BDF Reply to Feedback of EC - [EU pagina](https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13517-European-disability-card_en#:~:text=The%20Commission%20would,social%20media%20account.)

The EDC is a 'descendant' of the proposal of the Belgian Disability Forum (BDF) for the development of a European disability card dating from 2009. The current Commission proposal therefore almost fully meets the requirements set at the time. Thus, the BDF and all the disability advisory councils in Belgium are very pleased to welcome the proposal!

Several points could have been more prominent and/or elaborated in the proposal:

1. That the EDC is **free and voluntary to use**. The EDC has a purely declarative function and may not be used as a condition on the merits to make use of certain special conditions or to rely on reasonable accommodations.
There are also many people with disabilities within the meaning of art. 1 UNCRPD whose disability is not recognized; they should not experience any disadvantages when introducing the EDC.
2. BDF supports the EDF's call to extend the personal scope of application to **third-country nationals who have a legitimate residence permit** in a Member State and whose disability is recognized in that Member State of residence.
3. The awareness campaign and information obligation rests entirely with the Member States. Given that the aim of the EDC is to facilitate the free movement of people with disabilities, there should be a greater role for the European Commission. Moreover, parking rules differ among member states and even among regions. In Belgium for instance, it is difficult for national citizens to know what is allowed and on which conditions, let alone foreign citizens visiting Belgium. There is a **need for an EU website** that contains the necessary information and, most importantly, which refers to national websites that at least list the excluded services. In this context, see also the requirement of the European Disability Forum (EDF). The fact that **complaints may arise** about the use of the EDC, or the EPC also justifies the need for an EU website. In this way, a **centralized platform for complaints handling** can be set up and the 'traveling' EU citizen does not have to unnecessarily look for the correct authority.
4. Considering the broad scope of application of the EDC, it is important to **list the exceptions on the websites**. Every cardholder must know unequivocally what they are entitled to. This is necessary to ensure legal certainty as a principle of good administration.
5. It is not clear how the EDC can be used for **preferential conditions associated with a certain type/degree of disability**. However, also those preferential conditions should in principle be made available to not-Belgian citizens. **Member States** **cannot start to roll back certain preferential conditions** **because it becomes too difficult to make them available to EU citizens other than their own nationals**!
6. There are also certain **preferential conditions associated with a residence requirement**, would the exclusion of non-Belgian nationals amount to indirect discrimination in the EU context?
7. Regarding the validity of the cards, it is good that the date of the expiry is mentioned on the cards, however consideration should be given at EU level to the **use of a QR code** that, when scanned, shows whether the card is still valid or not. (It is up to the member states to decide what is best, but consideration should be given to the specific problems related to scan cars and low emission zones).
8. The proposal states about the EPC that “***where the card is associated to a vehicle its number plate shall be visible*.”** The BDF maintains that an EPC is linked to the person with the disability and not to a specific car. An EPC-holder can use several cars (own car, riding with a volunteer…). In Belgium you must register a number plate to the EPC so that scan cars that control the parking rights would not issue a retribution. **So, there is always a number plate linked to an EPC**. Hence, it is not possible to sum up all the possible number plates linked at a certain time to the EPC. Moreover, even a car owner may change its car or use another car sometimes, so the plate on the EPC would only cause confusion in that case. **The BDF asks to remove that requirement from the EPC**.