

Position of the European Tourism Manifesto stakeholders on Modernising the EU's policy on short-stay 'Schengen' visas

The urgent implementation of a smart visa policy presents an opportunity to strengthen Europe's competitiveness and to stimulate economic growth and job creation

The undersigned stakeholders welcome the organisation of this consultation, which is a valuable opportunity to re-evaluate the common visa policy as **not only** a tool to address security concerns, but **also to maintain freedom of movement within the Schengen Area and minimise the deterrence to legitimate travellers whether for leisure or professional purposes**. Achieving smarter Schengen visa policies is one of the priorities of the tourism sector as stated in the [European Tourism Manifesto for Growth and Jobs](#) under the 'Competitiveness' EU policy area.

The tourism sector currently makes a total contribution of 10.2% of EU-28 GDP while supporting 11.6% of total employment (26.5 million jobs).¹ The proportion of visitors originating from visa-requiring markets is still small. Those source markets have huge potential for growth for the EU, but also for other competing destinations. The process and policies for obtaining visas are key determinants in the traveller's destination selection. They also have a strong influence on agents and operators that have a commercial incentive to recommend destinations whose entry requirements are easily managed. For as long as deterrence remains, alternative 'easier' destinations will benefit through repeat and referred business and the economic loss to the EU will grow geometrically.

Therefore, we would like to underline the **URGENCY of this reform**. To avoid a large and growing loss of opportunities, especially from long-haul markets such as China, Middle East and India and ensure a sustainable growth of the tourism sector, it is imperative that the EU's visa policies are improved and modernised as soon as possible.

We would like to propose the following solutions by answering the six questions addressed to the stakeholders.

¹ World Travel & Tourism Council (2017), Travel & Tourism Economic Impact 2017 European Union, WTTC, London. [Available here](#)

Question #1: In order to minimise as far as possible **administrative burdens** for consulates and applicants alike, and facilitate tourism and business travel, what procedural requirements, in your view, should be revised? Could some procedural requirements be reduced or increased depending on the overall relation between the third country and the EU?

The main improvements in the current procedures should address:

- **Reducing the documentation requirements for applications and fully harmonising the procedure** (and the list of supporting documents required) among all Schengen States. The current situation in which the requirements are “more or less” the same is confusing to potential travellers, and does not allow for the creation of one single point of information. Streamlined documentation in multiple languages available on a clear official website is a must. Applicants should be allowed to submit their applications online including supporting documents (copies of supporting documents should be accepted). Reasonable flexibility (as regards to e.g. proof of accommodation) should be incorporated in the procedures.
- **Reducing the processing time of the applications while providing more clarity on the time frames:** more predictable time frames on visa processing could facilitate travel planning and help manage applicants’ expectations. Due regard should be had to sharp variation in seasonal demand in individual source markets in order to plan appropriate processing capacity.
- **Allowing applicants to apply for their visa up to a year ahead of their date of intended travel:** this will enable tourists to plan their trips better in advance, and in a more cost-efficient manner.
- **Allowing applications at other Schengen consulates and External Service Providers that are nearer to applicants’ homes:** this would enable easier access for potential travellers. A Schengen visa application should be possible in the facilities of every Schengen country. This would considerably reduce the costs (in accommodation and travel expenses) related to the visa application for potential travellers, in case they are obliged to present their applications in consulates located far away from their residence.
- **Issuing short-term single-entry visas at the borders on arrival:** this has already proven to be an efficient way to bring more tourists to certain areas.
- **Issuing multiple-entry visas valid for at least three years for regular travellers.**
- **Facilitating cooperation with External Service Providers and the collection of biometric identifiers** (e.g. could be done by external service providers, even if it is the first time the traveller is requesting a visa);
- **Making it easier for applicants registered in the Visa Information System (VIS) to renew their visas** (e.g. remove requirement to appear in person when lodging the application), **and for returning travellers to obtain new visas** (e.g. extend the period of conservation of fingerprints). Additionally, more **transparency** with the VIS system is desirable to know how much time is left before applicants have to renew biometrics.
- **Improving the customer service in consulates / visa applications centres:** These are sometimes the first point of contact of travellers with Europe and can have a lasting negative impression.

Question #2: In order to address the current divergent practices in issuing multiple-entry visas (MEVs) with long validity, potentially leading to visa shopping and competition among Member States, should a more harmonised implementation be ensured?

MEVs are crucial for the tourism industry – they encourage return travellers to the Schengen region. By **extending the validity of the MEV**, it can become a tool to attract travellers who visited the area, were happy with their holidays and want to come back and explore more. Return travellers know the destination better and are more confident and keen to explore lesser known places. In times when many European capitals are struggling with mass tourism, **MEVs could be a valid tool stimulating sustainable tourism development.**

We support the proposed mandatory issuance of MEVs proposed by the European Commission in the Visa Code recast proposal for a harmonised implementation. We also stress **the importance of the harmonised list of supporting documents** for both single-entry and multiple-entry visas.

MEVs would also reduce the administrative burden for Members States and applicants alike, and bring down the overall cost for potential travellers. Integrating MEVs with certain validity for VIS registered regular travellers into the Visa Code would help reduce Member States' consular costs and, through harmonisation of the rules, avoid visa shopping. MEVs should be attributed to all VIS registered regular travellers independently from the country where they come from. This will simplify the procedures in the consulates while addressing the risks of irregular immigration.

Which criteria should determine decisions on issuing MEVs and their validity period?

As per Visa Code recast proposal².

Question #3: The current level of the standard visa fee (EUR 60) has not been revised since 2006 and is relatively low compared to other countries. Is there (new) evidence for revising the fee? How should the appropriate level of the fee be determined?

The **relatively low visa application fee compared to other countries is a competitive advantage for Europe** as a tourist destination. Reduced visa application fees are a widely observed measure with clear benefits. The European Travel Commission's Schengen visa report from 2015³ examines 54 case studies which clearly demonstrate the negative impact of measures of tightening visa policies, one of which is increased fees. The EU should not increase the fee when other competing destinations are doing the opposite.

When evaluating the fee, policy makers should keep in mind that handling the visa application can often be very cumbersome for potential tourists, and indirect costs are substantial (e.g. in vast countries like China and Russia where applicants may need to present in person, travel and accommodation costs add substantially to the visa application fee). The *European Commission impact assessment study supporting the review of the Union's visa policy to facilitate legitimate travelling* showed that total visa cost for visa applicants from China can be anywhere from €90 to € 620. Thus, the standard of living in the given country, as well as additional costs for potential

² Please refer to the document REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the Union Code on Visas (Visa Code) (recast) {SWD(2014) 67 final} {SWD(2014) 68 final}, pages 50-51. [Available here.](#)

³ "Improving the Visa Regimes of European Nations to Grow Tourism", Oxford Economics, 2015. [Available here.](#)

travellers (ESP service fees, travel medical insurance, cost of obtaining supporting documents, etc.) should be considered when establishing the fee.

Tourism brings numerous economic benefits to the destination, and **the visa fee should therefore be seen as an investment in tourism from third markets**. International competition on visa fees (also bearing in mind that many destinations do not require a visa, offering e-visa or visa on arrival instead) should also be taken into account.

What would be the likely impact of increasing the visa fee (and as a consequence the service fee)?

An increase in visa fees will tend to lead to a decrease in number of travellers to the EU from third-country nationals (TCN) requiring a visa.

Question #4: External Service Providers (ESPs) are used by all Member States for providing information to travellers, collecting visa applications and returning travel documents to the applicants. What is your overall assessment of the use of outsourcing in the visa procedure? How should the regulatory framework for outsourcing evolve? Is there a need to strengthen the monitoring of ESPs?

Europe is the most visited tourist destination worldwide, and more than 50% of the travellers coming from third markets require a visa⁴. It is obvious that **part of this should be outsourced**. The simpler the procedures, the better ESPs would work.

ESPs should be monitored to ensure that service quality remains high. They should also be requested to better **plan their human resources to effectively deal with the surges in visa demand**.

Question #5: New IT solutions would allow for a full digitalisation of the visa application process. This could include the issuing of digital visas instead of physical visa stickers and the possibility for applicants to apply online, including by paying the visa fee online and submitting scanned copies of supporting documents. Should these options be explored in greater detail? What are the most important issues that should be examined in this context?

The above mentioned options should be explored in greater detail. From our perspective, the most important issues that should be examined in this context are:

- Simple application available in all official languages of the third-country nationals requiring a visa
- Possibility to submit supporting documents electronically
- Possibility to carry out online/video interviews
- Shorter processing of visa applications (pre-screening, fast-track, etc.)
- Cost savings for consulates and thus visa applicants

⁴ "Improving the Visa Regimes of European Nations to Grow Tourism", Oxford Economics, 2015. [Available here](#).

- Better aggregated data collection

Should e-visas be adopted, the European Commission should make sure that the process runs smoothly, the procedure is user-friendly and has the potential to be integrated with other technology solutions to improve travellers' experiences (e.g. reduce queues at border control).

Question #6: The current visa policy is founded on a differentiation of visa-free and visa-required countries, based on the traveller's nationality. Is the approach exclusively based on nationality still the right one? Should a more flexible approach based on differentiation among individual travellers be considered, taking advantage of new border management solutions being implemented (EES, ETIAS)?

A more flexible approach should result in less cumbersome procedures for some travellers, without jeopardising the clarity and harmonisation of the process (which are widely recognised best practices).

As for ETIAS, we see it as an opportunity to allow Europe to liberalise its visa requirements. ETIAS is a security screening tool, and can be a deterrent – one more burden in the planning session of a trip to Europe, and could negatively affect destination competitiveness. Should it result in a more open visa policy though, the benefits for the EU economy could be immense. According to the European Travel Commission's study, if we open our continent to visa-free travel from 10 key source markets, **Europe will gain 84 million additional arrivals, an additional €114 billion in expenditure, and more than 600,000 new jobs**⁵. It should improve data collection and minimise the risk that temporary border controls within the Schengen zone would be introduced; these are highly disruptive.

⁵ "Improving the Visa Regimes of European Nations to Grow Tourism", Oxford Economics, 2015. [Available here](#).

About the European Tourism Manifesto for Growth & Jobs

For the first time ever, Europe's public and private tourism actors and stakeholders with an interest in tourism have come together to call for the European Union to do more for this important sector. The **European Tourism Manifesto for Growth and Jobs** highlights the key EU policy priorities for the sector in the coming years on topics ranging from skills and qualifications to sustainability and competitiveness of Europe's tourism.

Over **40 European organisations** have already signed up to the Manifesto which seeks to ensure that the continent remains an attractive destination and that the sector continues to make a significant contribution to the EU economy.

The Manifesto focuses on the following **8 key policy priorities**:

- Competitiveness
- Digitalisation
- Good governance
- Joint promotion
- Reduce seasonality
- Skills and qualification
- Sustainability
- Transport connectivity

You can find the full online version here: www.tourismmanifesto.eu

List of signing organisations/ associations

- **ACI EUROPE** (Airports Council International)
- **A4E** (Airlines For Europe)
- **Amadeus** (Multinational IT Provider for the Global Travel and Tourism Industry)
- **Confturismo Confcommercio** (Unified Grouping of Italian National Organisations Representing Enterprises and Professions in Tourism)
- **EAAM** (European Association of Aquatic Mammals)
- **EARTH** (European Alliance for Responsible Tourism and Hospitality)
- **ECF** (European Cyclists' Federation)
- **ECTAA** (The European Travel Agents' and Tour Operators' Association)
- **ECTN** (European Cultural Tourism Network)
- **EDEN** (European Destinations of Excellence)
- **EFCO & HPA** (European Federation of Campingsite Organisations and Holiday Park Associations)
- **EFFAT** (European Federation of Food, Agriculture and Tourism Trade Unions)
- **EGWA** (European Greenways Association)
- **ENAT** (European Network for Accessible Tourism)
- **ERF** (European Road Union Federation)
- **ESPA** (European Spas Association)
- **ETC** (European Travel Commission)
- **ETF** (European Transport Workers' Federation)
- **ETLC** (European Trade Union Liaison Committee on Tourism)
- **ETOA** (European Tourism Association)
- **ETTSA** (European Technology and Travel Services Association)
- **EUFED** (European Union Federation of Youth Hostel Associations)
- **Eurail Group** (The Organization Marketing and Managing the Eurail Pass)
- **Euro Disney S.C.A.** (Operator of Disneyland® Paris)
- **EuroGites** (European Federation of Rural Tourism)
- **Europa Nostra** (The Voice of Cultural Heritage in Europe)

- **European Boating Industry** (Organization Representing the Interests of the European Leisure Marine Industry)
- **Federturismo Confindustria** (National Travel and Tourism Federation)
- **FEG** (European Federation of Tourist Guide Associations)
- **FEST** (Foundation for European Sustainable Tourism)
- **Global Blue** (Tourism Shopping Tax Refund Company)
- **HOTREC** (Hotels, Restaurants and Cafés in Europe)
- **IAAPA** (International Association of Amusement Parks and Attractions)
- **IRU** (International Road Transport Union)
- **ISTO** (International Social Tourism Organisation)
- **NECSTouR** (Network of European Regions for Sustainable and Competitive Tourism)
- **OTIE** (Observatory on Tourism in the European Islands)
- **Pearle***-Live Performance Europe (European federation in the Performing Arts and Music Sector)
- **Startup Turismo** (Italian Tourism Startup Association)
- **Tourism Society Europa** (Membership Body for People Working in all Sectors of the Visitor Economy)
- **UNI Europa** (European Trade Union Federation for Service Workers)