

NET position on Multiple-entry visas

NET, the Network for the European Private Sector in Tourism, a high-level contact group comprising various trade associations, namely, CLIA, ECTAA, EFCO&HPA, ETOA, EUROGITES, HOTREC, IAPAA, and IRU takes note of the Commission proposal amending Regulation (EC) No 810/2009 establishing a Community Code on Visas (Visa Code) – ([COM\(2018\)252 final](#)).

We commend the efficiency with which consultation was concluded and a legislative proposal issued. Given the Commission’s intention to develop economic relations with visa-requiring origin markets we suggest some further refinement may achieve the desired result: facilitation of legitimate travel and its accompanying economic benefit; smart management of borders and security.

On the specific topic of Multiple-Entry Visas, NET has the following comments:

- The Commission impact assessment states that the low share of MEV among the total numbers of visas issued imposes unnecessary restraints to further growth of the industry and that it limits competitiveness¹;
- The impact assessment also recognises that another consequence of the low volume of MEV with long validity is that frequent travellers have to apply repeatedly for a visa, which represents an unnecessary administrative burden not only to travellers but also to consulates, with neither economic nor security benefit ²;
- It also acknowledges that the standard validity of visitor visas issued by the United States and Canada and in China is of 10 years’ duration – these countries argue that security is not compromised if checks in databases are continuously performed³;
- For all these reasons, NET supports the idea that **MEVs should be extensively used by Member States. Recognising MEVs’ potential utility in encouraging repeat travel among a desirable economic demographic, NET has serious concerns with regard to the strict cascade criteria proposed by the Commission**⁴:

¹ Page 15 of the Impact assessment: [link](#)

² Same reference as previous one

³ Page 14 of the Impact Assessment

⁴ The Commission proposes the following criteria for MEVs (art. 24):

Multiple-entry visas with a long validity shall be issued for the following validity periods, unless the validity of the visa would exceed that of the travel document:

- (a) for a validity period of one year, provided that the applicant has obtained and lawfully used three visas within the previous two years;
- (b) for a validity period of two years shall be issued, provided that the applicant has obtained and lawfully used a previous multiple-entry visa valid for one year;
- (c) for a validity period of five years, provided that the applicant has obtained and lawfully used a previous multiple-entry visa valid for two years.”;

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- Given probable patterns of leisure travel from successful long-haul origin markets for the EU, it would be very unlikely that a prospective visitor would meet the requirement of having used three visas within the previous two years, in order to be granted a MEV for a validity period of one year;
- The same would apply to the system of two years or five years (please see footnote below);
- We consider that the criteria are too complex to be readily understood by travellers who - we must always remember - have other options among established and fast-developing destinations keen to secure their business. They would act as a deterrent, to the Schengen zone's competitive disadvantage.
- We are unaware of any evidence or model that suggests such a complex, multi-staged approach would positively affect security outcomes.

NET trusts that these comments will be taken into consideration by the Council.

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