



Brussels, 11-02-2026

EurECCA's submission to the call for evidence on the European Social Security Pass – ESSPASS

The structural reality of transnational cabin crew work

The European Social Security Pass is being proposed at a moment when European labour mobility has reached a level of structural complexity that existing legal and administrative instruments are no longer able to sustain. As part of the broader **Fair Labour Mobility Package**, the initiative represents an important opportunity to strengthen the practical effectiveness of social rights in a single market characterised by increasing cross-border employment.

For cabin crew, whose professional lives unfold across borders as a matter of routine rather than exception, the initiative is not merely technical in nature. It touches upon the very conditions under which social security rights are defined, accessed and enforced in a transnational labour market increasingly marked by fragmentation, regulatory competition and asymmetries of power between employers and cabin crew.

EurECCA acknowledges the political ambition behind the ESSPASS initiative and welcomes the Commission's recognition that the current system of social security coordination remains burdened by procedural opacity, legal uncertainty and insufficient enforceability. The persistence of non-verifiable documents, parallel administrative procedures and divergent national practices has created a situation in which mobile workers are formally protected by EU law yet practically exposed to uncertainty. This contradiction lies at the heart of the current crisis of trust in the European social dimension: rights exist on paper, but their portability and enforceability remain fragile in practice.

In aviation, where postings, home base changes, wet-leasing arrangements and cross-border employment structures are structurally embedded in business models, these shortcomings are amplified and often transferred onto the individual worker. Cabin crew may be recruited in one Member State, contractually linked to an intermediary in another, socially insured in a third and operationally based in a fourth. In such a fragmented legal landscape, the determination and proof of applicable social security legislation become not merely administrative questions but essential elements of legal certainty, professional stability and access to healthcare and pensions. EurECCA has repeatedly documented these dynamics in its position papers on social dumping in European aviation, on the expansion of ACMI and wet-leasing models, and on atypical employment structures affecting cabin crew across the European Union.



The central role of social security coordination documents

For cabin crew, the portable document A1 is not a neutral administrative form. It is a decisive legal instrument that determines applicable legislation, defines access to social protection and conditions the ability to exercise rights without interruption. Its current fragility, both technical and procedural, has too often resulted in delayed coverage, contested affiliation and retroactive disputes. EurECCA has documented cases where cabin crew were denied access to healthcare abroad or faced retroactive social security claims because the applicable legislation could not be verified in real time or was challenged by different national authorities. In such situations, cabin crew become the first victim of administrative fragmentation.

The European Social Security Pass therefore represents an opportunity to restore legal coherence, provided it is conceived not merely as a digitalisation exercise but as a rights-centred instrument capable of strengthening the social acquis of the Union. The essence of social security coordination under Article 48 TFEU is not administrative efficiency alone, but the effective protection of mobile workers' entitlements. Any technical solution must therefore be assessed against its capacity to enhance legal certainty, equal treatment and enforceability.

EurECCA's preferred policy approach

In this regard, EurECCA expresses a clear preference for the **policy option 4 identified in the Call for Evidence**, namely the interoperable EU solution based on the European Digital Identity (EUDI) framework combined with enhanced social security coordination documents. While the baseline scenario would leave structural deficiencies untouched, and document-based or purely digital solutions would only partially address the underlying problems, this combined approach is the only one capable of reconciling interoperability, legal certainty and inclusiveness.

Unlike the other scenarios, this model does not treat digitalisation as an end in itself. Instead, it combines real-time digital interoperability with enhanced documents that remain independently verifiable and printable. Such a dual architecture is essential from a legal standpoint. It ensures that the existence and enforceability of social security rights do not depend on a single technological channel or on the worker's capacity to access and control a digital wallet at all times. Rights must remain portable in substance, not only in form.



This structural guarantee is particularly important in aviation, where employment relationships are frequently characterised by complex corporate structures, intermediaries, temporary postings and multi-jurisdictional operations. Cabin crew must be able to demonstrate applicable legislation and social security affiliation in a wide range of contexts, including ramp inspections, labour disputes, medical treatment abroad or judicial proceedings. A system relying solely on digital wallets could create new forms of dependency, particularly where access to digital tools is mediated by employers or third parties. By contrast, the combined interoperable and document-based approach preserves both technological progress and legal resilience.

Safeguards against abuse and social dumping

From a doctrinal perspective, this combined approach is also the most consistent with the principles underlying EU social security coordination. The coordination system is built on legal certainty, equality of treatment and the prevention of overlapping or missing coverage. A fully interoperable system that ensures immediate verification across Member States strengthens these principles by reducing the margin for conflicting interpretations or administrative delays. At the same time, the availability of enhanced, verifiable documents safeguards evidentiary stability and procedural fairness.

EurECCA considers that option 4 offers the strongest safeguards against abuse and social dumping. By ensuring EU-wide interoperability, verifiability and legal equivalence of social security coordination documents across formats, it significantly reduces the scope for fraudulent postings, artificial arrangements and disputes over applicable legislation. This is particularly relevant in the aviation sector, where social security coordination has increasingly become a central element of competitive strategies based on cost externalisation rather than genuine productivity gains.

A robust ESSPASS framework built on this architecture would also support the work of labour inspectorates, social security institutions and the European Labour Authority. Real-time verification of social security status would make it more difficult to conceal irregular posting arrangements, fictitious bases or artificial contractual chains. A clearer and interoperable system would also reduce administrative burdens and legal uncertainty for compliant employers, thereby contributing to fairer competition within the internal market.



Data protection, accessibility and cabin crew autonomy

At the same time, EurECCA stresses that the implementation of option 4 must remain fully aligned with fundamental principles of EU law, including data minimisation, transparency and the primacy of the worker as the holder of rights. Cabin crew already operate within highly monitored professional environments, subject to operational, safety, security and performance-related data collection. ESSPASS must not evolve into an additional layer of surveillance or a tool through which employers gain indirect control over workers' access to their own social security data. Cabin crew must remain the central actor in the system, with full visibility and control over the use of their information.

Accessibility must also remain a guiding principle. The introduction of digital tools must not create a two-tier system in which digitally equipped workers enjoy faster or more secure access to their rights than others. The availability of enhanced, verifiable documents is therefore not a secondary feature, but a core element of legal inclusiveness. It ensures that the protection offered by EU law is independent of technological capacity, connectivity or employer-controlled devices.

The aviation sector as a structural test case for European labour mobility

Aviation should be understood as a structural test case for the credibility of European labour mobility and for the effectiveness of social security coordination in a genuinely transnational labour market. Few sectors combine such a high degree of cross-border activity with such complex employment structures and such intense competitive pressures. Cabin crew routinely operate across multiple jurisdictions, while their contractual, fiscal and social security arrangements may involve several Member States simultaneously. This reality exposes, in a particularly visible way, the limits of coordination systems that rely on fragmented documentation, delayed verification or divergent administrative practices. When legal certainty is weakened in aviation, the consequences are immediate and tangible. Conversely, a system capable of ensuring clarity, portability and enforceability of social security rights for cabin crew would demonstrate its robustness for all categories of mobile workers in the Union.



Conclusion

In conclusion, EurECCA welcomes the European Social Security Pass as a necessary step within the **Fair Labour Mobility Package** to reconcile free movement with effective social protection. The initiative represents an opportunity not only to modernise administrative procedures, but also to reinforce the social credibility of labour mobility across the Union. For mobile workers such as cabin crew, legal certainty in social security affiliation is not an abstract principle but a daily necessity.

For these reasons, EurECCA supports the **policy option 4 identified in the Call for Evidence**, which combines an interoperable EU solution with enhanced and universally verifiable social security coordination documents. This approach offers the most coherent balance between technological innovation, legal certainty and social inclusiveness, and provides the strongest foundation for a system that protects cabin crew while preserving fair competition within the internal market. EurECCA therefore encourages the Commission to pursue this approach in the forthcoming legislative proposal and stands ready to contribute constructively to the further development and implementation of the European Social Security Pass.

EurECCA stands for fair skies and fair work

FLYING TOGETHER – PROTECTING EACH OTHER

About EurECCA: established in Brussels in 2014, the European Cabin Crew Association, EurECCA, represents, protects and develops the rights and needs of cabin crew all over Europe. It is composed of cabin crew unions from European Union Member States as well as accession and bordering states and represents some 50,000 cabin crew in Europe. EurECCA has no political connections. EurECCA's work is around Cabin Crew working conditions, wages, social protection and health and safety at work.

EurECCA European Cabin Crew Association AISBL
Avenue Louise 143/4
1050 Brussels, Belgium

www.eurecca.eu
contact@eurecca.eu