#### \*Organisation name

255 character(s) maximum

Autism-Europe

#### \*Organisation size

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

#### Transparency register number

#### 255 character(s) maximum

Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

#### 396580546242-82

## Privacy settings and data protection

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. Fo r the purpose of transparency, the type of respondent (for example, 'business association, 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published. Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

#### <sup>•</sup>Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

## Anonymous

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 Your name will not be published.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

### Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

I agree with the personal data protection provisions

## **Section A: Problem definition**

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

**Question A1.** In your view, to what extent do the following issues may represent obstacles for persons with disabilities to exercise their free movement right and to profit from benefits or special conditions when accessing certain services?

	Not at all	Small extent	Moderate extent	High extent	Very high extent
<ul> <li>Lack of mutual recognition of disability status and/or national disability cards and certificates</li> </ul>	۲	0	0	0	۲
* Lack of a common EU definition of disability	0	0	0	0	۲
<ul> <li>Lack of common EU card showing the disability status</li> </ul>	۲	0	0	0	۲
<ul> <li>Different treatment of non-residents with disabilities compared to residents with disabilities</li> </ul>	۲	0	0	0	۲
<ul> <li>Limited provision of preferential conditions offered by certain services for non-residents</li> </ul>	0	0	0	0	۲
<ul> <li>Lack of information provided on/for the mutual recognition of the disability status</li> </ul>	0	0	0	0	۲
<ul> <li>Lack of publicly available information on preferential conditions for persons with disabilities</li> </ul>	0	۲	0	۲	۲
Other (Please, specify below)	0	0	0	0	۲

Question A1.1. If you selected "other", please specify

The launch of the European Disability Card is not just a tool needed to improve mobility of persons with disabilities, but an obligation under the UN Convention on the Rights of People with Disabilities – ratified both by the EU itself and by every Member State-, in particular Article 18 (liberty of movement and nationality).

The lack of mutual recognition of autism diagnosis and disability status across Europe prevents autistic people and their families from fully exercising their freedom of movement. Autistic people across Europe commonly face lengthy delays to access diagnostic services and, in turn have their disability status recognised. It is thus very challenging to travel/ move abroad and to have to go through the diagnosis process and disability assessment again as it is currently the case. They can thus not fully enjoy their rights as EU citizens. Persons with disabilities currently do not enjoy the same opportunities to travel, study, or move abroad for work, it is for example reflected in the low employment and student mobility rate, together with the tourism rates, of persons with disabilities.

\* **Question A2.** Have you ever moved (to reside) an EU country other than the country of your origin / residence?

- Yes
- No

\* **Question A3.** Have you ever travelled to other Member States as tourist or for other purposes for less than 3 months?

- Yes
- No

\* **Question A4.** In your view, to what extent are persons with disabilities discouraged to travel abroad because their disability status (or document to prove it) is not fully recognised in other Member States?

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

\* **Question A5.** Have you ever been personally or are you aware of a person with disabilities who has had his/her national disability status not recognised in other Member States?

Yes

No

Question A5.1. If you selected "yes", please specify

Yes, Autism-Europe is regularly contacted by autistic people and their families who are faced with a lack of recognition of their autism diagnosis and disability status when moving to other EU member states. Disparities in autism definitions across the EU Member States and their medical approach trigger inequalities in the recognition of disability-specific and individual needs of autistic people and in the provision of appropriate intervention and quality support services across the EU Member States. The lack of portability of their disability allowances prevent autistic people and their families to access

support in other member states and prevent them from exercising their freedom of movement.

**Question A6.** According to your knowledge, in which of the following sectors do persons with disabilities from other Member States (non-residents visiting for less than 3 months) have same access to preferential conditions (discounts, special prices, priority, other) as residents with disabilities of your country or the country where your organisation is based? (Multiple choices)

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

### \*Question A6.1. If you selected "other", please specify

n/a

# **Question A7.** What are the most frequent preferential conditions/ benefits that persons with disabilities get?

	In your country/the country where your organisation is based	In other EU Member States
Free entrance for the person with disabilities		V
Price reduction for the person with disabilities		
Free entrance for the person with disabilities and her/his assistant or accompanying person		
Price reduction for the person with disabilities and her/his assistant or accompanying person		
Priority in access to venues, in queues		
Assistance in terms of personal support or assistive technology (wheelchairs, etc.)		
Other	V	

### Question A7.1. If you selected "other", please specify

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

\* **Question A8.** In your view, to what extent are persons with disabilities discouraged to travel abroad or consider they cannot fully exercise their rights because of barriers or difficulties related to their recognition of disability status?

Not at all

- Small extent
- Moderate extent

- High extent
- Very high extent

\* **Question A9.** In your view, to what extent are persons with disabilities disadvantaged in travel abroad because of lack of access to preferential conditions offered to nationals with disabilities when accessing certain services?

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

\* **Question A10.** Have you ever been personally or are you aware of a person with disabilities who has been denied access to preferential conditions, offered to nationals with disabilities, when accessing certain services in other Member States?

- Yes
- No

Question A10.1. If you selected "yes", please specify

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

Question A10.2. If yes, can you estimate what was your financial loss if any?

\* Question A10.3. If yes, have you decided to use the services despite that?

- Yes
- No

## Section B: Your views on the EU parking card

\*Question B1. Are you aware of the EU parking card for persons with disabilities?

- Yes
- 🔍 No

**Question B2.** If you have an EU parking card for persons with disabilities, do you make use of it?

- Yes, I use it in my country
- Yes, I use it in other Member States
- <sup>II</sup> Yes, I use it both in my country and in other Member States
- No, I do not use it
- N.A.

\* **Question B3.** To what extent do you think that the EU parking card facilitates the mobility of persons with disabilities?

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

**Question B4.** To what extent do you think that the following issues hinder the implementation of the EU parking card?

	Not at all	Small extent	Moderate extent	High extent	Very high extent
<ul> <li>Differences across Member States in terms of conditions attached to the card (e.g. validity period, conditions for priority parking, etc.)</li> </ul>	0	0	0	0	۲
* Differences in the card design across the Member States	0	0	0	0	۲
<ul> <li>Limited recognition of the card (issued by national or local authorities) across Member States</li> </ul>	۲	0	۲	0	۲
* Limited use of the card across Member State	0	0	۲	0	۲
* Possible fraudulent use of the card	0	0	۲	0	0
* Possible forgery of the card	۲	0	۲	0	۲

\* **Question B5.** Do you think that a single EU model parking card should be compulsory in the EU?

- Yes
- No

## Section C: The need for EU action

**Question C1.** To what extent do you agree that the EU action is needed to achieve the following objectives?

	Not at all	Small extent	Moderate extent	High extent	Very high extent
<ul> <li>Facilitate mutual recognition of disability among Member States</li> </ul>	۲	0	0	0	۲
<ul> <li>Facilitate access to those services offering preferential conditions for persons with disabilities in all Member States</li> </ul>	0	0	0	0	۲
<ul> <li>Improve the implementation of the EU Parking card for persons with disabilities</li> </ul>		0	0	0	۲

\* Question C2. 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? (<u>Mu</u>

## **Itiple choices)**

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

- Real estate services
- Distributive trades
- Organisation of trade fairs
- Other

### \* Question C2.1. If you selected "other", please specify

All the services, discounts, benefits and support already granted to nationals with disabilities should be granted to persons with disabilities from other Member States. When the person with disabilities moves to study or because of a work contract, they should have access to the same support as nationals with disabilities in order to work or to study on equal footing with others.

## Section D: Possible policy options

**Question D1.** To what extent do you expect that the European Disability Card would increase your own travelling to other EU Member States?

- Not at all
- Small extent
- Moderate extent
- High extent
- Very high extent
- <sup>©</sup> N.A.

**Question D2.** To what extent would you agree with the following statements concerning the mechanisms to obtain the European Disability Card?

	Not at all	Small extent	Moderate extent	High extent	Very high extent
<ul> <li>Holders of a national disability card/certificate should automatically obtain the European Disability Card</li> </ul>	O	0	۲	0	0
<ul> <li>Holders of a national disability card/certificate should obtain the European Disability Card upon request without any additional examinations</li> </ul>	0	0	0	0	۲
<ul> <li>Holders of a EU parking card for persons with disabilities should automatically obtain the European Disability Card</li> </ul>	0	0	0	0	۲
Other	۲	0	0	0	۲

Question D2.1. If you selected "other", please specify

The use of the European Disability Card must be voluntary, persons with a disability can decide if they want to apply for the card.

However, potential users (i.e. holders of national disability card) must receive direct, easy-to-understand information about how to obtain the card, and its benefits. Otherwise, there is a risk that people who struggle to claim their rights remain excluded from the scheme.

The European Disability Card initiative must also include an EU-level website that provides practical details for every country, such as where to get the card and how it works. The EU website should be available in every language and accessible, with easy-to-read formats and sign language availability, as should the national websites and the full process of acquiring the card.

An autism diagnosis should give you the right to obtain European Disability Card and EU parking card, and it should be mutually recognized across the EU

\* **Question D3.** Do you think that the European Disability Card should be free of charge?

- Yes
- No

\*Question D4. What format do you think the European Disability Card should have? (Multiple choices)

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

\* **Question D5.** Do you think that a possible common format of a European Disability Card should include the following features? (<u>Multiple choices</u>)

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

\* **Question D6.** Do you think that a common format of a European Disability Card would facilitate mutual recognition of disability status and travel among the Member States?

- Yes
- No

**Question D7.** Do you think that the European Disability Card should be introduced in all the Member States on a mandatory basis?

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

\* **Question D8.** To what extent do you agree or disagree that the EU parking card should be incorporated in the new European Disability Card?

- Strongly agree
- Agree
- Disagree
- Strongly disagree

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

**Question E1.** To what extent do you think the European Disability Card could have the following impacts?

	Not at all	Small extent	Moderate extent	High extent	Very high extent
<ul> <li>Increasing the number of persons with disabilities travelling in the EU</li> </ul>	0	0	0	0	۲
<ul> <li>Increasing the number of persons with disabilities moving to another Member State</li> </ul>	0	0	0	0	۲
<ul> <li>Increasing how often persons with disabilities travel in the EU</li> </ul>	0	0	0	0	۲
<ul> <li>Increasing the length of stays of persons with disabilities when travelling in the EU</li> </ul>	0	0	0	0	۲
<ul> <li>Increasing the opportunity for persons with disabilities to exercise fully their right of travelling across the EU</li> </ul>	0	0	0	0	۲
<ul> <li>Increase access to services offering preferential conditions for persons with disabilities when travelling in the EU</li> </ul>	0	0	0	0	۲

<ul> <li>Increasing the take up of cultural, leisure, sports, and travel services of persons with disabilities when travelling across the EU</li> </ul>		۲	0	0	۲
<ul> <li>Increasing the digital skills of persons with disabilities (e.g. reduction of the digital gap, greater use of digital services, etc.)</li> </ul>	0	0	۲	0	0
<ul> <li>Simplifying mutual recognition of preferential conditions for persons with disabilities</li> </ul>	0	۲	0	۲	۲
* Reducing the offer of preferential conditions for accessing certain services	۲	۲	0	۲	0
Other	0	0	0	0	۲

### Question E1.1. If you selected "other", please specify

The card would give autistic people a tool to access services and goods without having to explain their invisible disability. This is especially true in Member States that currently do not have a national Disability Card. The pilot program has demonstrated that benefits outweighed the costs as service providers had positive economic returns. The accessibility of services for people with disabilities has improved. Overall, the pilot card has facilitated the recognition of disabilities by service providers.

Finally, we also expect that a European Disability Card will have an impact on the common European identity with the card being a visual representation of the rights that the EU gives to persons with disabilities in their daily lives. The card will be a tangible reminder in everyone's pocket that the EU brings benefits to EU citizens with disabilities.

# **Question E2.** In which area or direction do you think that the European Disability Card could affect the following costs?

	Substantially decrease	Slightly decrease	No impact	Slightly increase	Substantially increase
<ul> <li>Regulatory charges (e.g. fees, levies and taxes, etc.)</li> </ul>	0	0	۲	0	0
<ul> <li>Adjustment costs (e.g. cost of implementing the card, cost of equipment)</li> </ul>	O	0	0	۲	۲
<ul> <li>Administrative costs of monitoring (e.g. keep track of card use etc.)</li> </ul>	0	0	0	۲	0
<ul> <li>Administrative costs of reporting (e.g. storing information, holding databases etc.)</li> </ul>	0	0	O	۲	0
<ul> <li>* Enforcement costs (e.g. inspections, handling complaints, forgery control)</li> </ul>	۲	0	۲	0	۲
*					

Indirect costs (e.g. price increases for the general public for services targeted by the card)	O	0	۲	0	۲
Other	O	0	۲	0	۲

### Question E2.1. If you selected "other", please specify

There may be a slight increase of costs at least in the beginning while the Card system is being set up. But the costs of implementing the Card are not to be considered, as it is an obligation under the EU Treaties and the UNCRPD, and because often it can be combined with the systems in place for the national disability cards. Moreover, the simplification of procedures in countries without a disability card (where documentation of disability assessment is the only proof) would mean a reduction of costs covering the cost of implementing the EU Disability Card, if any.

Furthermore, it is to be expected that the increase in travel and tourism will offset the slight increase of costs to launch the Card. Besides this, the Commission should provide a funding instrument to set up the European Disability Card in all EU Member States, including an EU-wide website. Afterwards, continued funding for the printing and issuing of the card, staff, communication and maintenance of the website and related tools.

AE acknowledges that financial EU backing is necessary for the long-term success of the initiative but the freedom of movement and increased accessibility across sectors ensures that EU citizens' rights are upheld while also having the potential to boost the economy.

# **Question E3.** To what extent do you think that the costs entailed by the European Disability Card would affect the following stakeholders?

	Not at all	Small extent	Moderate extent	High extent	Very high extent
* Member States' public administrations (e.g. costs related to the delivery of the Card)		۲	0	0	0
* Public authorities offering preferential conditions for persons with disabilities	۲	0	0	0	0
<ul> <li>Private sector businesses – Large companies (e.g. costs related to the provision of preferential conditions to EU tourists with disabilities)</li> </ul>	۲	0	0	0	0
<ul> <li>Private sector businesses – SMEs (e.g. costs related to the provision of preferential conditions to EU tourists with disabilities)</li> </ul>	۲	0	0	0	0
* Cultural venues and institutions	۲	0	0	0	0
* Civil society organisations (e.g. costs related to the provision of support in using the Card to Card holders with particular needs)	۲	0	0	0	0

**Question E4.** To what extent do you think the costs entailed by the European Disability Card would affect your company / organisation (costs related to individual services, etc.)?

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

**Question E5.** To what extent do you agree that the integration of the European Disability Card and the EU Parking Card would lead to the following impacts?

	Not at all	Small extent	Moderate extent	High extent	Very high extent
<ul> <li>Reducing costs for producing and delivering the Card</li> </ul>	۲	0	0	0	0
* Simplifying application procedures	۲	0	0	0	0
* Increasing awareness/visibility of the Card	۲	0	0	0	0
* Increasing the uptake of the Card	۲	0	0	0	0
<ul> <li>Reducing risk of fraud and forgery of the Card</li> </ul>	۲	0	۲	0	0

## Section F: Concluding remarks

# **Question F1.** If you wish to add further information — within the scope of this consultation — please feel free to do so here.

The European Disability Card should be established through a Regulation, applicable in all Member States in a rapid, effective and homogeneous manner. A Regulation is a more appropriate instrument to ensure agility in the application and to avoid differences in implementation at national level. The legislation cannot be a recommendation, as that would not allow for the card to have universal and homogeneous applicability. In the case of a Directive, there would be room for interpretation at national level in the transposition, with potential situations where European Disability Cards have an active status in some Member States but other EU countries do not have proper legislation to enforce it. A Regulation would have an immediate effect in every Member State.

- Regarding the coverage, the European Disability Card should grant access to all forms of services, benefits and discounts already granted at national level for users of national disability cards or equivalents, accepted by all services offering preferential conditions or adaptations to persons with disabilities, whether provided by public or private entities. Hence, the legislation should not set a limited list of sectors but apply to all services of the EU single market, as a listing would entail many exceptions, maintaining most of the current obstacles and limiting its effectiveness.

- The development of the new legislation for the EU Parking Card, launched simultaneously as the proposal for a European Disability Card is welcomed. In this regard, we believe binding legislation should also be the instrument, given the limits the Council Recommendation from 1998 has shown. It must also be taken into account that both cards must remain physically separate in all cases. Not all persons with disabilities who are potential holders of the disability cards also drive a vehicle and, for practical reasons, the parking card has to stay in the parked vehicle, while the European Disability Card should be carried by the user.

- It would be important to have public awareness campaigns for the European Disability Card and the EU parking card, highlighting invisible disabilities.

# **Question F2.** Please feel free to upload a concise document, such as a position paper

The maximum file size is 1MB. Please note that the uploaded document will be published alongside your response to the questionnaire, which is the essential input to this public consultation. The document is optional and serves as additional background reading to better understand your position. Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

#### **Background Documents**

- ВG достъпната версия във формат Word
- CS formtu Word
- DA Word-version
- DE barrierefreie Word-Fassung
- EL ά έ Word
- EN Accessible Word Version
- ES Versin accesible en Word
- ET Wordi versioon
- FI Word-muodossa
- GA leagan Word
- HR verziju u Wordu
- HU Word formtum
- IT versione Word
- LT Word formatu
- LV Word versiju
- MT I-verżjoni aċċessibbli tal-Word
- NL Word-versie
- PL formacie Word
- PT verso em Word
- RO versiunea Word accesibilă

SK - verziu vo formte Word

SL - dostopno različico v Wordu

SV - Word-enkten

Contact

EMPL-DISABILITY-CARD@ec.europa.eu