RESPONSE TO THE CALL FOR EVIDENCE FOR AN IMPACT ASSESSMENT EUROPEAN SOCIAL SECURITY PASS: ESSPASS

Brussels, 9 February 2026

On 14 January 2026, the Commission has put out a Call for evidence for an impact assessment with regard to a European Social Security Pass (ESSPASS). This will feed into a possible initiative in the frame of the "Fair Labour Mobility Package".

In its pilot version, ESSPASS originates from digitising European social security rights. The Commission intends the use of ESSPASS for additional aims, other than related to social security, in particular issues related to the posting notification (labour law) in cross-border situations.

With this paper, Ceemet would like to provide its views on the topic highlighted in the Call and make the following comments.

Preliminary remarks

In the current geopolitical context, Europe faces a clear choice to strengthen its competitiveness by completing the single market. Ceemet therefore urges the Commission to embrace opportunities within the single market by reducing the administrative burden of companies. Avoiding multiple administrative procedures and avoiding divergent national practices is key for the completion of the single market.

To maintain our high social standards and national welfare systems, we need competitive companies: no quality jobs without competitive and sustainable companies. **Ceemet would welcome a Package on Labour Mobility,** if it would bring simplification in practice, a more streamlined and pragmatic holistic approach of procedures resulting in a drastic reduction of administrative burden for employers, while keeping the high level of social protection for workers. Simplification, therefore, should not be seen as a technical solution, but as a strategic enabler to cross-border economic activity and labour mobility. Simplification should not be confused with deregulation either. The distinction is fundamental.

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ESSPASS is a step towards digitalisation and simplification in cross border situations. Recognising the need of removing practical barriers to mobility, including in border regions, is essential. Labour mobility, and especially the posting of workers, is crucial for companies in Europe's Metal, Engineering and Technology-based (MET) industries that Ceemet represents. In a globalised world, cross-border supply and value chains have become the standard. The burdensome procedures for temporary posting of workers are rightfully described as one of the "terrible ten" barriers of the Single Market that the Commission vows to tackle with priority. At the same time, it is essential that digitalisation indeed simplifies existing procedural matters and does not create inadvertently additional bureaucratic tasks.

ESSPASS: digital portfolio for documents proving rights and entitlements

In the **initial** pilot project, ESSPASS aimed at digitalising instruments relating to **social security rights** in a cross-border perspective. ESSPASS intends to provide online verifiable access proving social security rights in a cross-border context, thus improving information exchange. In particular the PDA1, which proves the affiliation of a person to the social security scheme of a Member State when posted within the EU, as well as the European Health Insurance Card (EHIC), which gives a person the right to emergency health care in a different country than their own affiliation Member State, are documents that are used most within the EU.

The Commission rightfully questions to step **beyond** social security alone, and to **also take labour law aspects on board**, such as the posting declaration. Ceemet applauds the holistic approach of labour mobility by the Commission. In practice, companies may encounter difficulties in clearly identifying the respective requirements arising from social security and labour law. The establishment of a single channel would contribute to facilitating compliance with the existing legal framework.

ESSPASS is (part of) a digital wallet, that holds the **result** (e-form, document, certificate) following a specific procedure to obtain a document which proves that the individual has a certain right or entitlement. Ideally, ESSPASS could be an application for smartphones, in which individuals can keep e-forms and documents in a **secured, verifiable, structured and user-friendly way**. It should however remain possible for individuals to use printed documents in order to prove their rights.

It is crucial to make the ESSPASS future-proof. In the architecture of the ESSPASS, there should be room for further steps, in a modular, purpose-bound and voluntary way. Indeed, in a later stage, in addition to social security and labour law, the ESSPASS-app/digital wallet should be able to allow other documents, such as diplomas and certificates. Also, immigration documents (work permit; single permit) of third country nationals, could be kept in order to easily provide clarity of the right of a third country national to be posted within the EU. In this respect it is essential that there are clear rules safeguarding strict data minimisation and role-based access. Clarifying these safeguards at workers would enhance legal clarity, foster

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acceptance among employers and workers, and ensure that ESSPASS remains focused on facilitating labour mobility rather than adding new layers of complexity.

ESSPASS would thus become a digital wallet that reaches further than only social security rights and entitlements.

ESSPASS 1.0: PDA1 for posting or for multistate employment

The PDA1 is a statement delivered by the national social security administration of a Member State, at the request of an employer, for one worker. Two situations can occur: the worker is posted to temporarily work in another MS, or the worker will be working in more than one MS (multistate employment).

For a **temporary posting**[1], the national administration will check several facts before delivering an A1, to determine if the conditions for a posting are met. The employer will be asked to provide certain data in the A1 request regarding the employer (such as company name, address, activity code, contact person representing the employer) as well a set of information of the posted worker (contact details, social security number, date and place of birth, nationality, duration and place of posting). This – in essence general and straightforward – exercise may hide a multi-layered reality. Depending on the **digital maturity of the Member State**, the possibility to tap into different databases within the same country, the interoperability of data exchanges between various administrations of that Member State and the automation maturity of this process, the result is a **fully automated process**. In this respect Ceemet would like to invite the Commission to encourage Member States to embrace digitalisation. It should be made mandatory for Member States to implement a full digital solution for the request, issuance and real-time verification of standardised social security coordination documents.

If also the A1-request procedure itself is digitalised, the time spent on this procedure by the employer per employee will be about 5 minutes. Otherwise, it is at least 20 minutes[2]. The more experience (the HR officer) has requesting A1's, the faster it will go.

If all automated checks give a green light, producing and delivering an A1 will be a matter of minutes. The **employer will receive the A1** (in a secure) company mailbox within the hour. Unless the process notices an irregularity, there is no interference of a civil servant. Member States should be subject to binding deadlines for their national authorities to issue social security coordination documents. Today, in some Member States, it is nearly impossible to obtain an A1 certificate, or it can take many months before a decision is made.

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[1] Based on Article 12 of Regulation 883/2004. The request for a multi-state employment (Article 13 of Regulation 883/2004) involves a procedure where the receiving national social security administrations must give their approval. This process therefore takes longer.
[2] Stiftung Familienunternehmen, Regulatory and financial burdens of EU legislation in four Member States – a comparative study, Vol. 1: Regulatory and financial burdens arising from the A1 Certificate, p. XIII.

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A **copy of the A1** could then also **automatically** be sent **to the ESSPASS of the worker**. In addition, the EHIC ought to be issued automatically together with A1, rather than – as today – requiring individuals to apply through a separate process.

The possibility to **add a QR-code**[3] on the A1 document, or, alternatively to send only a QR code **to the employee's ESSPASS**, could allow a **secured, verifiable, structured and user-friendly way** to prevent misuses or abuses.

ESSPASS 2.0: aligning the underlying procedures and exemptions

Interestingly**, the social security administration that delivers the A1, must also send a copy of the A1 document to the national social security administration of the receiving Member State.**[4] This means that the authorities of the host Member State already receive information: worker A from company B situated in country C, will work in their country from date X to date Y in host company Y.

The question is what the national social security authorities do with this information. Is it shared with the national authorities of other departments in their country, such as those responsible for employment legislation?

Ceemet is of the opinion that the information contained in the A1, and that is already forwarded to the social security administration of the host Member State, should be used or re-used within that Member State for the posting notification.

If a QR code could be put on the A1, it would be interesting to include in the architecture of the code the technical possibility to decompose the individual data points that were originally used for the A1 request. These datapoints can then be re-used towards the posting declaration in the host MS. **This would in fact give the required information for a simple notification**[5] **prior to the posting**. In addition, if there is an exemption regarding social security, the same logic should apply for labour law: an exemption for an A1 should automatically lead to an exemption for a posting notification. Where possible, the procedures for requesting a portable document A1 (and the EHIC) should therefore be interconnected with the procedures for completing the posting declaration.

The **Once-Only Technical System** approach should be implemented in every Member State. This would drastically reduce the administrative burden of companies by not having to

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[3] Inspiration can be found in the Corona-safe app, which allowed cross-border travel during the Covid-19 pandemic.

[4] Article 15, 1 (in fine) of Implementing Regulation 987/2009: " [...] *That institution shall issue the attestation referred to in Article 19(2) of the implementing Regulation to the person concerned and shall without delay make information concerning the legislation applicable to that person, pursuant to Article 11(3)(b) or Article 12 of the basic Regulation, **available to the institution designated by the competent authority of the Member State in which the activity is pursued**."*

[5] Article 9, 1, a of Directive 2014/67/EU of 15 May 2014 on the Enforcement of Directive 96/71/EC concerning the posting of workers in the framework of the provision of services and amending Regulation (EU) No 1024/2012 on administration co-operation through the Internal Market System ('the IMI Regulation)

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duplicate the same procedures and the same documentation because businesses and employees will only need to submit the same information once. Moreover, the validity of the A1 could be extended without increasing the risk of abuse, as national authorities would be able to verify and revoke documents immediately. This would also reduce the administrative burden associated with renewing A1 certificates for both companies and national authorities.

Labour mobility in practice: aligning procedures for labour mobility in a holistic approach

When posting a worker to another Member State, different aspects must be looked at by the employer: labour law, including posting notifications; social security aspects; residence and immigration aspects; taxation. For each of these topics, there are different answers depending on the duration of the posting, the nationality of the posted worker, the place of (tax) residency and the type of activity that the posted worker will perform.

From an employers' perspective, and especially for SMEs, the simple question that John will be sent to France for 3 days/3weeks/3 months/3years, becomes a many-faced monster. A **holistic approach** should cater for the various procedures to be aligned, that information should only be given once (OOTS principle), that different administrations within the same country talk to each other, and that administrations between countries talk to each other.

Parallel to the ESSPASS/Digital Wallet for persons, Ceemet follows the development of the **EU Business Wallet**.

Last but not least, **awareness campaigns** of new tools, such as ESSPASS, should be an integral part of a comprehensive communication campaign on labour mobility, so that companies and workers can embrace these new systems and understand their advantages.

Conclusion

Ceemet endorses policy option 4, which **embrace ESSPASS** uses existing **electronic** frameworks as EBSI for Verifiable Credentials, the proposed European Digital Identity (EUDI) framework and the EU 'Single Digital Gateway' Regulation. Through real-time mechanisms for cross-border verification of the social security entitlements, ESPASS will be an important stepping stone for labour mobility. At the same time, the use of **printable documents with a QR-code**, should remain possible.

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