Box 7 – Examples of other support provided in some Member States [315]

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

[315] Study supporting the impact assessment

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.

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" persons with disabilities 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: Study supporting the impact assessment

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 choice. In Estonia, preferential conditions for assistants differ across the various sectors. For example, in public transportation the assistant of persons with visual impairments rides free of charge while when visiting a theatre, the assistants pay 50% of the price.

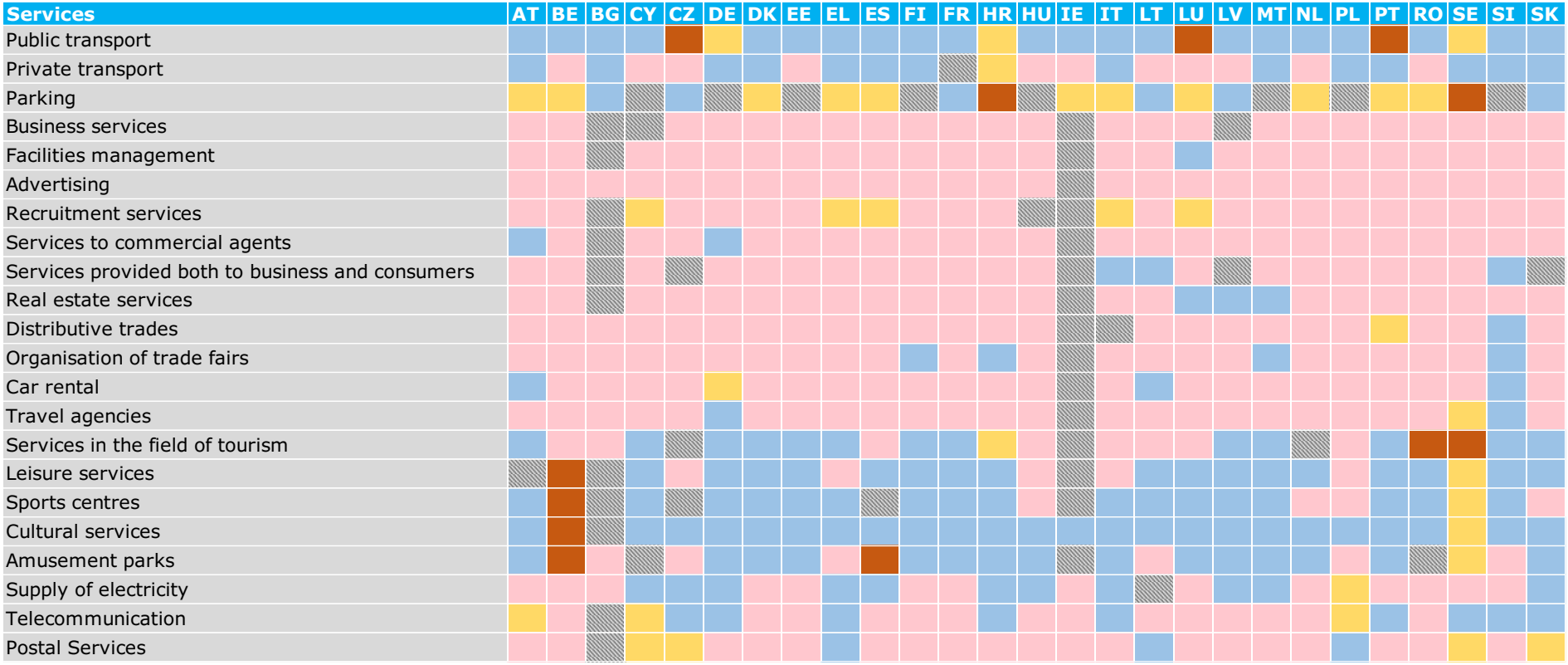
The analysis indicates that there is limited consistency in the types of preferential conditions offered across the Member States. The assessment found commonalities across the Member States regarding reduced costs for persons with disabilities in a few key sectors. These most common preferential treatment 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 below provides a complete overview of preferential conditions offered per Member State and per service sector.

Table 10 – Overview of the types of preferential conditions offered to persons with disabilities across the Member States



Source: Study supporting the impact assessment

- **Residents with disabilities**

In most Member States, **preferential conditions to residents with disabilities** are offered in the following services:[316]

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

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 services.[317] 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.[318] 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.

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).[319] 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 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.[320]

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.[321]

Table 11 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.

[316] Study supporting the impact assessment
[317] Ibid.
[318] Ibid.
[319] Ibid.
[320] Ibid.
[321] Persons with disabilities from other Member States holding a card with similar conditions, this will be accepted as equal to the Dutch card.

Table 11 – Mapping of services for which preferential condition are offered to 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																											
Private transport																											
Parking																											
Business services																											
Facilities management																											
Advertising																											
Recruitment services																											
Services to commercial agents																											
Services provided both to business and consumers																											
Real estate services																											
Distributive trades																											
Organisation of trade fairs																											
Car rental																											
Travel agencies																											
Services in the field of tourism																											
Leisure services																											
Sports centres																											
Cultural services																											
Amusement parks																											
Supply of electricity																											
Telecommunication																											
Postal Services																											

Legend					
Yes (mandatory)	Yes (voluntary)	Yes (both)	Yes (not specified)	No	n.a.

Source: Study supporting the impact assessment

- **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.[322]

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.

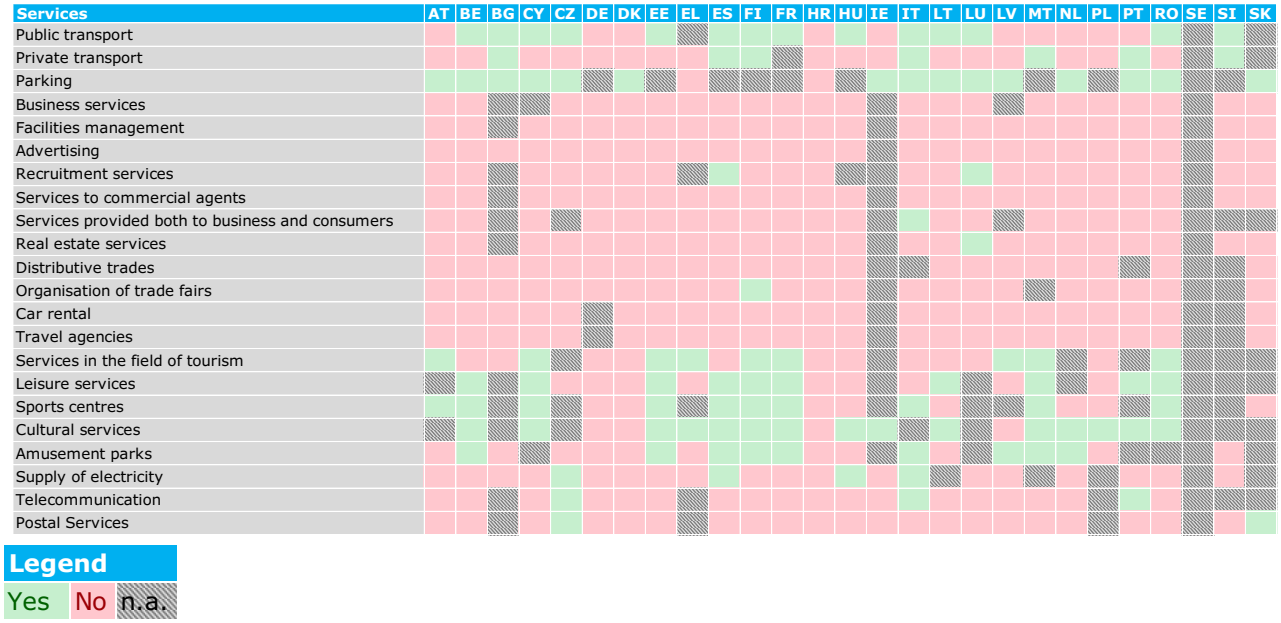
To conclude, survey results confirm that there is very limited offer of preferential conditions to non-residents as compared to residents with disabilities.[323]

Table 12 below provides for an overview of the preferential conditions offered to non-residents with disabilities.

[322] Study supporting the impact assessment

[323] Study supporting the impact assessment based on Survey targeted at NCAs; Survey targeted at other relevant public authorities; Survey targeted at NCAs; Survey targeted at other relevant PAs

Table 12 – Mapping of services for which preferential condition are offered to non-residents with disabilities across the Member States



Source: Study supporting the impact assessment

Box 8 – cases/examples of difficulties in accessing preferential conditions in 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.[this partially overlaps with the next sentence - could one of the two sentences be skipped/both be merged?]

- 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.

- They stated that their national disability card was not accepted when travelling to Hungary, hence they could not access public transport discounts.

A Hungarian citizen with disabilities stated that his national disability card was not accepted during travels for short-term stays in at least seven Member States (AT, CZ, DE, DK, FR, PL, SK).

Three Austrian citizens with disabilities stated 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.

A blind person [which nationality?] complained 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.

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 personal assistants travel free of charge on the same basis as personal 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 take part in the pilot.[324]

Source: Study supporting the impact assessment

[324] Study supporting the impact assessment based on Workshop with NCAs held on 23 March 2023.

ANNEX 7: INTERVENTION LOGIC, AND MONITORING

Table 1 - 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 access to preferiental conditions including those related to services is hampered as their disability status is not recognised.	A. There is limited acceptance across the EU of national disability cards and certificates of non-residents with disabilities issued by other Member States. A.1 Insufficient awareness and knowledge of different national disability cards and certificates A.2 No obligation to accept and limited voluntary acceptance of national disability cards and certificates	**SO1:** To facilitate mutual recognition of disability status when persons with disabilities travel to or visit other Member States.	**A1:** To introduce an EDC in all Member States on a mandatory basis by means of an EU legislative act, which provides for mutual recognition of disability status of persons with disabilities that travel for short-term stays (up to three months) in the EU limited to the culture, leisure, sport and transport. **A2**: To introduce an EDC in all Member States on a mandatory basis by means of an EU legislative act, which provides for mutual recognition of disability status of persons with disabilities that travel for short-term stays (up to three months) in the EU.
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 EU parking cards for persons with disabilities.	**SO2:** To facilitate use and legal certainty in the use of the EU parking card for persons with disabilitie.	**B1:** To amend Recommendation 98/376/EC with a view to facilitating mutual recognition of the EU parking card; **B2:** To repeal Recommendation 98/376/EC with an EU legislative act, which provides for mutual recognition of national

Problems	Drivers	Specific Objectives	Policy options
			parking cards for persons with disabilities, based on a common EU model.

Table 2 – Monitoring indicators for the preferred policy option

Specific objectives	Operational objectives	Indicators	Sources of data
To facilitate mutual recognition of disability status when persons with disabilities travel to or visit other Member States	Ensure that persons with disabilities recognised in another country have access to preferential conditions Ensure that the application systems is 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	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	Transposition checks Member States' data (National and Local Authorities) SOLVIT platform complaints Potential ad hoc survey/study

To facilitate use and legal certainty in the use of the EU parking card for persons with disabilities.	Ensure that persons with disabilities recognised in another country can use the parking facilities	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	Member States' data (National and Local Authorities) SOLVIT platform complaints Potential ad hoc survey/study
	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		
	(Common to both specific objectives) Improve information on how to get and use the European Disability Card and the EU parking card.	% 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	Potential ad hoc survey/study Member States' data (National and Local Authorities)

		parking card applications (through national application procedures), and issued in each Member State	

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.

ANNEX 8: IMPACTS OF THE POLICY OPTIONS

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 1 – Comparative overview of impacts and related ratings for the effectiveness and efficiency criteria

Type of impacts	Baseline	A1	A2
Social	• The travel gap (6.3 percentage points) of Persons with disabilities compared to the general population will remain constant • 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	• Reduction of the travel gap for Persons with disabilities: between 1.32 and 1.94 percentage points • Removal of uncertainty related to the access to preferential conditions as all benefits currently offered to residents with disabilities in the 4 sectors covered will be offered also to non-residents with disabilities travelling for short-term stays	• Reduction of the travel gap for Persons with disabilities 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	**Public authorities:** • Cost: The cost of Production and delivery of the EDC: between 1.02 and 4.54 EUR per card for participating Member States. • Cost: Launch of an awareness-raising campaign: between a total of 20,000 and 70,000 EUR. for participating Member States.	**Public authorities**: • Cost: 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 • Cost: Establishment of an IT system for the digital EDC: 1.67 million EUR for the whole EU • Cost: maintenance of an IT	**Public authorities**: • Same costs as A1 as concern production and delivery of the EDC • Benefit: 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 **Persons with disabilities**

	Persons with disabilities: • Cost:Economic loss ranges per short-term trip: between 30 and 140 EUR • Cost: 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)[325] **Service providers:** • Cost:Time delays and extra burdens associated with checking the different national disability cards or certificates to verify the proof of disability status **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)	system for the digital EDC: 249,757 EUR per year for the whole EU • Costs related to request for clarifications received from Persons with disabilities that ask whether some services fall within the four sectors in scope of EDC **Persons with disabilities** • Benefit: Savings for Persons with disabilities 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 at EU level, 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. • Benefit: increased turnover from paying customers travelling with persons with disabilities[326] **Impact on the whole economy** • Value added in the market for accessible tourism: the estimates range from 1.32 to 1.94 billion EUR, increased tax revenues	• Benefit: savings at least the same as A1, but including also preferential conditions present in the extra A2 sectors **Service providers:** • Cost: The estimated direct cost of offering preferential conditions will be the same as or higher than A1 • Benefit: increased turnover from paying customers travelling with persons with disabilities • **Impact on the whole economy** • Value added in the market for accessible tourism: the estimates range from 2.1 to 3.1 billion EUR, increased tax revenue
Environmental	• Negligible impact	• Negligible impact on environmental footprint estimated in a range of 200 to 640 tonnes of CO2 equivalent	• Same as A1

[325] Both short-term and medium trip fall within the short-term stays (up-to 3 months).
[326] In 2012, the DG GROW study on accessible tourism estimated that across the EU countries people with disabilities travel with more companions (on average 2.2 persons) than the elderly population do (on average 1.6 persons).

Administrative costs		• Not expected to entail any substantial administrative costs	• Same as A1
Final rate Effectiveness (see explanation below)	*0*	*2*	*3*
Final rate Efficiency (see explanation below)	*0*	*2*	*3*

Effectiveness

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).

Policy option A1 scores positively on 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 limitation 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.

On the other hand, **policy option A2** would extend the validity of the EDC to all services (with or withoutremunerarion) 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.

Efficiency

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).

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 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. Costs for 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 is expected to lead to beneficial impacts on the whole economy. Indeed, under policy option A1 the value added to the market of accessible tourism is estimated in a range between 1.32 to 1.94 billion EUR.

As concerns **policy option A2**, 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 requests 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;
- 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.

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

Table 2 – Comparative overview of impacts and related ratings for the effectiveness and efficiency criteria

Type of impacts	Baseline	B1	B2
Social	• The level of uncertainty regarding the recognition of national parking cards will remain high	• Negligible reduction of the travel gap for Persons with disabilities	• Removal of the uncertainty regarding the recognition of Persons with disabilities' EU parking card • Reduction of travel gap for Persons with disabilities between 0.27 and 0.4 percentage points
Economic	**Public authorities:** • 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 the EU Parking Cards available across Member States **Persons with disabilities**: • The risk to incur costs related to parking fines	**Public authorities**: In Member States which choose to adhere to updated recommendation: • Benefit:Reduction in the enforcement costs for public authorities due to the enhanced security features of the EU parking card • Cost: 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 • Cost: Serial number connected to a database: € 4	**Public authorities**: • Costs are the same as B1 at national level, but will affect all Member States • • Benefits (i.e. *reduction in the enforcement costs*) are the same as B1 but they will occur in all Member States due to the binding nature of B2 **Persons with disabilities:** • Expected benefits are the same as B1 but they are more likely to happen due to the binding nature of B2

	(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)	• Cost: Establishment and update of national website: range between EUR 7500 and EUR 23000 per Member State **Persons with disabilities** **In Member States which coose to adhere to updated recommendations:** • Benefit: Time savings to obtain information on the mutual recognition of the EU parking card. • Savings of EUR 4/day or EUR 3/hour (different estimates available) (B2 greater than B1) • Reduced risk of potential fines in a range between 90 EUR and 300 EUR **Service providers:** • Negligible value added in the market for accessible tourism	**Impact:** • Value added in the market for accessible tourism: range from 0.2 billion EUR to 0.3 billion EUR, increased tax revenue
Environmental	• Negligible impacts	• 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		• 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*

Effectiveness

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.

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 to 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 to 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

Efficiency

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.

Similarly, **policy option B1** is not expected to lead to benefits that offset the costs incurred by pubic authorities and persons with disabilities.

By contrast, under **policy option B2,** public authorities incur 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).

Table 3 - Comparison of the costs and benefits

	Stakeholders	Persons with disabilities	Service Providers	National Authorities
Policy Area A **Options aimed at facilitating mutual recognition of disability status in the EU in relation to access to services when visiting another Member State** **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**	Benefits	Decreased uncertainty in 4 sectors (culture, leisure, sport and transport) and increase participation in tourism (between 300k and 2 million more) (A2 greater than A1) Direct monetary benefits from preferential conditions (for around 44% of PwD that have been denied preferential conditions when travelling to other Member State according to results of the public consultation) travelling in the	Decreased uncertainty in 4 sectors (culture, leisure, sport and transport) about the validity of national cards and reduction in costs for checking cards/certificates (A2 greater than A1) Increased turnover from paying persons accompanying PwD (such as family and friends). In 2012, the DG GROW study on accessible tourism estimated that across the EU countries people with disabilities travel with more companions (on average 2.2 persons) than the elderly population do (on average 1.6	Increased tax revenue from increased size in the market of accessible tourism (For A1 between 1.5 billion EUR and 1 billion Euro and for A2 between 3.1 billion EURO and 2.1 biullion Euro per year, if travel gap decreases)) Decreased additional administrative burden thanks to decreased number of additional information requests about the validity of the disability cards, provision of preferential conditions, etc. from citizens. Decreased legal uncertainty as concerns the validity of foreign disability cards.

service sectors)		range of EUR 30-120 (if alone) and EUR 80-250 with a PA for trips up to 4 days and up to EUR 100 to 400 per trips up to 2 months (A2 greater or equal A1)	persons). (A2 slightly greater than A1). These persons will be additional clients for the services concerned. Increased size in the market of accessible tourism (For A1 between 1.5 billion EUR and 1 billion Euro and for A2 between 3.1 billion EURO and 2.1 biullion Euro per year, if travel gap decreases	
	Costs	None	Costs of providing the additional preferential conditions to PwD, including preferential conditions in the 4 sectors of option A1 that includes the transport sector and in other sectors for Option A2 illustrated by the costs in the transport sector (between 116 and 161 million EUR, i.e. only 0.05% to 0.08% of (non-air) passenger transport in the whole EU-27) and between 1.7 and 31.2 million EUR at national level, depending on Member States (A2 slightly greater or equal A1) Costs of providing the additional preferential conditions to PwD, including preferential conditions in the 4 sectors of option A1 that includes the transport sector and in other sectors for Option A2 illustrated by the costs in the transport sector (between 0.1 and 1.9	Total implementation costs between roughly 95.000 and 530.000 EUR. Including: I) The one-off cost of establishing the national website ranged roughly between 7,500 and 23,000 EUR, ii) Awareness raising campaigns ranged roughly between 20,000 and 70,000 EUR. (A2 equal to A1) Production and delivery of cards: 1.02-4.54 EUR/card (A2 equal to A1). Digitalisation: 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.

			EUR per capita, up to 0.2 and 3.9 EUR when extended to personal assistants) (A2 greater or equal A1)	
Policy Area B	Benefits	Higher participation in tourism due to decreased uncertainty(B2 greater than B1) Reduced risk of having to pay fines for lack of recognition or having to pay parking spot (savings below 300 EUR per year) (B2 greater than B1) Savings of EUR 4/day or EUR 3/hour (different estimates available) (B2 greater than B1)	Reduced costs of checking the validity of EU parking cards (B2 greater than B1)	Reduction in enforcement costs Reduced costs of checking the validity of EU parking cards (B2 greater than B1). For the preferred option B2 there will be benefits related to tax revenues related to the accessible tourism value added between 0.3 billion EUR and 0.2 billion Euro while the wil not be any change for option B1.
	Costs	None	None	Issuing EU parking cards (costs similar to EDC above)(B2 higher than B1) Setting up national database (B2 equal to B1) Setting up national website (costs similar to EDC above) (B2 equal to B1)

ANNEX 9: POTENTIAL IMPACTS OF THE POLICY OPTIONS ON 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 will vary between 0 and 6.3 percentage points, the latter being the estimated travel gap.

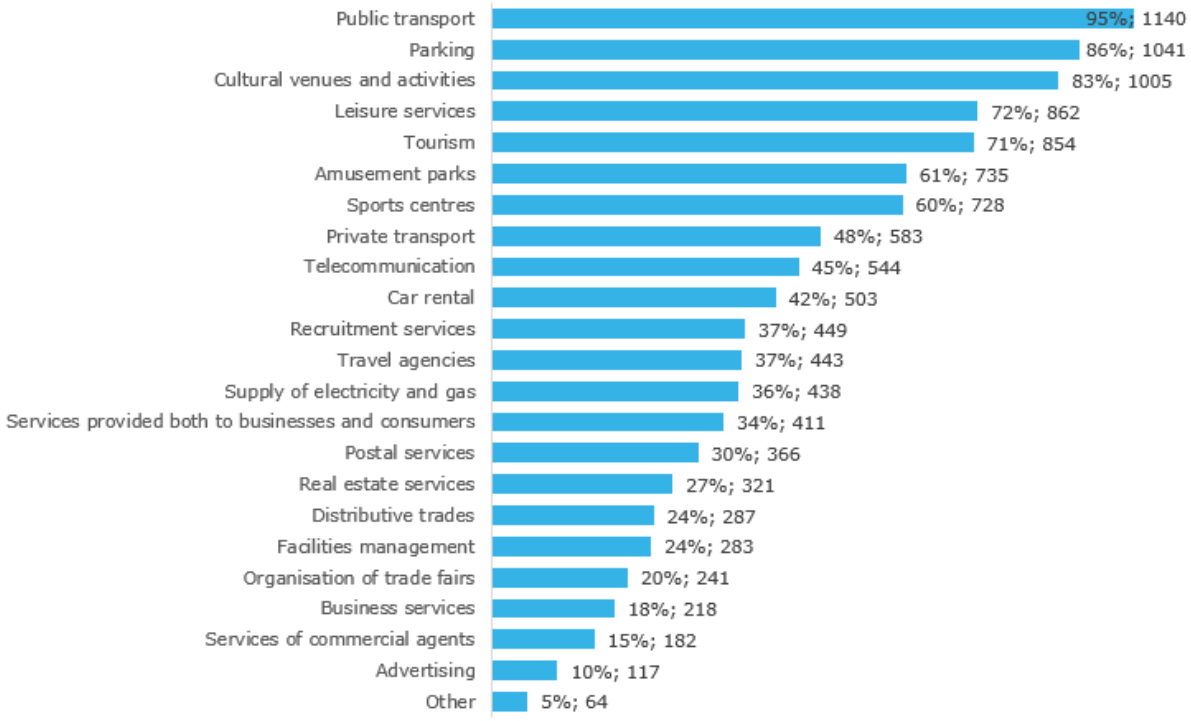
With these assumptions in mind, in order to assess the **potential impact of the policy options on the travel gap**, a specific question from the Public Consultation is used, which asks respondents to assess to what extent the European Disability Card could increase the number of persons with disabilities 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, resulting in a figure of 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 did not provide specific detail on 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, and these included Parking, it is assumed they would expect the policy to include all relevant sectors, with Parking included (A2 + B2). Thus, it is estimated that A2 + B2 could reduce the travel gap by 4.52 percentage points.

Table 1 Distribution of responses in the public consultation to the question "To what extent do you think the European Disability Card could increase 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%

The next step is to distinguish 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 Consultation 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 1 reports the distribution of responses for each sector. To obtain the relative value of each sector, first it must be assumed, in the absence of more detailed information, that if a respondent selected multiple sectors, they attribute the same value to those sectors. With this assumption in mind, the aggregate relative value of sectors covered by 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 * $\underline{1140}$ / (114 + 1041 + 1005 + … + 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 1 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?"



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 cite 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% * 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.[327] 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 covered or not 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.

[327] 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 2 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 – assuming a higher reduction of the travel gap		Scenario 2 – assuming a moderate reduction of the travel gap	
	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

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, given the available data and assumptions made, is expected to be 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:* 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 (could potentially affect up to 32.2 million persons with disabilities, depending on

national rules), which allows to calculate 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 relative to the pilot and 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 this is a conservative approach to the calculation of net benefits.

- *Additional costs:* digital costs, administrative costs, national websites costs and awareness raising costs, totaling up to 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 0.55 billion EUR for A1 and 1.56 billion EUR for A2.

For the policy options in 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 at 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 cost:* costs of the website are included; other costs included in the policy option (such as the database) are assumed to be zero because they 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 net 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 then 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 3 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	