



Response to Call for Evidence, October 2026

Proposed revision of Schengen Visa Code¹

Introduction

ETOA's membership includes operators who bring leisure and MICE (meetings, incentives, conferences and exhibitions) visitors to Europe from global markets, intra-European operators, destination management organisations and the European supply chain.

We have experience in gathering market insight about the impact of prevailing visa requirements from both origin market outbound and European inbound businesses. We take part in Commission expert groups and communications groups related to cross border travel.

Summary

This section summarises ETOA's recommendations on topic for the sake of completeness and for future reference. The next section addresses the problems as set out in the Call for Evidence.

The interests of security and facilitation are not mutually exclusive: the goal should be to assure both.

Tourism is a strategic asset for Europe given its socio-economic significance, and its dependency on natural and cultural heritage which cannot be offshored but can be substituted by destinations competing in a growing global travel market.

Visa policy and process should be understood as aspects of competitiveness, in addition to their function in security and soft power. In March 2026, the European Council recommended that strategic sectors should map their dependencies to mitigate risk to economic security.²

Europe is dependent on its relative appeal. Complacency is still a significant risk. We know from dialogue with operators in visa-requiring markets that we are seen as increasingly complex and costly; there is a widespread suspicion of prejudice; there is doubt we can adapt sufficiently quickly.

But visa policy should be different: it is entirely within our control, and visa processing should be revenue positive, partly through visa and service fees, but also by the export revenue inbound travel

¹ In response to Call for Evidence Ares(2026)8530615, downloaded from <https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/19222-Revision-of-Schengen-short-stay-visa-procedures-recast-en>

² <https://www.consilium.europa.eu/media/lwhk3itd/en-20260319-european-council-conclusions.pdf>

delivers. If this is understood, and related governance responsibilities sufficiently joined-up, reform and any necessary investment to ensure world-class facilitation and security should follow.

We welcome the Commission's intention to review the current framework and current practice. We share its ambition that there should be more digitalisation of process and, potentially, visas themselves. Of particular interest is the possibility of remote capture of biometrics, now familiar through facial recognition and device security technology.

We also share concerns that there is insufficient alignment with the current code, with sometimes wide divergence in practice among Schengen issuing states. (See ETOA Resources below).

The introduction of ETIAS should help in progress towards visa-waiver status among currently visa-requiring states and generate better understanding of barriers to that.

Call for Evidence summary of problems with ETOA responses

Content in bold italics taken from the Call for Evidence, with ETOA responses below.

1. *Article 25a of the Visa Code already links visa policy to third countries' cooperation on return and readmission. However, the current mechanism does not allow a sufficiently flexible choice of restrictive visa measures or a rapid response when cooperation deteriorates seriously and suddenly. This limits the EU's ability to use visa policy as an effective and credible lever to improve cooperation, which can affect the functioning of return procedures, place pressure on Member States and weaken the coherence of the EU's external action.*

No comment – not our area of expertise.

2. In addition, the Visa Code currently does not provide a dedicated EU-level tool to address insufficient cooperation by visa-required third countries in related areas such as border management, security, the fight against illegal migration and migrant smuggling. Without EU action, the common visa policy would be less able to respond coherently to such challenges, which may affect the security of the Schengen area and increase migratory pressure at the EU's external borders.

No comment – not our area of expertise.

3. The current Visa Code does not provide a clear EU-level mechanism that allows for the suspension, rejection or restriction of visa applications from specific categories of travellers in response to unforeseen events, including hostile actions by third countries, hybrid threats, information manipulation and interference, the instrumentalisation or weaponisation of migration, acts of sabotage, espionage or open aggression. Recent developments have shown that this restricts the EU's preparedness and ability to react swiftly and coherently where the continued issuing of visas for certain categories of travellers may no longer be appropriate because of risks to public policy, internal security or the international relations of Member States. Without EU action, responses would remain fragmented and less predictable, reducing the effectiveness of visa policy as a common tool to protect the Schengen area and defend EU interests.

What might these categories be? We endorse a more risk-based approach, and – where overriding considerations permit – more transparency as to current criteria assessment, as this will go some way to address any residual or persistent view that there is institutional prejudice against certain nationalities.

We should recognise that companies may need support to avoid becoming unwitting participants in problematic travel, so may benefit from advice as to screening and pre-application processes: more dialogue about risk we are seeking to manage would be warmly welcomed by good faith actors in the outbound industry. If the EU can provide leadership to complement any efforts made at MS level this would be welcome.

Consideration should also be given to those visiting on a temporary basis for work that requires travel to Schengen. These could include performing artists, those whose expertise and/or experience is necessary to the delivery of shows and similar, and non-Schengen nationals such as tour guides and interpreters whose presence accompanying groups of visitors ensures the smooth running of group tourism from China.

4. *Business travellers acting on behalf of trusted companies generally present a lower risk profile and are reliable, but there is currently no common EU approach to identifying such travellers or their corporate sponsors. Some Member States have national or sector-specific facilitation schemes, but these do not have Schengen-wide effect. This creates fragmentation for companies active across the EU, as their employees may face different procedures, requirements for supporting documents, and processing conditions depending on which Member State is competent for the application. Without EU action, reliable business travellers would continue to lack predictable facilitation measures across the Schengen area, limiting the contribution of visa policy to doing business, attracting talent and boosting the competitiveness of the single market.*

Agreed. This presents an opportunity, and we recommend more dialogue with operators working in the MICE segment. This is not just about business travellers, but also about businesses buying group travel, such as incentive travel rewarding employee performance. Given structure of such programmes, with the successful candidates named relatively close to intended departure date, it is necessary to design systems that can process numerous applications quickly. In general, MS capacity to cope with variable demand is sub-optimal.

5. *The Visa Code already allows local adaptations, for example as regards supporting documents or the issuing of multiple-entry visas. However, these adaptations are not always used in a sufficiently coherent or strategic way to reflect common EU priorities. This may lead to diverging practices between consulates and limit the ability of local visa rules to respond consistently to migratory or security risks, to cooperation on readmission, concerns about the security of documents or the wider external-relations context. Without EU action, local adaptations may continue.*

Agreed. The range of supporting documentation needed appears to differ for no apparently rational reason. The impression given is that it is a matter which will remain subject to national caprice and preference, which undermines any effort to present a strong family resemblance in approach to market on the part of Schengen states.

6. The Visa Regulation allows Member States to maintain or grant certain exemptions from the short-stay visa requirement, for example for holders of diplomatic or service passports. This can become problematic when EU-level restrictive visa measures are adopted under the Visa Code against a third country or specific categories of its nationals. If bilateral exemptions continue to apply to categories of persons targeted by EU-level measures, they could create loopholes, lead to divergent treatment by different Member States and weaken the common EU policy towards the third country concerned. This may reduce the coherence, credibility and effectiveness of restrictive visa measures, in particular where such measures are intended to improve cooperation, respond to security concerns or protect the interests of the Schengen area. Without alignment between the Visa Code and the Visa Regulation, EU-level measures could therefore be applied unevenly and have a weaker practical and political effect.

No comment – not our area of expertise.

7. Successive legislative developments in the EU's visa rules have made it necessary to correct certain technical inconsistencies in the Visa Code, including outdated references and procedural provisions that are no longer fully aligned with related instruments. This may create legal uncertainty and make the common rules less clear for visa applicants, Member States' consulates and EU agencies, in particular in the context of the digitalisation of visa procedures.

These issues affect Member State authorities, visa applicants, businesses, tourists and non-EU partner countries. Without EU action, the common visa policy would be less able to respond coherently.

Agreed. More clarity, simplification and harmonisation are necessary. The businesses affected include agents whose primary interest is making a sale. They are highly influential on client choice. It is not sufficient to improve process; we need to reassure the market and ensure we have the capacity and the will to do so.

As above, more dialogue (which ETOA can support) between visa-issuing states, their appointed visa agencies and the outbound operators is advisable to address any misconceptions and adapt processes to suit demand, rather than constrain or displace demand through maladapted process. Visitors have options.

ETOA Resources

ETOA's website includes various materials on topic, including general statements of our goals:

<https://www.etoa.org/operating-in-europe/visas-and-borders/>

We shared a recent report during an India-focused programme earlier this year, comparing European visa facilitation in India unfavourably with that in Asia generally:

https://www.etoa.org/wp-content/uploads/20260209.Showcase_India.Visa_webinar.pdf

In November 2026, we will re-run a survey of market perception of visa facilitation in key Asian markets.

We are at the Commission's disposal for any opportunity to contribute industry insight or take part in joint work on topic.

Contact: policy@etoa.org

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