PROTECTION SOCIALE FRANÇAISE

Position Paper - REIF

REIF position on the European Social Security PASS (ESSPASS) proposal

October 30, 2026

REIF represents social security institutions which will be at the forefront of the implementation of the ESSPASS Regulation. The Commission's proposal goes way beyond ESSPASS and covers more broadly digitalisation of social security as a whole. In order to achieve its objective to support the free movement of persons within the single market, this Regulation should provide for an efficient, proportionate and implementable framework. The Commission should also provide for a clear overview of ESSPASS articulation with other EU legislation pieces and digital tools touching upon social security; a future evaluation of the EESSI model currently based on a form-based approach would be useful to guarantee that the system remains fit for purpose. REIF therefore asks the colegislators to consider the following when examining the ESSPASS proposal:

1. **Priority setting** – REIF asks for the careful evaluation of the relevance to make each portable document available in the wallet, and to prioritise their inclusion. Given their relevance and the prior pilot projects at EU-level, we support the priority given to the A1 portable document (hereafter PDA1) and the European Health Insurance Card (hereafter EHIC). As for other social security documents relevant within the scope of the 883/2004 Regulation, we believe that a progressive deployment based on an individual, comprehensive cost/benefits and feasibility evaluation is to be preferred. **We therefore ask the Council and the Parliament to consider a new drafting of art. 5 which would provide for the addition of new portable documents into ESSPASS via a positive list, in a progressive manner and after an in-depth impact assessment for each portable document**.
2. **Delay for application** - Making any portable document available in the wallet will require a development phase which can only start once the functional and technical specifications have been adopted. **REIF therefore asks for the deadlines referred to in art. 5.1 to be calculated in a realistic manner, as of the adoption of the respective implementing acts laying down the technical specifications** instead of in reference to the entry into force of the Regulation itself (see below new timeline proposal).
3. **PDA1s - As regards PDA1, the current legislative proposal should be amended in order to clarify some provisions on the one hand and to better frame the upcoming implementing acts on the other**.
    a. **Deliverance of the PDA1** - While recital 14 mentions that workers "might be unaware that employers have requested a portable document A1 related to their cross-border activity or have had one issued [and] workers' direct access to social security documents should therefore be facilitated", there is no specific provision in the Regulation proposal on how the Commission intends to implement this. For

employees, the PDA1 is currently asked by and issued to the employer, which is in charge of transmitting it to the worker; a direct transmission from the social security institutions to the employee would represent an operational challenge which has not been tested so far. Consequently, **REIF asks for the PDA1 to be delivered by competent social security institutions according to the provisions set by the coordination Regulations and national legislation.**

b. **Minimum information requirement for PDA1** - The draft regulation also foresees the adoption of an implementing act establishing common information requirements for the PDA1 (art.10). While acknowledging that data to be entered to request a PDA1 should be proportionate, REIF recalls that they should allow for the efficient verification of the adequate coverage of a posted or multi-active worker. **It therefore asks for the removal of the reference to "the due regard to the administrative burden reduction", which should not be given priority towards the needs of control bodies. In addition, REIF suggests drawing the list of the minimum information required to enable the correct determination of the applicable legislation in a new Annex to the Regulation.**

c. **Delay for the issuance of a PDA1 - REIF asks for a nuanced approach as regards the implementing act foreseen to set the deadline for issuing PDA1 (art.8.3)**. While most A1 are issued in an automatic manner and in less than 24 hours in France, more complex cases require - and will keep requiring – a more meticulous examination and exchanges of information between competent institutions to determine applicable legislation. This is necessary to ensure the efficient coverage of mobile workers and contain the risk of fraud and error.

4. **EHIC issuance** - REIF asks for a more realistic approach as regards the deadline for issuing EHIC (art.8.4), which is to be fixed by an implementing act (art. 8.2). A more meticulous examination regarding the affiliation of insured people is sometimes required. **REIF therefore advocates for a maximum deadline of 48 hours**.

5. **Maximum time periods for exchanges through EESSI** - REIF Members are strongly committed to ensuring the efficient operation of the system for Electronic Exchange of Social Security Information (EESSI) which is the backbone of information exchanges among social security institutions in Europe. The smooth functioning of EESSI and the ability of institutions to exchange within specific timeframes depend, above all, on the **quality of data exchanged**, **loyal cooperation** and availability of means, rather than on technical or digital processes. This is why the determination of time periods for exchanges via EESSI should remain a prerogative of the Administrative Commission. **REIF therefore calls for the deletion of Annex I of the Regulation, referred to in art. 11.2**, which sets maximum time periods for exchanges through the EESSI.

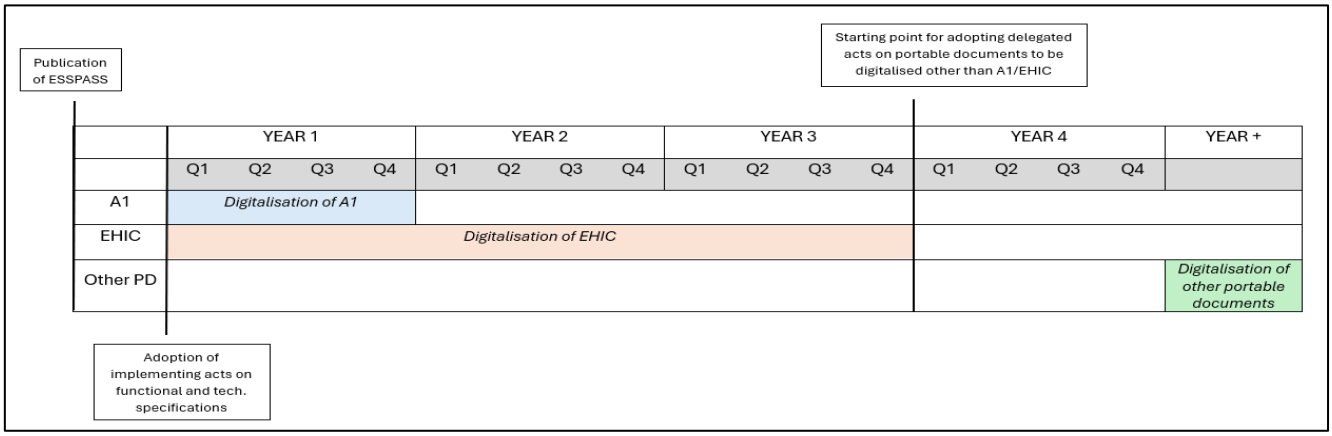
6. **Bilateral exchanges and agreements outside of EESSI** – France Travail (France) and INPS (Italy) have reached and implemented a successful exchange of information agreement (link: agreement) to strengthen bulk data exchange on unemployment benefits and better tackle social security fraud. Following the revision of the coordination Regulations, a more secure legal basis has been established to enable such data exchanges. The draft ESSPASS proposal also contains a new provision relating to information exchange outside of the EESSI framework (art 12). **REIF considers the legal basis provided by the coordination Regulations to be sufficient and believes that there is no need for further framing by common procedures and technical**

specifications. In any case, exchanges should remain possible outside of EESSI where they are necessary and proportionate, or where the EESSI system cannot be used effectively. REIF therefore asks for the deletion of art. 12.2 and 12.3.

7. **Governance of social security digitalisation** – We acknowledge that there is room to improve the coherence and readability of EU policies digitalizing social security processes. REIF however underlines that whatever governance structure is chosen, the following elements should be taken into account: (1) a clear limitation to technical aspects; (2) the relevance for final users; **(3) a comprehensive cost/benefits analysis for social security institutions; (4) the comparison between the relevance to establish an EU-infrastructure or to set interoperability criteria for national systems; (5) more clarity and consistency with other relevant digital initiatives at EU-level**.

8. **Adequate financing** – The implementation of the Regulation will require a high investment by social security institutions over several years in infrastructures, the establishment of new processes and/or human resources. **The European Union should make adequate financial means available, via programmes which are easily accessible to social security institutions**. REIF also underlines that an important number of verifiers, in particular healthcare providers, will have to be equipped in order to be able to read QR-codes and therefore asks the European Commission to consider information campaigns and financing programmes towards them.

New timeline proposed by REIF for ESSPASS



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