Rapid introduction of the ESSPass – digital A1 procedures for easier mobility

Position paper on the European Commission's planned regulation for a European Social Security Pass (ESSPass)

This document has been machine-translated from German. The original German version is available here.

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Summary

The digitisation of social security coordination is long overdue. For decades, companies have been burdened with paper-based bureaucracy and fragmented procedures that unnecessarily complicate cross-border mobility and hamper competitiveness in the internal market. Labour mobility must be simplified as a fundamental freedom in the internal market.

With the ESSPass and the European Digital Identity Wallet (EUDI Wallet), digital tools are finally available that promise to genuinely ease the burden on businesses, for example in the A1 procedure – provided they are introduced quickly, bindingly and in all Member States. But digitalisation alone is not enough: at the same time, the A1 bureaucracy for short-term stays must be legally dismantled.

Consistent, EU-wide implementation with clear deadlines before the end of this decade is essential in order to effectively relieve the burden on companies and sustainably strengthen cross-border activities in the internal market.

In detail

Modernising social security coordination

The ESSPass is an important step towards simpler, digital procedures under Regulation (EC) No 883/2004 and must be introduced quickly. It enables real-time cross-border verification of key social security documents such as the A1 certificate or the European Health Insurance Card (EHIC), thereby making an important contribution to the digital coordination of social security in the EU.

An ambitious timetable, a robust IT infrastructure and sufficient funding are crucial to ensure that the ESSPass can be used in practice before the end of this decade.

As long as A1 certificates are predominantly issued as simple PDF documents without EU-wide uniform online verification, their authenticity and validity remain difficult to verify in practice. This leads to unnecessarily time-consuming checks and enables errors and abuse.

The ESSPass must be established as a uniform, EU-wide recognized verification tool for inspections. National special approaches or additional proof requirements for companies must not exist where digital verification via the ESSPass is possible.

At the same time, the ESSPass can help to prevent misuse and forgery. The fight against fraud must remain proportionate and must not place an additional burden on law-abiding companies. Proportionate data protection, national competences and clear responsibilities must be fully respected.

The issuing authorities are responsible for the accuracy, timeliness and availability of the data. Companies must not be held liable for technical errors, system failures or delayed updates.

Abolish A1 bureaucracy

The complete elimination of unnecessary A1 bureaucracy for short assignments must be a priority alongside digitalisation. Business trips, short-term and last-minute postings, and emergency assignments within the internal market must be completely exempt from the A1 certificate requirement, with the exception of the construction industry, as they do not usually trigger a change in the applicable social security law. This disproportionate bureaucracy places a burden on companies without any discernible added value and hinders mobility within the internal market.

Building on the ESSPass, the next step is to establish a uniform, digital and multilingual A1 application procedure across the EU with harmonised forms and access and authentication procedures. This will replace the current patchwork of national portals and significantly reduce the administrative burden on companies.

The technical merger of the standardised digital EU posting form ("eDeclaration") with the A1 certificate is the next logical step and must consistently follow the "once-only" principle. The current high administrative burden results from separate procedures for applying for the A1 certificate and for posting notifications, which means that identical data has to be provided multiple times and in different systems. Double reporting for the posting of the same employee is unreasonable for both companies and authorities.

Making digital identification usable

The EUDI wallet must be established quickly and bindingly as the central digital infrastructure for cross-border labour mobility. A1 certificates, posting notifications, health insurance cards, work permits, professional qualifications and the ESE p must be fully integrated – with clear deadlines and without parallel paper-based procedures.

For individuals who cannot or do not want to use the EUDI wallet, equivalent printable documents should be available on a case-by-case basis. Uniform digital verification is crucial – regardless of the document format and without the creation of parallel control or verification systems.

The European Business Wallet can also be used as a voluntary tool to support companies with secure digital identification, authentication and signatures, and to significantly facilitate exchanges with authorities, for example in the case of A1 certificates.

Establishing binding force

The implementation of interoperable digital solutions must not be left to the discretion of individual Member States. The unity of the internal market must also be maintained in terms of labour mobility in 27 Member States. Central documents relating to social security coordination require EU-wide binding standards and deadlines that apply to all authorities. This creates legal certainty, equal treatment and planning security for companies.

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