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Transparency Register ID:
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Deutsche Sozialversicherung
Europavertretung | DSV

Feedback from German Social Insurance issued 16 April 2026

Consultation by the European Commission on a European
Social Security Pass

I. Preliminary remarks

The German Social Insurance (DSV) explicitly supports the European Commission's initiative to introduce a European Social Security Pass (ESSPASS). This can contribute to simplifying administrative procedures, facilitating the exercise of rights for citizens and effectively combating fraud. In this way, cooperation between social security institutions in Europe within the framework of the coordination of social security systems can be made simpler, more modern and more efficient.

For a successful and sustainable implementation, it is crucial from the perspective of DSV that the ESSPASS builds on existing structures and solutions. DSV therefore advocates aligning the ESSPASS closely with the EU Digital Identity Wallet (EUDI Wallet) and making use of the experience gained from the DC4EU pilot project. This will allow synergies to be fully leveraged and broad acceptance to be ensured.

II. Position

DSV supports Option 4 as proposed by the European Commission. This option provides for an interoperable EU solution based on the EUDI framework in combination with enhanced social security documents. In this context, DSV supports mandatory implementation by the Member States. A prerequisite for this is a common technical infrastructure for all document formats:

- _ electronic (PDF with QR code without identity binding),
- _ digital (EUDI Wallet with identity binding), and
- _ physical (paper printout or card with QR code without identity binding).

From the perspective of DSV, the objective is full interoperability within the Architecture and Reference Framework (ARF) as well as a realistic timeline for national implementation in the Member States. As a first step, the Portable Document A1 (PD A1) and the European Health Insurance Card (EHIC) should be integrated. A standardised infrastructure will facilitate the subsequent integration of any additional documents.

As the use of the ESSPASS and the EUDI Wallet remains voluntary for citizens, all documents must be available in physical as well as electronic and digital form, with the latter provided as Qualified Electronic Attestations of Attributes (QEAA). All formats must be verifiable, in particular via QR codes and a verifier app. It is also

important that verification works offline to ensure the functionality of the ESSPASS independently of network availability. This requires clear rules, for example on the validity of offline verifications and on how to handle technical disruptions. Furthermore, the use of the ESSPASS must be accessible at all times for all users.

The protection of personal data is of high priority for DSV. In particular, the principles of data minimisation and purpose limitation are guiding principles. Insured persons must always retain control over their data. At the same time, practical solutions are needed for representation, for example for children or persons in need of care. These must be digitally enabled and revocable in a flexible manner.

The technical implementation of the ESSPASS should be carried out in stages, with clearly defined development phases and implementation timelines. A prerequisite for this is a uniform, stable and versioned architecture (ARF) for each stage, to be established prior to national implementation.

In addition, an EU-wide governance structure with defined support levels is necessary in order to clearly regulate escalation procedures, release cycles and fallback mechanisms. Furthermore, revocation mechanisms, certificate management, data retention and deletion periods as well as the handling of device or document loss must be defined in a harmonised manner. Close and active involvement of social security institutions at all stages is essential to ensure that their technical and legal expertise as well as their knowledge of day-to-day administrative processes are fully taken into account.

Overall, a well-functioning ESSPASS offers significant benefits for insured persons, employers and social security institutions. These include faster and more reliable procedures, real-time verification of documents, fraud reduction and simplified data processing by authorised entities. This requires a consistent user experience as well as alignment across all document formats, both in terms of content and technical implementation. An interoperable, data protection-compliant, user-friendly as well as technically robust and resilient ESSPASS can thus make an important contribution to the digitalisation and modernisation of social security in Europe and strengthen the free movement of citizens.

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.