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Deutsche Sozialversicherung  
Europavertretung | DSV

## Feedback from German Social Insurance issued 2 February 2026

Call for evidence by the European Commission on a Fair  
Labour Mobility Package



## I. Preliminary remarks

The German Social Insurance (DSV) welcomes the announced Fair Labour Mobility Package and the initiatives contained therein, in particular a proposal for a European Social Security Pass (ESSPASS) and a stronger mandate for the European Labour Authority. Cross-border labour mobility under fair conditions is a central pillar of the European social model. It strengthens upward economic and social convergence within the European Union (EU) and is at the same time a decisive factor for Europe's competitiveness.

## II. Position

### **1 \_ Coordination of social security systems**

With regard to the coordination of social security systems, the DSV shares the European Commission's assessment that digital innovations need to be further advanced. Successful labour mobility in Europe requires cross-border social security coverage. In order to fully exploit the benefits of labour mobility, administrative procedures must be further simplified, digitalised and designed to be interoperable. The DSV sees significant potential in particular in the completion of the Electronic Exchange of Social Security Information (EESI), the introduction of an ESSPASS and the implementation of EU-wide access to health data for healthcare provision and research on the basis of the European Health Data Space (EHDS). When introducing an ESSPASS, it is crucial that it builds on existing structures and procedures and meaningfully complements them. In addition to the conclusion of the pending revision of the coordination regulations, the DSV advocates the further development of coordination law with the aim of making its application in practice even more efficient and closing legal gaps.

### **2 \_ Labour cards/social ID cards in the construction sector**

With regard to the introduction of labour cards/social ID cards in the construction sector, the DSV points out that national systems for construction site ID cards already exist in many Member States. These primarily pursue the objective of combating undeclared work and illegal employment and make a reliable contribution in this respect. Only around one third of the Member States with construction site ID cards



also use them to provide evidence of occupational health and safety qualifications. From the DSV's perspective, the challenges identified by the European Commission in the call for evidence for a legal act on construction services regarding access to national construction site ID cards for monitoring compliance with health and safety regulations are therefore not comprehensible. Against this background, the DSV considers an interoperable approach for existing national systems to be more appropriate than the introduction of a uniform European card. The existing findings from the analysis of social identity cards in construction (SIDE-CIC project) regarding the practical feasibility and actual added value of a uniform European system should be duly taken into account in this context. Occupational health and safety requirements must be upheld – in particular the responsibility of employers to assess and ensure the necessary qualifications and competences of their employees in the field of occupational health and safety. Against this background, close coordination between the Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs (DG GROW) and the Directorate-General for Employment, Social Affairs and Inclusion (DG EMPL) is particularly important.

In addition, the DSV points out that the conditions and challenges in the construction sector closely resemble those in other sectors, such as agriculture, including horticulture. Against this background, it could be useful to examine further steps to support the introduction of labour cards/social ID cards and their interoperability also for these areas in the future, without losing sight of sector-specific characteristics.

### **3 \_ Electronic identification and wallets**

The DSV supports the development of digital identity solutions and wallet structures, as they can offer additional possibilities for digital exchange and contribute to the interoperability of public services – both at national level and cross-border within the framework of European coordination law. This applies, for example, to the application for A1 certificates, which could be facilitated through additional methods of applicant authentication. Independently of this, the storage of evidence in wallets – in addition to transmission within the existing electronic application and certification procedure – would create the challenge that changes to portable documents, such as the A1 certificate, would have to be implemented in real time across all digital solutions. At the same time, this would also represent an advantage, as such changes would be available promptly and could be traced. It must be ensured that the design of wallet structures is carried out in close coordination with existing and planned instruments in the field of social security – such as the ESSPASS and the European Business Wallet. A preferred use of wallet structures and the additional assessment of existing



electronic procedures can create added value for all parties involved and, in the long term, contribute to minimising financial and organisational efforts.

Overall, experience from administrative practice is indispensable for implementing new instruments in a practical and efficient manner. The social insurance institutions have many years of expertise in carrying out cross-border procedures, in particular within the framework of the coordination of social security systems. From the DSV's perspective, it is therefore essential to consistently and at an early stage involve the expertise of social insurance in the design of measures for European interoperability.

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## About us

The German Federal Pension Insurance (DRV Bund), the German Social Accident Insurance (DGUV), the National Association of Statutory Health Insurance Funds (GKV-Spitzenverband), the national associations for statutory health and long-term care insurance funds at the federal level and the Social Insurance for Agriculture, Forestry and Horticulture (SVLFG) have joined forces to form the "German Social Insurance - Working Group Europe" (Deutsche Sozialversicherung Arbeitsgemeinschaft Europa e. V.) with a view to their common European policy interests. The association represents the interests of its members vis-à-vis the bodies of the European Union (EU) as well as other European institutions and advises the relevant stakeholders in the context of current legislative projects and initiatives. As part of the statutory insurance system in Germany, health and long-term care insurance with 75 million insured persons, pension insurance with 57 million insured persons and accident insurance with more than 70 million insured persons in 5.2 million member companies offer effective protection against the consequences of major risks of life.