

# Autism-Europe's response to Commission's call for evidence on the EU Disability Card

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Position paper – December 2022

## Introduction

Autism-Europe (AE), an international association representing autistic people and their families with 90 members in 40 countries, welcomes the EU Disability Card. This flagship initiative of the Strategy for the Rights of Persons with Disabilities 2021-2030 is a key instrument to address the lack of mutual recognition of disability status across the European Union (EU). It impedes people with disabilities from traveling or moving to other EU Member States and thus from enjoying their freedom of movement.

The EU Disability Card has the potential to foster positive change. To ensure a harmonised approach throughout the EU, Autism-Europe believes that the EU Disability Card must be implemented through binding EU legislation. The card should be enforced by all EU Member States and accepted by all services offering preferential conditions or adaptations to persons with disabilities, whether provided by public or private entities. It means that the legislation should not set a limited list of sectors. The card would give especially autistic people a tool to access services and goods without having to explain their invisible disability. 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.

## Evidence of the benefits of the EU Disability Card

The 2021 Commission feasibility study found the EU Disability Card to be effective. The pilot card scheme has introduced a mutual recognition of disability status across the participating EU Member States. The participating service providers recognised the EU Disability Card as an official document attesting to the disability status of persons with disabilities. It is particularly relevant for people with **invisible disabilities**, as the EU Commission study suggests. Indeed, there must be more awareness of invisible disabilities across sectors. It is equally critical that people with invisible disabilities can easily prove their disability without hassle and long explanation.

*Nowadays, 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 move abroad and to have to go through the diagnosis process and disability assessment again as is currently the case. Therefore the EU Disability Card should give access temporarily to public social entitlements associated with a disability when the disabled person moves to another Member State to study or to work, while the person with a disability gets their disability re-assessed and certified.

In some instances, it is vital to alert and inform those interacting with autistic people so that they can receive reasonable accommodation for their disability and their co-occurring conditions. As demonstrated during the COVID-19 pandemic, autistic people and their families are particularly in need of tailored support measures, such as in the health sector. Over the years, many examples of autism cards that facilitate communication and reasonable accommodations have been introduced by autism organisations across Europe. For example, the Autism Spectrum Information Advice & Meeting Point (Aslam), Autism-Europe's member association from **Ireland**, delivered the Aslam Autism ID. The objective is also for the card to be of use outside of Ireland. Thus, for better recognition abroad the Aslam Autism ID Card also features the logo of **Autism-Europe**.

### Key recommendations

Based on this evidence, as well as from other experiences of the autistic and larger disability communities and in line with the European Disability Forum (EDF), Autism-Europe strongly supports an EU disability card and recommends that:

- The EU Disability Card should be based on binding legislation, preferably a Regulation to ensure a harmonised implementation across EU member states
- The EU Disability card should apply to all areas of services and supports already provided for national citizens with disabilities
- The EU Disability Card format should be fully accessible, have a standardised size (e.g. bank card format) and the possibility to be connected to a digital interface

It is also essential to promote awareness of the EU Disability Card amongst all stakeholders. An EU-level website must be set up in all official EU languages with practical details for every EU Member State regarding:

- where to get EU Disability Card
- how EU Disability Card works
- scope of benefits associated with the card

However, the use of the EU Disability Card by disabled people must remain voluntary and having a Card must not be an obligation to prove disability.

To support the implementation of the EU Disability Card scheme, it is necessary to:

- Dedicate adequate funding for setting-up the EU Disability Card, its EU-level website and for addressing continuous operational needs.
- Ensure close collaboration with persons with disabilities, their families their families, and their representative associations for the development and implementation of the EU Disability Card.