

Reply to Call for Evidence on the European Social Security Pass

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Pearle* – Live Performance Europe, the European federation representing performing arts organisations, and a recognised sectoral social partner, welcomes the initiative of the European Commission to develop a European Social Security Pass (ESSPASS) and appreciates the opportunity to contribute to this Call for Evidence supporting the impact assessment.

Many of our members regularly engage in cross-border activities, often involving short-term engagements and group mobility. This places employers and workers in the live performance sector among those most directly affected by the practical application of EU social security coordination rules and related administrative procedures. We therefore consider this initiative an important opportunity to improve the exercise of free movement rights while reducing unnecessary administrative burdens.

1) **Challenges faced by the live performance sector**

Employers and workers in the live performance sector **face recurring and disproportionate administrative burdens** when dealing with cross-border social security procedures.

Applying for an A1 Declaration for each posting remains **time-consuming and complex**, particularly for micro and small organisations without specialised administrative staff, as well as for larger institutions managing multiple workers and destinations simultaneously. **Delays are common and may result in significant penalties in host Member States as well as jeopardise the timely start of work.**

The need to process multiple applications across different national systems increases the risk of error. Digital infrastructures remain fragmented, often requiring the **same information to be entered repeatedly on different platforms**, with limited interoperability between national systems, EESSI and other tools.

In addition, **uncertainty persists when determining applicable legislation**, notably where workers combine employed and self-employed activities or work in several Member States within the same year. Workers themselves frequently **lack access to a clear and consolidated overview of their social security affiliation and entitlements**. **Social security administrations** sometimes requalify as competent authority *ex post*, which leads to a complex situation of rectification both for the employer and worker.

These challenges are amplified in highly mobile sectors with short-term engagements and group travel, and they can discourage cross-border activity, affecting both workers' mobility and companies' ability to operate within the EU single market.

2) Expectations for ESSPASS and potential benefits

Pearle* considers that ESSPASS can bring significant added value if it **delivers genuine simplification and interoperability**. From the perspective of employers and workers in the live performance sector, ESSPASS would be most beneficial if it:

- Enables a true once-only data approach, avoiding repeated submission of the same information;
- Is fully interoperable with national systems and EESSI;
- Allows real-time or near real-time verification of social security coordination documents in host countries;
- Provides workers with direct access to authoritative information on their affiliation and rights;
- Integrates smoothly into existing administrative workflows used by employers and provides reliable information on the qualifying country.

A secure, standardised digital format for key social security coordination documents, including A1 Declarations, **could substantially reduce administrative burden, improve legal certainty, increase compliance and help prevent both unintentional errors**. ESSPASS could also support **workers in maintaining an accessible history of their cross-border coverage, increasing transparency and awareness of their rights. Especially for workers with many short-term and international work assignments, this can provide a much more accurate overview of rights obtained.**

Pearle* further sees potential benefits in expanding the European Digital Identity framework to additional relevant documents, such as qualifications, digital credentials and confirmations of posting notifications, and where appropriate elements linked to residence or work-permit procedures. Combined within a single user interface, this could progressively function as a one-stop shop for mobile workers and employers, reducing reliance on physical documentation, limiting duplication across systems and facilitating more efficient checks during cross-border engagements.

3) Policy Option 4: an interoperable EU solution based on the EUDI framework combined with enhanced social security documents

Among the policy options presented, Pearle* supports the European Commission's **Policy Option 4 (interoperable EU solution based on the EUDI framework combined with enhanced social security documents)**.

This option offers the most comprehensive and inclusive approach by combining:

- A fully interoperable EU digital infrastructure;
- Real-time verification capabilities;
- Enhanced printable documents for individuals who cannot or prefer not to use digital wallets;
- A single verification process regardless of format.

This hybrid model is essential to ensure accessibility while avoiding parallel systems and maintaining consistency across the Union.

Pearle* considers **mandatory implementation** by all Member States to be a key condition for success. Voluntary participation risks perpetuating fragmentation and undermining

interoperability. A binding EU-wide framework is necessary to achieve harmonisation, mutual recognition and equal conditions for mobile workers and service providers.

Binding deadlines for issuing social security coordination documents would further enhance predictability and reduce operational disruptions for cross-border activities.

4) Importance of harmonisation and simplification of A1 Declarations

Pearle* strongly supports the Commission's intention to address structural shortcomings linked to A1 Declarations. In particular, we support:

- Harmonisation of information requirements across Member States;
- Simplification of A1 application procedures;
- Technical integration of A1 requests with posting declarations, allowing applicants to provide common data only once.

For highly mobile sectors such as live performance, merging these procedures into a single workflow would significantly reduce administrative burden, especially when managing touring groups across multiple countries.

Conclusion

Pearle* welcomes ESSPASS as a promising and welcoming initiative to facilitate free movement, improve enforcement of social security coordination rules and reduce unnecessary administrative burdens on employers and workers.

Based on sector experience, **we support Policy Option 4 (interoperable EU solution based on the EUDI framework combined with enhanced social security documents)** as the preferred model, **combined with mandatory implementation** across all Member States to ensure harmonisation. **We also underline the importance of harmonised and simplified A1 procedures**, including convergence of information requirements and integration with posting declarations, as well as full interoperability with national systems and EESSI. A user-centred design reflecting the realities of highly mobile sectors will be essential for ESSPASS to deliver tangible benefits in practice.

Pearle* remains available to contribute its practical expertise to the impact assessment and subsequent policy development, particularly regarding touring, short-term postings and group mobility in the live performance sector.