

CALL FOR EVIDENCE FOR AN IMPACT ASSESSMENT EUROPEAN SOCIAL SECURITY PASS (ESSPASS)

CEI-Bois contribution

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1. Introduction

The European woodworking industries support initiatives that simplify administrative procedures, strengthen the functioning of the Single Market and enhance the competitiveness of European businesses. Administrative burdens remain a significant challenge for companies, in particular for small and medium-sized enterprises, as they divert resources away from productive activities and discourage cross-border service provision.

In this context, the objective of reducing reporting obligations for companies and SMEs is welcomed. Simplification, digitalisation and data minimisation should remain guiding principles of any future initiative aimed at facilitating labour mobility and social security coordination across borders.

The sector considers that improvements to administrative processes should provide tangible benefits to businesses, workers and national authorities alike, while ensuring fairness, legal certainty and effective enforcement within the Single Market.

2. Administrative challenges in cross-border activities

Companies operating across borders encounter complex and time-consuming administrative overlapping procedures. The posting of workers is a clear example of existing burdens, which requires the need to apply for the portable document A1, while separately submitting posting notifications. This need to apply for portable documents and to complete distinct notification requirements generates disproportionate administrative burdens, especially for SMEs. These procedures can act as a deterrent to cross-border activities and reduce the efficiency of labour mobility within the Single Market.

Simplification measures that streamline procedures, reduce duplication of data submission and facilitate digital processing are therefore essential. Initiatives aimed at introducing unified digital declarations or harmonised processes should be prioritised and implemented without unnecessary delay.

3. Objectives of the initiative

The current initiative represents an important opportunity to:

- facilitate the cross-border exercise of social security rights;



- simplify administrative procedures for citizens, companies and authorities; and
- ensure fairness and effective functioning of the Single Market.

Success will depend on the extent to which the initiative reduces bureaucracy, ensures legal certainty and provides practical, user-friendly tools that can be easily adopted by businesses of all sizes.

4. Preferred policy option

From the perspective of ensuring the greatest possible simplification for businesses, we consider Option 4 (a combination of Options 2 and 3) to be the preferred choice.

This would be the most effective approach: a comprehensive, interoperable digital solution which combines enhanced social security coordination documents with a fully digital infrastructure for application, issuance and real-time verification. A solution built on existing EU digital frameworks, including the Single Digital Gateway, the Once Only Technical System and the European Digital Identity framework, offers the greatest potential to reduce administrative burdens, improve efficiency and ensure secure verification across borders. The availability of standardised digital documents with integrated verification features, including QR-code-based validation, would significantly reduce the risk of falsification and contribute to preventing fraud and abuse. At the same time, it is essential to ensure accessibility by maintaining printable formats for individuals who cannot or prefer not to use digital wallets, while enabling a single digital verification procedure regardless of format.

5. Implementation approach

To guarantee consistency and legal certainty across the Single Market, a harmonised EU-wide solution should be pursued in the long term. A phased implementation approach may be appropriate, allowing for an initial voluntary uptake to support early adopters and facilitate gradual transition, followed by a more uniform application once systems and practices are fully established.

Clear timelines, interoperability between national systems and a strong focus on user-friendliness will be essential to ensure effective implementation and widespread acceptance among businesses.

6. Further simplification opportunities

Further administrative relief could be achieved by aligning and, where technically feasible, merging procedures that currently require separate submissions but rely on overlapping information. In particular, combining application processes with notification requirements and applying once-only data collection principles would significantly reduce bureaucracy for companies sending employees abroad or carrying out short-term cross-border assignments.

Such simplification would provide tangible benefits to businesses, improve compliance and contribute to a more efficient and competitive Single Market.

7. Conclusion

CEI-Bois supports the development of a modern, secure and interoperable digital framework for social security coordination that delivers real administrative simplification for companies and workers. A comprehensive EU-wide digital solution, supported by harmonised procedures and once-only data collection, has the potential to substantially reduce burdens, improve legal certainty and strengthen cross-border mobility.

The European Commission is therefore encouraged to prioritise ambitious simplification measures, ensure practical usability for businesses of all sizes and pursue a harmonised long-term approach that enhances the functioning and fairness of the Single Market.