098351/EU XXVIII. GP
Eingelangt am 16/10/26

Council of the European Union

Brussels, 16 October 2026
(OR. en)

14417/1/26
REV 1

SOC 658
EMPL 382
ANTIDISCRIM 95

NOTE

From:	General Secretariat of the Council
To:	Delegations
Subject:	AOB for the meeting of the EPSCO Council of 19 October 2026: European Disability Card and European Parking Card for persons with disabilities – Overcoming challenges in the implementation process and addressing QR code colour requirements and interoperability *- Information from Italy, Belgium, Estonia, Finland, Lithuania, the Netherlands and Slovakia*

Delegations will find attached information from Italy, Belgium, Estonia, Finland, Lithuania, the Netherlands and Slovakia on the above, with a view to the EPSCO Council of 19 October 2026 (Any Other Business item).

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ANNEX

European Disability Card and European Parking Card for persons with disabilities – Overcoming challenges in the implementation process and addressing QR code colour requirements and interoperability

Information from Italy, Belgium, Estonia, Finland, Lithuania, Netherlands and Slovakia

Directive (EU) 2024/2841 establishing the European Disability Card and the European Parking Card represents an important step towards facilitating the free movement of persons with disabilities through the mutual recognition of the European cards and equal access to special conditions and preferential treatment across Member States.

The successful implementation of this framework requires that both cards be secure, accessible, sustainable, durable and fully interoperable across Member States. It is therefore essential that the relevant technical specifications ensure minimum common standards while preserving sufficient flexibility and adaptation regarding certain specifications and the technologies used for card production.

These include, inter alia, the colour of the QR code and its compatibility with secure production technologies; the dimensions and materials; accessibility requirements, including the use of Braille; the situation of public bodies or institutions managing parking cards; and certain aspects concerning interoperability, electronic verification and revocation procedures.

During the ongoing process of verifying the prescribed requirements and assessing their practical implementation in each Member State, a need for targeted adjustments to certain technical aspects has emerged to ensure the effective, efficient and timely production and use of the cards across EU.

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In this context, Italy, Belgium, Estonia, Finland, Lithuania, Netherlands and Slovakia, while underlying the need for the Commission to undertake a comprehensive assessment of all requirements and technical aspects that have been identified as areas of concern, wish to draw attention, in particular and urgently to the QR code colour requirements set out in the Directive 2024/2841 which prescribe the use of dark blue according to specific chromatic parameters.

While recognizing the importance of harmonized technical specifications, the exclusive use of a specific colour may create unnecessary technical constraints, particularly where secure card production relies on laser engraving on polycarbonate substrates, which the Commission itself has acknowledged as an appropriate material that would effectively protect against forgery and falsification. This widely used technology produces durable, tamper-resistant monochromatic markings, typically in black, which cannot readily be reproduced in a prescribed colour.

From a functional perspective, QR code readability and reliability depend primarily on adequate contrast, geometric integrity and compliance with relevant technical standards, rather than on a particular colour. Black QR codes can therefore provide the required levels of readability, security and interoperability.

This would not undermine the harmonized appearance or the common European identity of the cards; on the contrary, it would ensure that harmonization focuses on the essential functional characteristics of the QR codes, without imposing unnecessary restrictions on the production technologies available to Member States.

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Concerning the EPC, several Member States have identified implementation difficulties relating to its non-standard dimensions, which require dedicated printing equipment and may delay production and issuance. Furthermore, the current specifications do not accommodate EPCs issued to institutions providing care for persons with disabilities. Greater flexibility, including the possibility of using standard ISO dimensions, and the possibility of identifying institutions through the existing data fields would help overcome these obstacles.

Such flexibility would also help prevent unnecessary implementation difficulties and delays in issuing the cards, thereby supporting the effective exercise of the rights of persons with disabilities to mobility and inclusion across the Union, which remain a shared priority for the Union and Member States.

Against this background, Italy, Belgium, Estonia, Finland, Lithuania, Netherlands and Slovakia call the European Commission to identify practical solutions that preserves common European standards while addressing the above-mentioned difficulties, facilitating the effective and timely implementation of both cards, and ensuring that the applicable technical framework explicitly allows QR codes to be produced and retained in black, as an alternative to dark blue, without requiring their replacement or conversion, provided that common standards of readability, contrast, security and interoperability are respected.

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