European Disability Card Submission

# Introduction

The European Commission announced that, by the end of 2023, it will propose an EU-wide Disability Card (EDC), as an instrument of mutual recognition of the disability status, building on the experience of the ongoing pilot project as well as on that of the European parking card for persons with disabilities.

NCBI acknowledges the concept of the European Disability Card Initiative based on the experience of people who had encountered problems in being recognised as disabled when travelling to other EU Member States. NCBI welcomes the opportunity to participate in this Public Consultation, and to address accessibility needs for people who are blind or vision impaired.

# Concept of European Disability Card: In line with UNCRPD

The United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) is an international human rights treaty, which exists to promote, protect, and ensure the full and equal enjoyment of all human rights and fundamental freedoms by all people with disabilities. [[1]](#footnote-2)

A European approach to the introduction of a Disability Card would have the potential to ensure relevant legislation for the recognition and the effectiveness of equitable access to travel and benefits such as access to transport, sport, and leisure activities. The concept of the European Disability Card envelops the ambition of the UNCRPD, however the practicality and scope of EDC to ensure a uniform and accessible experience for people with disabilities (including people who are blind or vision impaired) has yet to be realised across the European Union.

# European Disability Card in practice: Could it achieve the desired outcome?

The European Disability Card was designed on the principle of mutual recognition. This means that each participating Member States recognises the Disability Card from the other Member States even if the Card is issued according to the regulations of the home Member State.

NCBI concurs with the potential anomalies of the EDC highlighted from feedback from the European Blind Union (EBU) and the European Disability Forum (EDF) indicated below.

Although the concept of ease of travel for people with disabilities across Europe is appealing, the practicality of the scope of the card may be limited. This is because Member States can retain discretionary decision-making. This means access to services such as leisure or sport may vary from country to country. [[2]](#footnote-3) The question remains whether the availability of preferential services to visitors with disabilities will be guaranteed in host Member States. This uncertainty may result in people with disabilities having an additional burden of checking availability in advance of travel.

Furthermore, the EDC appears to have an Expiry Date and while this is understandable in some instances, for those with life-long disabilities, it is an additional and unnecessary burden to have to continuously reapply and provide evidence of their disability. [[3]](#footnote-4)

# Alignment of EDC with the European Parking Card

To ensure that parking facilities reserved for people with disabilities are available across Europe, the European Parking Card was designed. The European Commission has also proposed alignment of the European Parking card with the European Disability Card. However, the European Parking Card does not appear to be standardised across Member States, indicated by varying formats. [[4]](#footnote-5) It remains unclear whether the absence of standard European Parking Card format poses potential difficulties in accessing designated parking spaces for people with disabilities visiting host Member States.

NCBI believes that the standardisation of both the European Disability Card and the European Parking Card would be paramount to ensure an effective method of ease of travel and uniform access to benefits for people with disabilities. Fundamentally, the progress of the development of the EDC in alignment with the European Parking Card would require robust negotiation between the Legislative Representatives of Member States and engagement and support of international Non-Governmental Organisations (NGO’s), for example EDF and EBU.

# European Disability Card: The Perspective for people who are blind or vision impaired

Accessing information remains a significant challenge for people who are blind or vision impaired. Therefore, the scope of the EDC could potentially be expanded to address accessible formats for information e.g. Braille, Large Print, Digitally Accessible forms/documentation for people living with sight loss.

When designing the Card for the pilot projects, attention was paid to include Braille to identify the Card easily and improve accessible use of the EDC. However, NCBI would argue that including other accessible formats would be very beneficial. For example, the EDC should have a tactile surface or indicator.

Additionally, NCBI believes it is important to ensure the availability of a digital card that could be stored on a person's phone would also be of benefit. Italy has indicated a commitment to developing a digital format.[[5]](#footnote-6) It is imperative that all digital cards and apps are fully compliant with the WCAG 2.1 AA standards to ensure full accessibility for people who are blind or vision impaired. Moreover, highlighting accessibility of the national websites where preferential services can be checked on the Card would be of paramount importance for people living with sight loss. While the EU Web Accessibility Directive is in place, there are many national websites and apps that remain inaccessible, and this must be addressed if the benefits afforded through the card are to be accessed by people living with sight loss.

Another important means of accessibility for people who are blind or vision impaired is the assistance of Guide Dogs and other mobility aids such as white canes etc. Guide Dog users and those who use other mobility aids should also be considered within the benefits of the EDC. Access to leisure, sport, culture and transport should allow entry to guide dogs and those using any other mobility aid.

# European Disability Card: Potential expansion of the range of use

NCBI believes there is a value in exploring if the EDC range of uses could include eligibility assistance in other everyday activities. NCBI is aware of a variety of issues that people with sight loss face when trying to access everyday services such as banking, shopping and ordering in cafes and restaurants. Expanding the use of the EDC may help reduce the challenges people experience due to inaccessible systems and processes and improve the experience of their visit to the host Member State.

# Conclusion and recommendations

NCBI supports the development and introduction of the European Disability Card for use for all people living with disabilities. The benefits of European Disability Card accepted in all European Member States has the potential to ensure ease of travel for people with disabilities without the need to prove or explaining their disability to staff on public transport or when entering leisure activities.

NCBI recognises the potential of the EDC and makes the following recommendations:

1. Ensure that the principles of mutual recognition and equality between all European citizens are embedded in the concept of the EDC.
2. Ensure that the EDC is accessible to all people with disabilities including those who are blind or vision impaired, by using accessible formats such as digital formats, tactile surfaces and the use of Braille.
3. Increase the scope of the EDC to people with disabilities to other everyday activities e.g. banking, shopping etc.
4. Ensure that the EDC preferential benefits are equitable across Europe for everyone living with disabilities in all Member States.
5. Robust negotiation between Legislative Representatives of Member States and engagement and support of international NGOs, such as the EDF and EBU.
6. NCBI supports the EBU call on stakeholders at EU and national level, lawmakers as well as civil society organisations, to encourage the development of the EU Disability Card initiative, to establish an all-Europe scheme of recognition of disability for equal access to related services.
7. NCBI emphasises that the EDC would be in keeping with Universal Design to facilitate every person with disabilities across Europe. This standardisation would ensure freedom of access and underpin the UNCRPD stand.

1. United Nations Convention on the Rights of Persons with Disabilities. <https://nda.ie/disability-policy/uncrpd> [↑](#footnote-ref-2)
2. # Antoine Fobe, “The EU Disability Card”, EBU Focus Number thirteen, June 2021. <https://www.euroblind.org/newsletter/ebu-focus-english>

   [↑](#footnote-ref-3)
3. Maria Kyriacou, “Feedback from the EU Disability Card Pilot Project”. <https://www.euroblind.org/newsletter/ebu-focus-english/2021/june/en> [↑](#footnote-ref-4)
4. European Commission Call for Evidence for an Impact Assessment on European Disability Card. Ref. Ares(2022)8094054 - 23/11/2022 [↑](#footnote-ref-5)
5. Marie Denninghaus, EDF position on the European Disability Card 2022. European Disability Forum Position Paper. May 2022 [↑](#footnote-ref-6)