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**COMMISSION STAFF WORKING DOCUMENT**

**IMPACT ASSESSMENT REPORT**

***Accompanying the document***

**Proposal for a Regulation of the European Parliament and of the Council**

**amending Regulations (EC) No 767/2008, (EC) No 810/2009, and (EU) No 2017/2226 of the European Parliament and of the Council, Council Regulations (EC) No 1683/95, (EC) No 333/2002, (EC) No 693/2003 and (EC) No 694/2003 and Convention implementing the Schengen Agreement, as regards the digitalisation of the visa procedure**

{COM(2022) 658 final} - {SEC(2022) 202 final} - {SWD(2022) 659 final}

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## Glossary

| Term or acronym | Meaning or definition |
|---|---|
| BCP | Border control post |
| CBA | Cost-benefit analysis |
| EBCGA | European Border and Coast Guard Authority |
| EDPS | European Data Protection Supervisor |
| EES | Entry-Exit System |
| ESP | External Service Provider |
| ETIAS | European Travel Information and Authorisation System |
| EU | European Union |
| eu-LISA | European Union Agency for the Operational Management of Large-Scale IT Systems in the Area of Freedom, Security and Justice |
| FRA | Fundamental Rights Agency |
| GDPR | General Data Protection Regulation |
| IT | Information Technology |
| Member States | EU Member States applying the common visa policy in full (all EU Member States with the exception of Bulgaria, Croatia, Cyprus, Ireland and Romania) as well as the Schengen associated countries: Iceland, Liechtenstein, Norway and Switzerland. As in the Visa Code, "Member States" in this report will designate Member States |
| MEV | Multiple-entry visa (short-stay visa allowing for an unlimited number of entries to the Schengen area during its period of validity and respecting the overall maximum period of stay, i.e. 90 days in any 180-day period) |
| N/A | Not available |
| Privacy enhancing | Privacy-enhancing computation refers to a group of various technologies that help to achieve the highest level of private data protection. |
| Schengen evaluation | periodical evaluations of Member States on the application of the Schengen acquis in the field of the common visa policy, in accordance with Council Regulation (EU) No 1053/2013 |
| Service fee | Fee paid to the ESP for collecting the application and biometric identifiers |
| SIS | Schengen Information System |
| TCN | Third Country National (i.e. citizen of a country outside the Schengen area) |
| TFEU | Treaty on the Functioning of the European Union |
| VAC | Visa Application Centre (i.e. the facility operated by external service providers) |
| VIS | Visa Information System |
| VIS Regulation | Regulation (EC) No 767/2008 of the European Parliament and the Council of 9 July 2008 concerning the Visa Information System (VIS) and the exchange of data between Member States on short-stay visas (VIS Regulation) |

| | |
|---|---|
| Visa Code | Regulation (EC) No 810/2009 of the European Parliament and the Council of 13 July 2009 establishing a Community Code on Visas (Visa Code) and Regulation (EU) 2019/1155 of the European Parliament and of the Council of 20 June 2019 amending Regulation (EC) No 810/2009 establishing a Community Code on Visas (Visa Code) |
| Visa fee | fee paid to the consulate for processing the visa application |
| Visa | short-stay visa as defined in Article 2 (2)(a) of the Visa Code (authorising its holder to stay in the Schengen area for up to 90 days within any 180-day period) |

# 1. INTRODUCTION: POLITICAL AND LEGAL CONTEXT

## 1.1. General Background

The March 2018 Commission communication[1] on visa policy took on board the idea of "e-visas" following earlier discussions in 2017 under the Estonian Presidency. The communication announced a feasibility study on digital visa procedures and the intention to assess options and promote pilot projects which would prepare the ground for future proposals.

When revising the EU Visa Code in 2019, the EU co-legislators explicitly stated the aim of developing a common solution in the future to allow Schengen visa applications to be lodged online, thereby making full use of the recent legal and technological developments[2]. The COVID-19 pandemic, which led to the slowing down of Schengen visa operations worldwide partly due to the difficulty of receiving visa applicants in consulates, prompted Member States to call upon the Commission to speed up work on digitalisation of visa procedures. The New Pact on Migration and Asylum proposed by the Commission on 23 September 2020 set the objective of making the visa procedure fully digitalised by 2025, with a digital visa and the ability to submit visa applications online.

Given the various advantages offered by digitalisation of visa procedures (increased security, reduced administrative costs, growing trend toward digitalisation), large visas-issuing countries, such as Australia, New Zealand, UK, India or Russia, have already implemented digital visas for short stays on their territories as shown in Annex 5. The majority of these digital services are however more similar to the European Travel Information and Authorisation System (ETIAS). They have been introduced to either pre-screen visa exempt travellers prior to travel (Electronic Travel Authorisations) or to facilitate certain foreign nationals subject to visa requirements, in quickly and easily obtaining a short stay visa for specific purposes. Only Australia and New Zealand have fully digitalised the visa procedures for all applicants, irrespective of nationality or travel purpose.

The initiative on visa digitalisation is included in the Commission Work Programme for 2021 (Annex I). The initiative also fits with the general EU approach to encourage the modernisation and digitalisation of public services and the Commission communication[3] on the *2030 Digital compass: the European way for the digital decade*.

In this context, a decision was taken by the Commission to consider the proposal for the digitalisation of visa procedures as a new initiative and not as a revision of the Visa Code and of the VIS regulation. The initiative aims at modernising and simplifying the implementation of visa policy and is part of a broader effort to digitalise public administrations. The study on the digitalisation of visas procedures carried out in 2019 by the Commission highlighted the potential benefits of simplified and more modern visa procedures[4]. To do so, the initiative will only modify certain articles of the Visa Code and

[1] COM(2078)251.
[2] Recital 20 in Regulation (EU) 2019/1155.
[3] COM(2021)118.
[4] Study on the feasibility and implications of options to digitalise visa processing, 2019, available: https://op.europa.eu/s/pgU6

the VIS regulation as far as it is necessary to implement this initiative and will not touch other aspects of the Visa code and the VIS regulation not concerned by this initiative.

The digitalisation of the visa application procedure and the implementation of a digital visa would benefit from several major developments in the field of visa and border policy:

- The revision of the Visa Code in 2020 made it easier for regular travellers to apply for multiple-entry visas, and allowed electronic visa applications (used by a few Member States) and electronic signature (not used by Member States so far).
- The revised VIS Regulation agreed by the co-legislators in December 2020[5].
- The European Travel Information and Authorisation System (ETIAS)[6] is part of the Smart Border and Interoperability framework and introduces an online travel authorisation for third country nationals who are not visa-required. This travel authorisation differs from the visa procedure which requires submission of the biometrics and physical presence of applicants to mitigate the higher security risks of visa-required third countries.
- The Entry-Exit System (EES) will be operational in 2022. The EES will require every traveller visiting the Schengen area for short stays to record his/her entry and exit at the external border crossing points allowing to detect over-stayers[7].

However, with the exception of the VIS, the harmonised rules governing the common visa procedures still largely relies upon physical presence of the applicant and physical documents. In spite of partial digitalisation efforts by Member States, applicants still have to print and sign the form and submit it in paper together with the supporting documents and travel document. The physical dimension of the visa sticker, which has to be affixed on the holder's travel document or on a separate sheet in case the travel document is not recognised by a Member State, entails another set of challenges.

### 1.2. Scope of the initiative

The initiative focuses on the short-stay visas application process and the visa sticker. Although the examination and decision on the visa application are an important part of the visa application process, they fall outside the scope of this impact assessment.

This initiative is focused on short-stay visas, but due to the existence of a common legal basis[8] on the format of short-stay visas and long-stay visas, this initiative will also explore the material scope, i.e. whether to extend the two novelty of this initiative, the application platform and the digital visa, to long-stay visas, which are national visas allowing to stay on the territory of the issuing Member State

[5] The revised VIS regulation will allow more thorough background checks on visa applicants, close security information gaps through better information exchange between Member States, broaden the Visa Information System to include long-stay visas and residence permits, and will allow combatting abduction and trafficking of children by lowering the fingerprinting age for minors. Together with the other new and upgraded information systems, the new Visa Information System should be operational and fully interoperable by the end of 2023.
[6] ETIAS legal basis : https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32018R1240.
[7] EES will be interoperable with VIS and the other EU information systems so that all information is cross-checked (e.g. the systems will provide information as to whether a visa holder has already a file in EES.
[8] Council regulation (EC) 1683/95 https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX:31995R1683.

for a period longer than 90 days. The possibility to include long-stay visas in the material scope of this initiative is analysed in section 8.2 of this impact assessment.

## 2. PROBLEM DEFINITION

### 2.1. What are the problems?

Citizens of 102 third countries are currently required to hold a valid visa in order to cross the EU external borders[9]. Visas are issued by Member States through a network of consulates in third countries[10]. The figure below shows the total number of short-stay and long-stay visas applications submitted and issued by Member States in 2019. In the projections used in this impact assessment[11], the number of short-stay visas would increase until 2025 and stabilise at 17.8 million visas applied per year.

***Table 1**: Total number of visa applications 2019*

| Item | Figure |
|---|---|
| Schengen visa applications submitted | 16 955 541 |
| Long-stay visa applications submitted | 2 642 538 |
| Schengen visas issued (including LTVs, MEVs) | 15 022 255 |
| Long-stay visas issued | 2 448 004 |

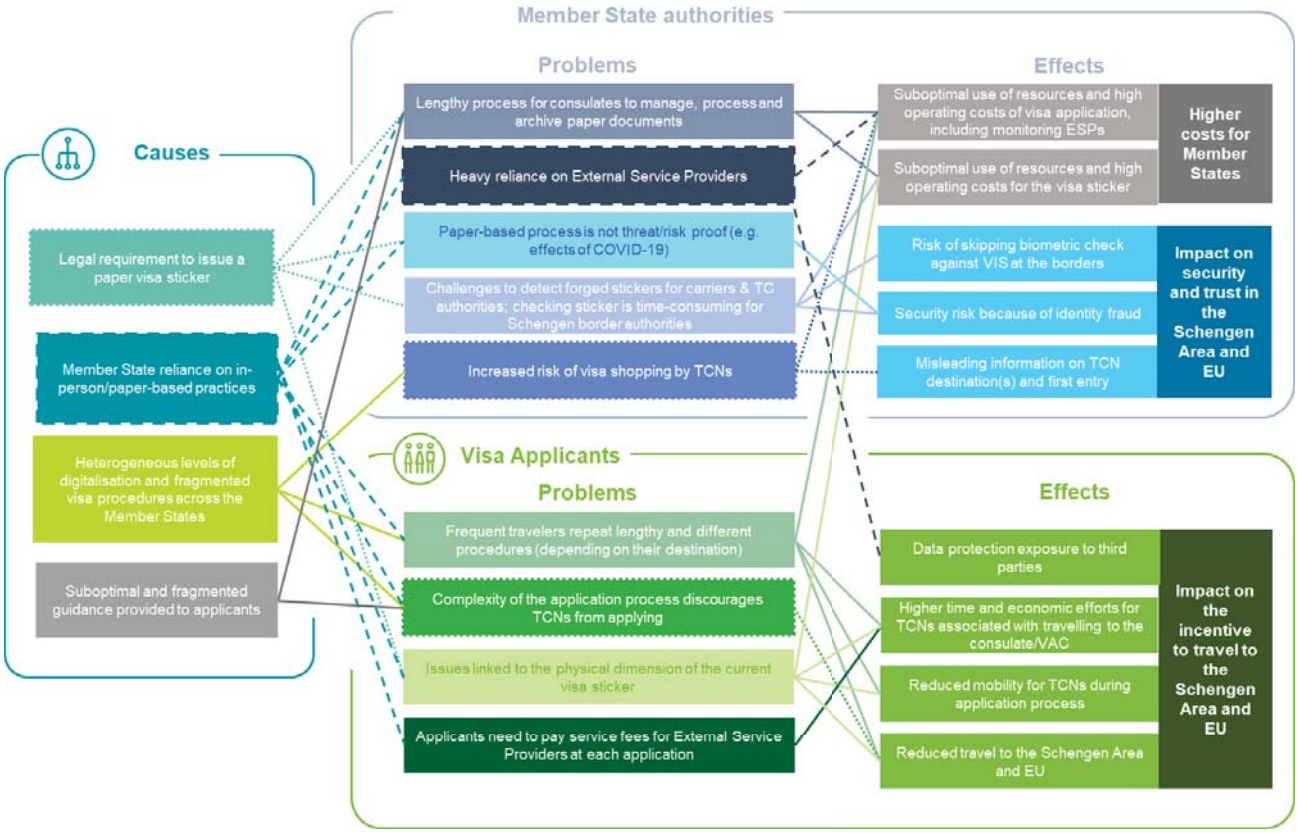
*Source: EU statistics and data collected from Member States authorities*

The amended Visa Code has created the possibility for the digital submission and processing of visa applications (e.g. electronic signature for applicants), but most Member States only digitalised parts of the Schengen visa process[12] and still rely heavily on paper-based procedures. This is because the whole visa process as envisaged by the Visa Code remains largely paper based and the obligation to issue a visa sticker has also constrained digitalisation efforts of Member States.

The figure below describes the causes, problems and effects in relation to visa procedures identified in the context of this impact assessment.

[9] Annex I to Regulation (EU) 2018/1806 of the European Parliament and of the Council of 14 November 2018 listing the third countries whose nationals must be in possession of visas when crossing the external borders and Annex II listing those whose nationals are exempt from that requirement.
[10] Member States can agree bilaterally to be represented by another Member State in a third country through representation agreements. This means that not all Member States have consulates in all visa-required third countries.
[11] Study to assess the various options related to visa process digitalisation and to support the preparation of an impact assessment - Final Report available: https://ec.europa.eu/home-affairs/study-assess-various-options-related-visa-process-digitalisation-and-support-preparation-impact_en. The number of visas issued was estimated to come back in 2023 to its pre-COVID level (16.9 million), then grows until 2025 where it would stabilise at 17.5 million until 2029.
[12] Cf. Annex 2 on the state of play of digitalisation of the visa application process across Member States.

**Figure 1**: The causes, problems and effects




### *1.1.1. Problems identified in relation to Member States*

The main problems identified in relation to Member States authorities dealing with visa application and visa issuing are:

- **The lengthy process and accumulating costs for consulates to manage, process and archive (and eventually destroying) paper documents.** This problem is linked to practices of Member States which have not or have only partially digitalised their application procedure. Additionally, current short-stay visas rules at EU level still allow the use of paper documents and do not impose any digitalisation obligation to Member States. This contributes to a fragmented use of digitalisation tools by Member States and high costs associated with handling paper applications that need to be archived for at least two years before they can be destroyed. It is estimated that Member States would spend EUR 638.5 million on administrative burden in the period 2025-2029 under the baseline scenario (see table 4).

- **The dependence of Member States on external service providers (ESPs)** to fulfil their obligations relating to visa management in a context of increase of visa applications and the obligation for third country nationals to visit the consulate or the Visa application centre (VAC) each time they need to apply. On average, 90% of short-stay visas application are submitted through ESPs, which automatically triggers exposure of personal data to third parties. This

involves large-scale contracts and monitoring costs and additional costs for visa applicants[13]. This also means that Member States largely rely on ESPs to deal with questions from applicants not only regarding their application and its status, but in addition answering questions on general procedures for applying, which can lead to different interpretation of the rules by ESPs and heterogeneous information provided to applicants.

- **The paper-based process is not threat/risk proof.** The COVID-19 pandemic had a substantial impact on visa procedure as it requires systematic physical displacement of the applicant when applying for a Schengen visa. Visa holders who were already in the Schengen area during the outbreak of the pandemic but were not able to travel back due to worldwide travel bans, had difficulty obtaining an extension of their visa. Because of the pandemic control measures taken by Member States (lockdowns, reduction of public services, teleworking, etc.), applying for an extension and affixing a visa sticker in the passport was a challenge for both visa holders and Member States. This experience shows the vulnerability of the current visa procedure to unexpected events such as large-scale health crises, localised emergencies or other disruptions as it still relies heavily on visits of applicants to the consulate or VAC.

- **The physical visa sticker is prone to falsification and fraud (e.g. forgery and counterfeiting), which represents a security risk**[14]. Since their introduction in 1995, the visa sticker has been counterfeited or falsified. The visa sticker is vulnerable to fraud, and this is substantiated by the fact that over time more security features have been introduced, the latest being the introduction of a signed 2D-barcode on the visa sticker which will enter into force on 1 May 2022. In recital 2 of the Commission Implementing Decision of 30.4.2020 introducing a digital seal on the uniform format for visa[15] it is expressly mentioned that *"The newest generation of the visa sticker has already been compromised, with many counterfeits detected in Member States. Additional rules should therefore be laid down to enhance the security of the visa sticker and to prevent further forgery"*. Although visa stickers security features enable border and police officers to check whether the sticker is authentic, there is no guarantee that officers will systemically detect counterfeiting. Moreover, stickers may be lost or stolen and reused illegally (washed and re-written). Furthermore, at the border, the examination of the sticker itself is a time-consuming task for border authorities.

- **Increased risk of visa shopping by applicants**: While the very large majority of visa holders follow the rules, abuses can also take place. Visa shopping has taken different forms over the years. Before the implementation of VIS, visa shopping mainly involved applying for a visa from several Member States. Since the VIS came into force, this is no longer possible as Member States are able to see if an applicant has also lodged an application for another Member

[13] Remuneration of ESPs is fully ensured by service fees paid by applicants. Member States costs relating to ESPs only consist in monitoring and management of contracts and in equipment/software put at the disposal of ESPs, depending on the contract specifications.
[14] The susceptibility to fraud of the visa sticker is substantiated by the Commission Implementing Decision C(2020)2672 of 30.4.2020 introducing a digital seal on the uniform format for visas. This implementing decision was adopted after many forgeries of the new visa sticker were discovered in Member States shortly after its introduction (December 2019).
[15] C(2020)2672 final.

State when they register it in the VIS. However, the differences in taking and processing applications also give rise to visa shopping. When applying for a visa, an applicant may be attracted by short waiting times or the issuing policy of a Member State (validity of a visa, e.g. single/multiple entry). The revised Visa Code contains new provisions to further harmonise these issues. In addition, heterogeneity in the way an application can be submitted can potentially create a risk for visa shopping as applicants may choose to lodge an application at a Member State with a more digitalised application procedure. For instance, applicants might be tempted to apply for a visa to a Member State that offers an expeditious or digital visa application process instead of the Member State they intend to travel to, thereby providing misleading information on their destination(s) and/or first entry[16]. This can result in additional burdens on Member States where visa shopping is taking place.

#### *1.1.2. Problems identified in relation to visa applicants*

- **Frequent travellers need to repeat the same lengthy procedure to be able to travel to the Schengen area each time they apply**. Repeat applicants must still visit the consulate or VAC to apply for a short-stay visa as application procedures are currently partially digitalised[17]. They generally still need to print and sign the application form as no Member State is currently offering third country nationals the possibility to sign the application form using an electronic signature. They must submit it together with the supporting documents in paper and/or pay the visa fee at the consulate or VAC (only four Member States offer the possibility to upload supporting documents online whereas only three offer the possibility to pay the visa fee online). In addition, applicants might be requested to provide more information by means of additional documents or interviews which might entail another visit to a VAC or consulate. Whereas travel costs for first-time applicants are justified by the enrolment of biometrics in a controlled environment, the same does not apply to repeat applicants as their biometrics are already enrolled in the VIS and valid for five years. In nearly all cases, applicants (first time and repeat applicants) have to make another visit to the consulate or VAC to collect their travel document with the visa sticker (or refusal) or pay courier costs to have it returned. All this is exacerbated by limited consular coverage requiring sometimes extensive travels by applicants.

- **The complexity and the fragmentation of the application process** can discourage third country nationals from applying. Today, the way applicants submit their application differs across Member States, resulting in a fragmented application landscape[18] with Member States offering the possibilities to carry out none or a few application steps online. Several travel and tourism operators mentioned that practical modalities sometimes differ between (a) consulates of different Member States in the same third country; (b) consulates of the same Member State

[16] Although this remains a potential risk, it could materialise if the fragmentation between Member States continues to increase in the coming years, with some Member States offering repeat applicants a fully digitalised application process whereas they would have to travel and incur costs if they apply for a visa to a Member States that have not or only partially digitalised the application procedure.
[17] This cost was estimated at EUR 74 per applicant or EUR 74 bn in total in the context of this impact assessment (current situation – travels for first time and repeat applicants).
[18] Cf. Annex 2.

in different third countries; and (c) consulates of the same Member State in large third countries (such as Russia, China, or India). According to the travel and tourism industry representatives consulted in preparation to the impact assessment, the Schengen visa process is often considered as more complex than the processes operated by other third-countries, which might lead operators to undersell travel to the EU[19], with a potential negative economic impact for Member States. In addition, non-EU nationals exempted from the visa requirement will be able to apply for a travel authorisation to the EU through a common web portal (ETIAS) from 2023. These developments and the increasing use of e-government tools and online payment worldwide will make the current Schengen visa procedure appear increasingly outdated and fragmented.

- **Issues linked to the physical dimension of the current visa sticker.** The "physical" dimension of the visa sticker generates a certain number of problems for visa applicants:
  - **Visa applicants need to travel to the nearest consulate/VAC and leave their travel document there**. The fact that the visa sticker must be affixed to the travel document still requires first-time applicants and repeat applicants to come to the consulate or VAC to provide the travel document and collect it with the visa sticker. Although the latter group, according to the amended Visa Code, would not have to appear in person as their biometrics are already enrolled in the VIS, the current practice by Member States linked to the absence of or the very partially digitalised processes requires them to travel to the consulate or VAC to submit their travel document, pay the visa fee and sign the application form. This practice results in the same lengthy procedure, which may entail costs and a time-consuming journey, especially if the applicants live far away from the nearest consulate or VAC. For repeat applicants this means re-visiting a consulate/VAC to lodge an application and collect their travel document[20]. The cost of travel per person per application is estimated at EUR 74 (see table 4).
  - **The unavailability of the travel document during the application and examination procedure.** The applicant has to leave his or her travel document at the consulate/VAC during the examination procedure. This means that applicants cannot travel abroad during this period or even go back to their home country in case they applied in a neighbouring country because the Member State of destination neither has a consulate nor is represented by another Member State in the country of the applicant[21]. This problem can be especially critical for those third country nationals who need to travel regularly for professional purposes. 33% of the respondents to the public consultation mentioned this limitation to mobility as a key shortcoming.

[19] As pointed out by Travel and industry representatives during the consultations (see Annex 2).
[20] 34% of third country nationals responding to the public consultation confirmed that they had to travel a long distance to the consulate/VAC, and 52% of respondents defined the process as time-consuming. In some cases, third country nationals need to travel 500 km or more (including into neighbouring countries) to reach the nearest consulate/VAC, which entails expensive travel, accommodation costs and opportunity costs such as for business activities left pending. Amongst the respondents who indicated the travel distance, 10% indicated that they needed to travel for 500 km or more.
[21] For example countries like Gambia or Sierra Leone where no EU Member State is present. See Annex 28 of the Visa Code Handbook for the list of consular presence and representation.

- **The physical link between the visa sticker and the travel document.** When the travel document is stolen or lost, the visa sticker needs to be revoked in the VIS. A new application has to be submitted to obtain a new visa whereas an existing digital visa could be easily linked to a new travel document.

- **Applicants need to pay a service fee each time their application is submitted through an ESP**. This service fee, which may not exceed half of the visa fee[22], increases the overall costs of visa applications by up to 50% and can discourage applicants from applying for a short-stay visa. In third countries where the Member State of destination has no consulate and is not represented by another Member State, the service fee may, by way of derogation from this provision, amount to a maximum of 120 EUR. This dependency makes the visa procedure more costly for applicants and also exposes applicants' personal data to third parties.

#### *1.1.3. Impact of the problems identified*

All the above-mentioned problems have three main negative effects on the Schengen area:

- **Higher costs for Member States** resulting from the management of the paper based application procedure and of the visa sticker;

- **Challenges to security and trust in the Schengen area** resulting from undetected forged or counterfeit visa stickers, the risk of identify fraud and the non-systematic check of biometric data against the VIS at the border;

- **Reduced attractiveness and incentive to travel to the EU** as a destination, due to the time and costs linked to the current visa application process for visa applicants, which result in reduced mobility of potential travellers to the EU and a fragmented image of the EU to third-country nationals.

### 2.2. What are the problem drivers?

The **root causes** of the problem are:

- **The legal requirement for Member States to issue a paper visa sticker[23].** This requirement provided for by Article 29 of the Visa Code applies to all Member States. It prevents the issuance of dematerialised visas.

- **Member States reliance on in-person/paper-based practices.** Current EU legislation does not impose any digitalisation efforts on Member States as they are free to digitalise some aspects of the visa procedure or not. The amended Visa Code allows applicants to sign

[22] Article 17 of the Visa Code.
[23] The paper sticker must be affixed to the holder's travel document or on a separate sheet in case the travel document is not recognised by the Member State. The sticker includes a unique number that is also part of the corresponding record in the Visa Information System (VIS), and to be used to verify the holder's identity by competent authorities.

applications electronically if Member States recognise the electronic signature, but this possibility has not been used by Member States so far. Such digitalisation efforts were also constrained by the Visa Code provisions relying largely on paper-based procedures and consequently physical presence of the applicant (e.g. going to the consulate/visa application centre). In most cases, applicants still have to put their signature on the paper application form and submit it together with paper copies of supporting documents.

- **Heterogeneous levels of digitalisation and fragmented visa procedures across Member States**. So far EU law regulating the visa application procedure has introduced the possibility for Member States to use some digital features (e.g. electronic signature) but has left the development of any digital tools to their discretion. Without any harmonisation, Member States have digitalised their visa processes to different degrees, for various reasons. Firstly, fully digitalising the visa process requires substantial investment at national level. While some Member States have only digitalised some of the steps of the application procedure, none have digitalised the entire process (see Figure 2 below). For Member States issuing a limited number of visas, the incentive to digitalise is lower as the initial costs incurred are not offset by the number of applications processed. Additionally, as the Commission announced an initiative on digitalisation already in 2018, several Member States prefer to wait for a proposal from the Commission before investing further in it. Indeed, most Member States who have invested in digitalisation, have done so for the easiest and least expensive steps of the procedure (e.g. uploading the application form online)[24]. Therefore, applicants are confronted with very different practices depending on the Member State for which they apply[25]. For many third country nationals wanting to travel to the EU, visa policy is the first EU policy they are confronted with and this fragmentation risks damaging the coherence and visibility of the common visa policy and has a negative impact on the image of the EU.

**Figure 2**:Overview of features provided in the current online visa application portals[26]

| | Automated guidance for TCNs | Info about rules to apply | Info about next appointment | Personal account | Error detection / quality checks | Online application form | Print-out option | Data upload to VIS (for consulates) | Upload supporting documents | List of supporting documents | Online visa fee payment | Appointment management | Tick-box to certify info is correct | ESP can correct data |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| # of countries | 10 | 15 | 3 | 10 | 17 | 19 | 14 | 12 | 4 | 6 | 3 | 10 | 4 | 9 |

*Source: Member State and Member States consultation*

[24] This was confirmed during the interviews carried out in the context of this impact assessment.
[25] The state of play on digitalisation of the visa process by Member States is summarised in Annex 2.
[26] This table concerns the features of the current national online visa application portals for Member States applying in full the Schengen acquis. These figures differ from those provided in Annex 2 (section 2), which provides the same overview for all Member States that replied to the consultation, i.e. including Member States that do not yet or fully apply the Schengen acquis.

- **Suboptimal and fragmented guidance provided to applicants** with information scattered across multiple sources (websites operated by different national authorities or on the websites operated by ESPs) and information with very different levels of quality and details often without automated guidance available. This can lead to applications having to be corrected which has a cost for Member State and is not efficient for applicants. In addition, the image of the EU to travellers worldwide comes across as fragmented.

In addition to these internal issues linked to the heavy paper-based application procedure and the legal requirement to issue a paper visa sticker, external factors also contribute to make these problems more acute:

- **The increased flows of visa-required travellers to the EU.** The estimated number of short-stay visas applications submitted is difficult to predict for the 2021-2029 period, given the disruption caused by the COVID-19 crisis and its longstanding impact on travels. In the context of this impact assessment, a conservative a cautious approach has been chosen. It is reflected in the table below[27]. After the substantial decrease due to the COVID-19 situation in 2020-2021, the number of visa applications is expected to recover in 2023 to pre-COVID-19 levels (16.9 million visas applied for in 2019). Afterwards, the number of visa applications would continue to grow slightly (+3% /year) and stabilise at 17.8 million per year from 2025.

***Table 2**: Estimated numbers of short-stay visas applications 2021-2029 (baseline)*

| | 2021 | 2022 | 2023 | 2024 | 2025 | 2026 | 2027 | 2028 | 2029 |
|---|---|---|---|---|---|---|---|---|---|
| Total short-stay visas (million) | 7.5 | 11.6 | 16.9 | 17.3 | 17.8 | 17.8 | 17.8 | 17.8 | 17.8 |

- **The inadequacy between the current visa application procedure and the trend in public sector digitalisation.** In its Communication *2030 Digital Compass: the European way for the Digital Decade*[28], the Commission has set the target for 2030 to provide 100% of key public services online for European citizens and businesses. Even if not addressed to EU citizens but to third country nationals, the current digitalisation of visa procedure, relying heavily on paper would appear more and more inadequate and lagging behind the current digitalisation trend in the delivery of public services, including other key tourist destinations that EU Member States compete with.

- **The increasing demand for a seamless traveller experience.** Offering the possibility to third country nationals to travel without undergoing a cumbersome administrative procedure will contribute to the attractiveness of the EU as a travel destination. The results of the public consultation have shown that more than 50% of respondents found that the current process for applying to a Schengen visa was time consuming and 29% too complicated[29]. Difficult and

[27] Study to assess the various options related to visa process digitalisation and to support the preparation of an impact assessment - Final Report, available: https://ec.europa.eu/home-affairs/study-assess-various-options-related-visa-process-digitalisation-and-support-preparation-impact_en.
[28] https://ec.europa.eu/info/sites/default/files/communication-digital-compass-2030_en.pdf.
[29] Cf . Annex 2.1.6 Public consultation.

complex procedures discourage potential travellers, especially if they come for tourism and have the choice between several travel destinations.

### 2.3. How will the problem evolve?

The status-quo would have long-term **macro-economic impact** on the Schengen area as the promotion of the EU as a travel destination would be hampered by this situation. **Member States** would continue to develop (or not) their own online tools for visa application, resulting in a fragmented landscape of portals/tools with different levels of digitalisation which could ultimately lead to increasing visa shopping by visa applicants[30]. Depending on their Member State of destination and its degree of digitalisation of the visa application process, **third country nationals** would have in some cases to continue to use the current paper-based process, repeat applicants would have to incur travel (and potentially accommodation) costs to reach the consulate/VAC and would most likely still be obliged to sign the application form on paper[31]. Regarding **security**, the lack of harmonisation across Member States in the way supporting documents are to be submitted, would imply that consulates would continue to work with documents of different quality and reliability. The use of paper visa stickers would continue to entail a certain security risk, including blank visa stickers being stolen. Despite the recently adopted and more secure sticker format[32], visa stickers may still be subject to counterfeiting and not address identity fraud adequately. **Regarding data protection,** a status-quo would not require additional data or different data and would be neutral on data protection. As regards **other impacts**, the present fragmentation would continue to negatively affect the perception of the European Union as a single geographical entity applying a common visa policy. Third country nationals travelling to the consulates or VAC would continue to have an impact on the environment (CO2 emissions) and paper-based procedures and the use of the visa sticker would still have an effect on paper consumption.

## 3. WHY SHOULD THE EU ACT?

### 3.1. Legal basis

Article 77(2)(a) TFEU empowers the Union to develop measures concerning 'the common policy on visas and other short-stay residence permits'. Article 77(2)(b) TFEU empowers the Union to develop measures concerning 'the checks to which persons crossing external borders are subject'[33].

### 3.2. Subsidiarity: Necessity of EU action

As the Schengen visa procedure is harmonised at EU level and regulated in great detail in the Visa Code, the VIS Regulation and the uniform format for visas Regulation, the shortcomings described

[30] Applicants may select those Member States that have digitalised a substantial part of the application process as main Member State of destination even if they intend to go to another Member State.
[31] For the time being, the possibility to sign the application form electronically provided for in Article 11 and 11a of Regulation (EC) 810/2009 has not been implemented by any Member State.
[32] Commission implementing decision C(2020) 2672 final of 30.4.2020 introducing a digital seal on the uniform format for visas.
[33] Article 79(2)(a) TFEU empowers the Union to develop measures concerning 'the conditions of entry and residence, and standards on the issue by Member States of long-term visas and residence permits'. The most suitable legal basis for measures concerning stickers for long-stay visas is a joint legal basis of Articles 77(2) and 79(2) TFEU.

above are inextricably related to existing legislation. The problems elaborated in the previous sections are unlikely to disappear in the near future and they are directly related to the current legal provisions. For both aspects of the initiative (visa application procedure and format of the visa) by reason of scale, effects and impact of the envisaged actions, action to solve these problems can only be taken efficiently and systematically at EU level.

Since the objectives of this Regulation, namely, the establishment of a European online visa application platform and the introduction of a digital visa builds on other initiatives aiming, on the one hand, at streamlining and harmonising the procedures in the context of the common visa policy and, on the other hand, at aligning the travel, entry and border policy of the Schengen Area with the new digital era, the amendments of the related legislation (mostly the Visa Code and the VIS regulation) are only possible at Union level and are part of the Schengen acquis.

The subsequent analysis of the options will further demonstrate how non-EU action cannot sufficiently address the problems identified.

### 3.3. Subsidiarity: Added value of EU action

The initiative builds on ongoing initiatives looking, on the one hand, to streamline and harmonise as much as possible the procedures in the context of the common visa policy, and on the other hand, to align the travel, entry and borders policy of the Schengen Area with the new digital trends. As described below, the continuation of the baseline scenario is not going to solve the problems identified, neither in relation to Member State authorities, nor the visa applicants. Only at EU level changes can be implemented in a way that would lead to the benefits illustrated in this report. The measures that are described under the policy options are examined to make sure they do not go beyond what is needed to achieve the general and specific objectives, in order to respect the proportionality principle (see Section 7.3.3).

## 4. OBJECTIVES: WHAT IS TO BE ACHIEVED?

### 4.1. General objective

The general objective of the initiative is to simplify, harmonise and reduce the administrative burden to apply for a Schengen visa to improve the security and safety of the Schengen area.

### 1.2. General and Specific objectives

The following general and specific of this initiative have been identified:

| General objectives | Specific objectives |
|---|---|

| | |
|---|---|
| ▪ To simplify, harmonise and reduce the administrative burden to apply for a Schengen visa<br><br>▪ To improve the security and safety of the Schengen area | ▪ To streamline and make more efficient the visa application procedure for applicants and MS through digital means (SO1)<br><br>▪ To increase the security of the Schengen area through the digitalisation of the visa sticker and digitalised application procedures (SO2) |

Simplifying, harmonising and modernising the visa application process through digital means would allow addressing the problem drivers identified in section 2.2. This process of simplification, harmonisation and modernisation through digitalisation would put an end to Member States reliance on in-person/paper based practices and inconsistent levels of digitalisation. The harmonisation of procedures would address the fragmentation and complexity of visa procedures across Member States and reduce current disparities in Member States digital visa procedures (as shown in fig. 2). Achieving this objective would also contribute to address the issue of suboptimal and fragmented guidance provided to applicants and increased visa shopping by applicants through a harmonised, modern and digitalised application procedure, as visa shopping could potentially increase if ways of applying for a short-stay visa differ too much. Giving all third country nationals the possibility to apply online would decrease the reliance of Member States on ESPs and would allow third country nationals to be less dependent on ESPs services and spend less time, money and efforts to apply for a short-stay visa.

Reducing the risks of fraud, forgery and facilitating the verification process at the border through the digitalisation of the visa would virtually end the practice of attempting to enter or transit through the Schengen area with a forged or falsified visa sticker[34]. It would further improve the security of the visa whose features have been regularly upgraded to fight counterfeiting and forgery (as explained in section 2.1.1 above). It would also put an end to the issue of blank visa stickers being stolen from consulates which is frequently reported by Member States. In addition, abolishing the visa sticker and consult the VIS database to check whether a visa was granted and with what validity (also available for carriers via read only VIS) would further enhance the security of the Schengen area and facilitate the verification process at the border. The number of forged visas detected at the border should be close to zero when the digital visa is implemented. The achievement of these two specific objectives will be measurable.

In a time horizon of seven years[35] following the adoption of an initiative at EU level on digitalisation of visas procedures, all third country nationals should have the possibility to apply for a short-stay visa through digital means following the same, simple, modern and easy procedure independently on the Member State of destination. They should be able to access easily the same updated information and benefit from guidance to apply. The cost incurred by third country nationals to apply should be reduced to the minimum and they should not be obliged to travel for a repeat application or to collect their

[34] The digital visa has no physical features and can therefore, by its very nature, not be counterfeited. It is a digital record in the VIS, linked to the applicant, containing information about the validity and conditions of the visa issued.
[35] Seven years as from the adoption of the Commission proposal on digitalisation is the estimated timeline to reach a full level of digitalisation for all Member States.

travel documents. They should be less dependent on ESPs services for their applications. All third country nationals receiving a positive decision following their visa application would receive a digital visa. Member States should spend less resources on collecting visa applications and issuing short-stay visas and should be less dependent on ESPs to collect applications.

## 5. WHAT ARE THE AVAILABLE POLICY OPTIONS?

### 5.1. What is the baseline from which options are assessed?

Member States would continue to develop (or not) their own online tools for visa application, possibly with non-binding recommendations and support from the Commission (soft law measures), resulting in a fragmented landscape of portals/tools with different levels of digitalisation which could ultimately lead to increasing visa shopping by visa applicants. Member States would still have to manage supporting documents and physical stickers with associated costs (EUR 16.06 million per year for managing the visa sticker for all issuing Member States). Maintaining the status-quo would have no impact on EU institutions.

Third country nationals applying for a short-stay visa with little digital skills would continue to use the current paper-based process, incur travel (and potentially accommodation) costs to reach the consulate/VAC, as well as other travel/courier costs needed to collect the travel document with the visa sticker. Applicants would incur such costs because they would have to provide their travel document for the purpose of affixing the visa sticker. They would most likely still be obliged to sign the application form on paper. Third country nationals applying through a national digital application platform could benefit from its features, but it remains to be seen how many more Member States will digitalise their application process independently and to what extent.

Regarding impact on security, the lack of harmonisation across Member States in the way supporting documents are to be submitted, would imply that consulates would continue to work with documents of different quality and reliability. The use of paper visa stickers would entail security risks. Despite the recently adopted and more secure sticker format, visa stickers may still be subject to counterfeiting and not address identity fraud adequately.

The status-quo or baseline scenario analysed below could also potentially have long-term macro-economic impact on the Schengen area. If the status-quo continued until 2029, the current trend on digitalisation at global level offering potential travellers the possibility to apply online and obtain a digital visa would increase the cost of no action at EU level. The competitive disadvantage of the EU compared with other third-countries in attracting travellers might increase and the promotion of the EU as a travel destination would be hampered by this situation. Loss of income for EU companies, in particular in the travel and tourism industry, would materialise and third countries who would be perceived as more attractive for visa-required Third-country nationals would benefit from this situation.

Regarding data protection, no additional data or different data will be collected and processed in this baseline option than in the current situation in all Member States. Member States will have to comply with mandatory legislation (GDPR and relevant provisions of the Schengen acquis) while implementing their own procedures and systems. From this perspective, there will be no negative or positive impact on data protection. Under the baseline scenario, it can be assumed that Member States relying on external service providers for a number of services (e.g. appointment booking, checking and registering applications, collection of biometrics and in some cases scanning paper applications) will continue to follow their own procedures, ensuring that those third parties actually comply with data protection obligations. This does not pose a threat to data protection as long as a thorough evaluation of each ESP and its compliance with the data protection requirements are frequently carried out by Member States authorities.

As regards to other impacts, the present fragmentation in terms of national practices for managing the application process negatively affects the perception of the European Union as a single geographical entity applying a common visa policy.

From an environmental point of view, although the effects may be marginal, the travels of third country nationals to the consulates or VAC also have an impact on CO2 emissions. The continued use of paper applications, paper-based supporting documents (including those produced digitally and subsequently printed) and visa stickers has a certain albeit limited effect on paper consumption.

#### *5.1.1. Existing national application portals and features*

The current legal framework[36] has recently included the possibility for the digital submission and processing of visa applications (e.g. filling in and signing electronically the application), but most Member States only digitalised parts of the Schengen visa process. They may encourage online visa applications, but (a) they can only do so via national online application portals, managed individually, sometimes with the help of ESPs as there is no common EU online visa application platform; and (b) their systems rarely allow applicants to upload supporting documents in digital format and to electronically sign their application which means that the applicant still needs to print and sign the form manually[37] and submit the application on paper[38]. Member States will continue to develop their national tools in the coming years but these initiatives are likely to cover only parts of the application process especially if the current legislation on visa issuance is maintained, requiring the applicant to visit the consulate or VAC to provide his/her travel document for affixing the visa sticker. Member States might choose for the time being to keep the submission of supporting documents paper based as well. Some Member States will not develop digital application platform due to the low number of applications they deal with versus the investments needed. See Annex 2 for more details on the levels of digitalisation in the Member States.

[36] Mainly Regulation (EU) 810/2009 (the 'EU Visa Code'), Regulation (EU) 2019/1155 of 20 June 2019 amending Regulation (EU) No 810/2009 and Regulation (EU) 767/2008 (the 'VIS Regulation').
[37] No Member State has declared to recognise electronic signature at this stage. Four Member States allow applicants to tick a box in the portal to acknowledge the information is correct, but this does not equate to signing the application as per Article 11(1) of the Visa Code.
[38] Although the application process is still paper based from an applicant's point of view, Member States could benefit from implementing an online form if it eliminates the need for manually registering the application in their national systems.

#### *5.1.2. Digital visa*

Currently, a digital visa cannot be used by Member States as they are required by EU law to issue a paper visa sticker. Article 29 of the Visa Code provides that a valid visa shall be certified via a paper sticker affixed to the holder's travel document or on a separate sheet in case the travel document is not recognised by the Member State. The sticker includes a unique number that is also part of the corresponding record in the VIS, allowing the verification of the holder's identity by competent authorities. This requirement is common for all Member States. It is important to note in this regard that, while the security features of the visa stickers have been continuously increased since it was introduced, the security of the visa sticker could not be further improved through changes to the Visa Code. Security features of the visa sticker are specified and adopted in the Article 6 Committee established by the Visa Sticker regulation[39]. Additionally, the revised Visa Code did not address the security of the visa sticker, but the responsibility regarding rules on filling in and affixing visa stickers.

#### *5.1.3. Biometric enrolment*

Under the baseline scenario biometric enrolment needs to be done in person. The following biometric data of the applicant needs to be collected:

- a photograph, scanned or taken at the time of application (in the future: live capture will be required) and;
- 10 fingerprints taken flat and collected digitally.

Once the biometric identifiers are collected, they can be reused for any subsequent visa application within a period of 59 months.

#### *5.1.4. Travel to consulate and/or courier charges*

In the vast majority of cases, third country nationals have to lodge the application at a consulate or VAC and - in case of first-time travellers or expiry of biometrics (after 59 months) – have their biometrics collected. They also have to go to the consulate or VAC or pay courier costs (if the consulate or VAC arranges home delivery), to retrieve their travel document with a final decision (a visa sticker affixed in the passport or a refusal to issue a visa).

### 5.2. Description of the policy options

#### *5.2.1. General definition and policy changes*

The Impact assessment evaluates five policy options, option 1 being the baseline situation, with varying levels of EU intervention in the current visa process:

**Option 1 (O1): Baseline situation:** Please refer to section 5.1

[39] Council Regulation (EC) No 1683/95 of 29 May 1995 laying down a uniform format for visas (Official Journal L 164, 14/07/1995 p. 1-4 https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A01995R1683-20170817

**Option 2 (O2): Minimal EU legislative changes and digital visa (mandatory)**. It includes some minimal legislative changes at European level, aiming to remove legal obstacles that limit the possibility for Member States to further digitalise the visa application process. The introduction of a digital visa is also a crucial difference with Option 1 (the status quo). A mandatory digital visa would replace the paper visa sticker and a web service would be introduced to check its validity.

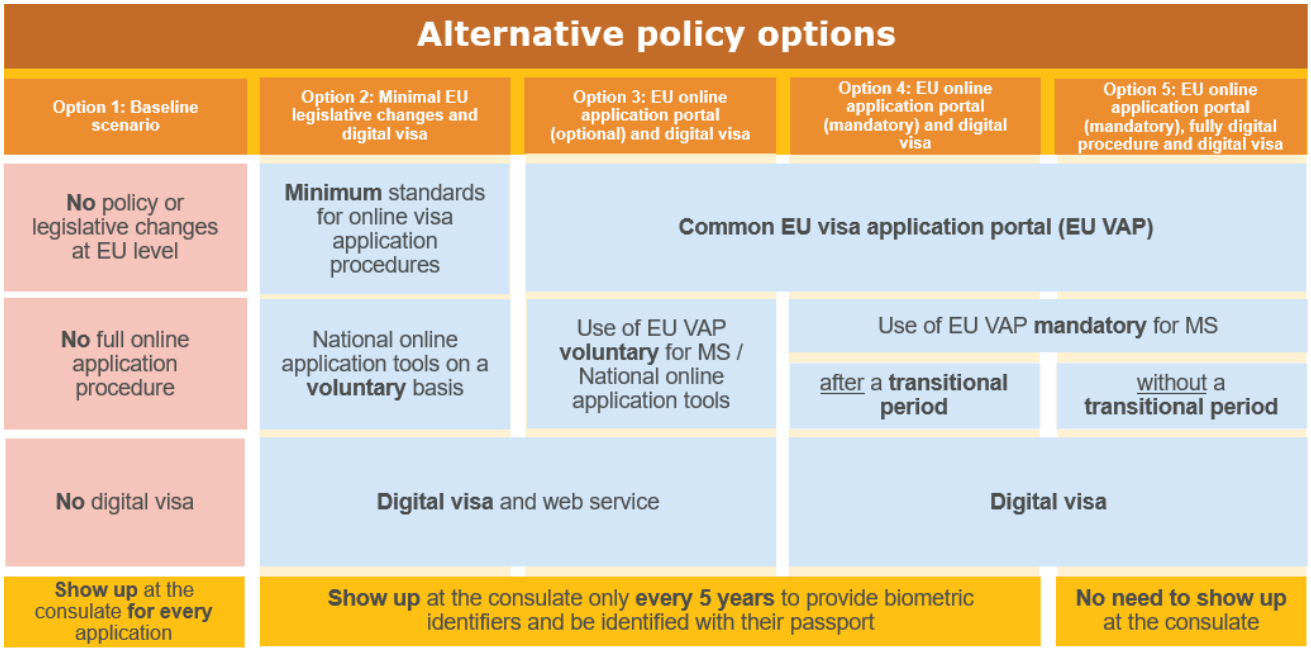
**Option 3 (O3): an EU visa application platform (optional) and the digital visa (mandatory). O3** envisages the development and building of an EU visa application platform, albeit only on an opt-in basis. Member States could choose to participate in the EU visa application platform on a voluntary basis or develop/continue to use their own national portals or to not develop any digital application solution. Visa holders would be able to check the validity of their digital visa through the EU visa application platform. During the consultation with Member States, 14 expressed preference for option 3.

**Option 4 (O4): the EU visa application platform (mandatory after a transition period) and the digital visa (mandatory). O4,** like **O3**, also includes the development of an EU visa application platform. Whereas participation of the Member States to the EU visa application platform would be optional under **O3**, under **O4** the EU platform would be mandatory for every Member State after a transitional period of e.g. five years which would begin after the two-year development period of the EU Visa application platform. The purpose of the transition period is to allow Member States to phase out smoothly and amortise their investments made in national platforms. The five-year time frame is considered sufficient to amortise the investment and prepare for the transition to the EU visa application platform. Visa holders would be able to check the validity of their digital visa through the EU visa application platform and would only be obliged to come to the consulate or VAC to provide their biometrics or when they change travel documents. During the transition period and if they apply to a Member State not using the EU Visa application platform, the applicant might be obliged to come physically even for a repeat application, depending on the procedure used by the Member State to which he/she applies. During the consultation with Member States, 10 expressed preference for option 4. In the stakeholder consultations, the travel and tourism industry unanimously supported option 4, highlighting it as the best option to facilitate the application procedure for visa applicants and increase the attractiveness of the EU as a travel destination.

**Option 5 (O5): The EU visa application platform (mandatory, for all Member States without transition period), fully digital procedure and the digital visa (mandatory). O5** also entails the development of an EU visa application platform with mandatory participation of the Member States, but without the transitional period envisaged under O4. In this option (full digitalisation), applicants are never obliged to come to the consulate or Visa Application centre as all application steps can be carried out online (including the provision of biometrics). The main goal of this policy option is to fully digitalise the application process. Unlike all other options, the applicant would be able to enrol his/her biometric data through a digital application, removing the need to visit the consulate/VAC in person which would still exist under all other options. Member States, the EDPS, data protection authorities, the Fundamental Rights Agency and Europol all expressed concerns regarding option 5, in particular

due to the remote collection of biometrics. The figure below gives an overview of main policy changes of each option.

**Figure 3**: Policy options




The following sections describe each option closely linking them to the drivers of the problems and the identified objectives.

Moreover, the Impact assessment will analyse the impact on the preferred policy option of the following technical sub-options:

- **Architecture of the EU visa application platform**, which may be: centralised (sub-option 1) or hybrid (sub-option 2).
- **Material scope of the initiative** with the inclusion of long-stay visas in the scope of the analysis.
- **The fall-back solution for the digital visa**

1. Architecture of the EU digital platform: centralised or hybrid

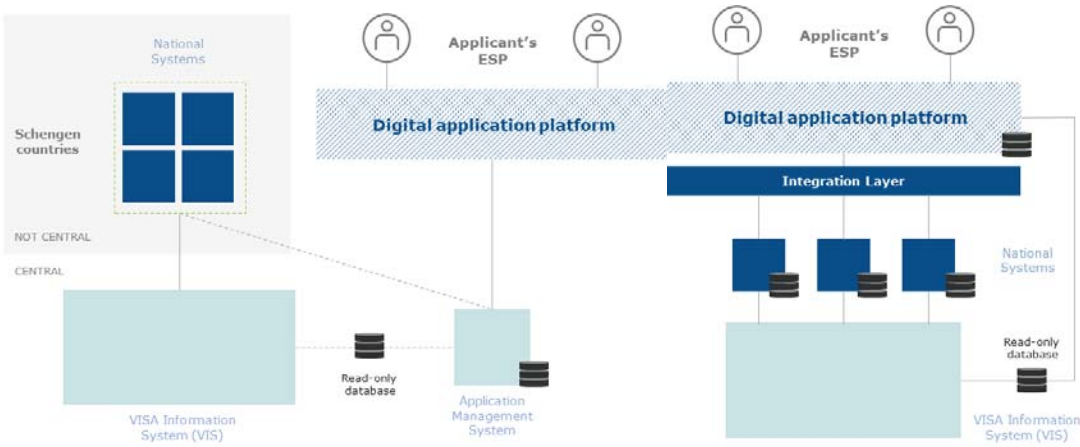
The architecture of the EU visa application platform defines what functional components are included, how they are connected, how data flows between them and where data are stored. The feasibility study[40] identified two different potential architectures (visualised below):

- **Sub-option 1 - A centralised architecture**: all application files are stored centrally, on the EU visa application platform; or

[40] Study on the feasibility and implications of options to digitalise visa processing, 2019, available: https://op.europa.eu/s/pgU6.

- **Sub-option 2 - A hybrid architecture**: all application files are stored centrally until they are admitted. At that point they are transferred to the relevant Member State.

**Figure 4**: High-level representation of the centralised (left) and hybrid (right) architecture sub-options




It is important to note that these architectures do not have an influence on what the EU visa application platform does. In other words, end-users – be they applicants, ESPs consulate staff or administrators – will not perceive the difference in architecture. The end-product remains a system allowing for the online visa application.

These two architectures differentiate themselves in where the application files are persistently stored. In the centralised architecture, all temporary and completed applications will be stored in the Application Management System from where Member States can access them. Access management controls would ensure authorities can only access those applications they should be able to access.

The hybrid architecture on the other hand only stores applications temporarily at central level. This includes partial applications, saved to be completed later and applications that are not yet marked as admissible, i.e. they still need to be checked by an authority for quality and completion. Once marked as admissible, the application is sent to the respective Member State and deleted from the temporary storage.

2. Material scope: only short-stay visas or short-stay & long-stay visas

This dimension entails assessing the costs and benefits of extending the two limbs of the initiative – the digital application platform and the digital visa – to long-stay visas. These visas allow the holder to stay on the issuing Member State's territory for a period longer than 90 days for different purposes (e.g. study, work, etc.). The sub-options are the following:

- **Sub-option 1** – This would limit the initiative to short-stay visas only;
- **Sub-option 2 –** This would extend the initiative to long-stay visas.

Extending the first limb – EU visa application platform – would mean that third country nationals would use the platform also to apply for long-stay visa to a Member State; extending the second limb – digital visa – would mean that the visa sticker for long-stay visas ("D" type) would be completely removed, and third country nationals would be issued digital long-stay visas.

As it is the case for the overall study, the choice of this sub-option only concerns the application process for long-stay visas and the format of these long-stay visas, and does not assess the feasibility or implications of amending the substantive requirements for issuing this type of visa, which in any case are mostly issued on the basis of national law.

3. Fall-back solution for digital visa: simple or digitally signed barcode

This dimension entails assessing the costs and benefits of two technical sub-options to complement the digital visa with a fall-back solution allowing for the verification of the visa offline. The sub-options are the following:

- **Sub-option 1 – Visa issuance notification:** The fall-back solution would consist of an electronic notification sent by the Member State issuing the visa to the visa holder informing the latter that the visa has been granted. It can be shown either on paper (print-out) or from a digital device.
- **Sub-option 2 – Visa issuance notification with digitally signed 2D barcode:** The fall-back solution would be the visa electronic issuance notification plus a 2D barcode containing the same data as the VIS record that has been encrypted with a digital seal by the Country Signing Certificate Authority (CSCA) of the issuing Member State. This sub-option would rely on the current Commission Implementing Decision[41] introducing a digitally signed 2D barcode in the current version of the visa sticker as of May 2022.

An analysis of the pros and cons of the different sub-options is provided in Section 8.2.

#### *5.2.2. The legal requirement for Member States to issue a paper visa sticker*

**O1** would not lead to the implementation of a digital visa and would not change the legal requirement for Member States to issue a visa sticker in case of a positive decision.

Under **O2, O3, O4 and O5** legislative changes would require Member States to issue a digital visa and to check an individual's visa at the border through their biometrics or with a fall-back solution. As a result, the internal security of the Schengen Area would improve as it would no longer be possible for third country nationals to try entering the Schengen area holding a falsified visa sticker. During the stakeholders consultations that were held in context of this impact assessment, Frontex indicated that the introduction of a digital visa would be welcome as it will make forging visa stickers even more difficult (no more "physical" visa). In addition, the high operating costs of the visa sticker would disappear.

[41] Commission implementing decision C(2020) 2672 final of 30.4.2020 introducing a digital seal on the uniform format for visas

### *5.2.3. Member State reliance on in-person/paper-based practices*

Under **O1**, it is very likely that the vast majority of applicants would still have to lodge their application at a consulate/VAC in person. Applicants would also have to go to a consulate/VAC, or pay courier costs if the consulate/VAC arranges home delivery, to get the passport with a final decision (a visa sticker affixed in the passport or a refusal to issue a visa). In addition, it would be mandatory to go to the consulate/VAC in person to provide the necessary biometrics with a first application or every 59 months.

Under **O2** and **O3**, the personal appearance at the consulate would depend on the extent to which Member States have digitalised the application process. However, it would still be mandatory in all cases to travel to the consulate/VAC to provide biometrics every five years and for identification in case the applicant will be travelling on a different travel document. Repeat applicants would no longer need to travel to collect their travel document as the digital visa would be implemented under these options. They would no longer need to travel if they apply for a visa to a Member State equipped with a national online application portal or through the EU visa application platform (in **O3** and **O4**).

Under **O4** the personal appearance at the consulate/VAC would be mandatory for first time applicants and applicants who have acquired a new travel document (or every five years thereafter) for the collection of biometric identifiers. Given that the EU visa application platform would be used by all Member States in a five-year period, repeat applicants could apply fully online, provided that they apply with the same travel document. Applicants would no longer need to travel to collect their visa as the digital visa would be implemented.

Under **O5** the personal appearance at the consulate/VAC would only be required for a very limited number of cases, e.g. when consulates want to check the authenticity of supporting documents. In all other cases, applicants would no longer need to visit the consulate/VAC to provide biometrics and/or be identified with the travel document, as part of the application process. They would be able to identify themselves and submit their biometrics fully online.

As regards collection of the biometrics[42], under **O2, O3** and **O4** there would be no changes compared to the status quo (**O1**) where physical presence of the applicant is required. Once the biometrics are collected, they can be reused for any subsequent visa application within a period of 59 months.

**O5** would include a fully digitalised procedure, including identification of the applicant and the enrolment of biometric data through a digital application, removing in principle the need to visit the consulate/VAC in person.

[42] The following biometric data of the applicant needs to be collected: a photograph, scanned or taken at the time of application, and his/her 10 fingerprints taken flat and collected digitally.

#### *5.2.4. Heterogeneous levels of digitalisation and fragmented visa procedures across Member States*

Under **O1** the development of digital tools depends on the initiative of Member States, without any support, framing or obligation from the EU which could result in the long run to improved digitalisation but in a very fragmented manner with different tools, features and processes. Even if the usage of national portals would be encouraged with non-binding standards under **O1,** and with mandatory minimal standards set up with legislative changes under **O2**, under these two options the potential development of a national visa portal by Member States would however remain fully optional. This would only partially address the problem and related effects (e.g. visa shopping). One of the consequences of these options is that applicants might have to set up an account (or other user credentials) for each Member State for which they want to apply for a visa. In policy option **O2**, applicants will be able to check the validity of obtained visas via a common web service, but the way they will be notified that a visa has been refused will vary from Member State to Member State.

Under **O3** national portals would continue to be developed and used on a voluntary basis, but some Member States might choose to use the EU platform. This diversity, however, does not address the problem of fragmentation and the complexity of the application process as they also occur in **O1** and **O2**. It would discourage third country nationals from applying and fragmentation would persist over time.

Under **O4,** a mandatory EU visa application platform with transitional period (e.g. 5 years) would be created and the national portals would be gradually phased out. Under **O5** (no transitional period) national platforms would no longer exist after the EU visa application platform becomes fully operational. These two options would address the main problems of fragmentation and complexity of the application procedure as they would offer the applicant a single environment to apply and to view his/her visas or refusals online, regardless of the Member State of destination. This would reduce the risk of visa shopping (due to automation in the EU application platform, applicants would not be able to decide to which consulate to address the application). It would also simplify the process for frequent travellers and would encourage them to apply.

#### *5.2.5. Suboptimal and fragmented guidance provided to applicants*

**O1** would not lead to the implementation of an EU visa application platform, but the common, however non-binding, standards set out by the EU would provide a first step in the standardisation and harmonisation of digital application process between the different Member States from both a legal and operational point of view. With **O2,** legal hindrances such as the obligation of signing the application form submitted electronically would be removed and would make the digitalisation of the visa application process more straightforward. However, under these two options the process would remain complex and guidance provided to applicants would stay fragmented across different Member States as it is the case now under the baseline scenario.

**O3** would require EU Regulation to introduce provisions concerning the EU visa application platform (as well as for **O4** and **O5**) and would involve the development and set-up of an EU platform, albeit

only on an opt-in basis, meaning that Member States could choose to use the EU platform, their own national portals or none. This means that each Member State would have to set up and maintain systems to inform the applicant about Schengen visas and the application procedures. The fact that this information would be found in different national portals and might vary across Member States, could confuse applicants, who might decide not to use portals and continue using in-person/paper-based practices, leading to still lengthy processes for consulates to manage, process and archive paper documents.

Under **O4** the EU visa application platform is mandatory, but with transitional period. Whereas in **O5**, there is no transitional period for the mandatory EU visa application platform. These two options introduce common practice as regards digital application, which would lead to removing the issues of fragmented guidance that would persist under other options.

### 5.3. Options discarded at an early stage

None of the options were discarded at an early stage because all options were considered to have a potential positive impact on the policy, compared to the baseline scenario. Furthermore, although the different options received varying degrees of support among stakeholders, none of the options were fully rejected.

## 6. WHAT ARE THE IMPACTS OF THE POLICY OPTIONS?

The impact of the different policy options was assessed across various categories, in line with the Better Regulation guidelines. As regards social impacts, the assessment focuses on implications for security and fundamental rights, as well as data protection. Detailed assessment on the quantitative impacts of the different policy options are available in the Study to assess the various options related to visa process digitalisation and to support the preparation of an impact assessment[43].

### 6.1. Economic impact

#### *6.1.1. Impact on EU institutions and agencies*

The economic impact of the digital visa for EU institutions and agencies are equivalent for **O2**, **O3**, **O4** and **O5**. However, for **O2**, a web service allowing third country nationals to check information on their digital visas would have to be built, whether Member States use their own national online application portal or maintain the paper process. The costs for the web service to be implemented at central level by the European Union Agency for the Operational Management of Large-Scale IT Systems in the Area of Freedom, Security and Justice (eu-LISA), which would reuse the concept of the web service to be built for EES and ETIAS, are estimated at EUR 3.5 – 6.4 million for one-off costs related to procurement, design, development, testing, infrastructure and deployment and EUR 3.5 – 6

[43] Study to assess the various options related to visa process digitalisation and to support the preparation of an impact assessment - Final Report, available; https://ec.europa.eu/home-affairs/study-assess-various-options-related-visa-process-digitalisation-and-support-preparation-impact_en

million yearly maintenance costs over the 2025-2029[44] period. The visas currently issued are already digitally stored in VIS. Therefore, digitalisation of visas would not imply any additional costs for the EU budget.

In addition to the costs linked to the dematerialised visa (or digital visa) that will concern options **O2**, **O3**, **O4** and **O5**, the **set-up of the EU visa application platform** envisaged by **O3**, **O4** and **O5** would trigger costs for establishing the central digital application capability. As estimated in the EU visa application platform prototype study[45], the one-off cost to enable this capability would range between EUR 33.8 million and EUR 41.2 million for eu-LISA[46] (including the managed service costs and the adaptations needed for VIS). In addition to the one-off technical costs, eu-LISA is expected to need to expect 8 additional full-time equivalents for supporting the development efforts during 2024 and 2025. This amounts to an additional costs of EUR 2.5 million across these two years[47]. Once this managed service is created, it also needs to be operated and maintained, leading to a yearly cost between EUR 10.5 million and EUR 12.8 million for eu-LISA[48]. Additionally, this would involve establishing a design/business team, service level agreements and extensive stakeholder management, as well as additional staff (7-10) and training costs (EUR 20 000 – 33 000) for eu-LISA.

#### *6.1.2. Impact on Member States*

As regards the **impact on Member States, O2, O3, O4 and O5** would allow savings on the costs attached to the current visa stickers, which would no longer be required (EUR 76.6 million over 2025-2029). The introduction of the digital visa would trigger only negligible costs for Member States that have not been taken into account in this impact assessment. Indeed, the tools to generate and verify a signed 2D barcode will already be in place to comply with the Commission's Implementing Decision C(2020)2672 of 30.4.2020 introducing a digital seal on the uniform format for visas[49].

In addition, the implementation of an EU visa application platform (**O3, O4, O5**) is expected to reduce the administrative burden on consulates both in terms of time spent processing paper-based applications and time spent printing and affixing the visa sticker[50] with total savings under **O3** amounting to EUR 364.3 million for all Member States on the 2025-2029 period, EUR 510.9 million under **O4** (taking into account small additional costs to capture biometrics) and EUR 521.6 million

[44] Study to assess the various options related to visa process digitalisation and to support the preparation of an impact assessment - Final Report, available: https://ec.europa.eu/home-affairs/study-assess-various-options-related-visa-process-digitalisation-and-support-preparation-impact_en

[45] A project with eu-LISA to develop and test a prototype of a future EU online visa application platform launched in September 2020 in accordance with a Service Level Agreement signed between DG HOME and eu-LISA on 27 July 2020. The project is to analyse the costs as well as technical and legal requirements of a future EU online application platform. The final report of the project to be submitted by October 2021.

[46] Please note these are the cost estimations for O4. O3 and O5 have a slightly different cost estimation. Please refer to Table 4: Comparison of costs and benefits for the details.

[47] Estimated directly by eu-LISA and DG HOME.

[48] Like before, presented costs based on O4. O3 and O5 have different cost estimations. Please refer to Table 4: Comparison of costs and benefits for the details.

[49] This Implementing Decision stipulates that all Member States shall apply the digital seal at the latest two years after the notification (i.e. 1 May 2022).

[50] Study to assess the various options related to visa process digitalisation and to support the preparation of an impact assessment - Final Report https://ec.europa.eu/home-affairs/study-assess-various-options-related-visa-process-digitalisation-and-support-preparation-impact_en – result of comparison of options.

under **O5**. Another benefit of the EU visa application platform is that all general information on Schengen visas will be kept up to date at central level, including a guidance tool that enables third country nationals to check if a visa is needed and under which conditions. All this will trigger savings for Member States up to 576 FTEs[51] (2025 – 2029) to reply to queries from visa applicants. To implement the new EU visa application platform, each Member State using the EU platform (even the ones who already have some form of online portal) needs to adapt and connect its national systems with the centrally hosted and managed platform.[52] According to the EU visa application platform prototype study, this investment would roughly amount to EUR 2.8 million to EUR 3.3 million (on average) per Member State[53]. Once the national systems have been updated and connected to the managed service and sufficient storage space is provided for, these new enhanced national systems will need to be maintained, with an estimated cost between EUR 460 000 and EUR 570 000 per Member State, annually[54]. These expected costs, however, vary with the number of applications a Member State receives. It should be noted that Member States choosing their own solution for digitalising visa applications (in policy options **O1**, **O2**, **O3**) must also have systems in place to store these digital files.

**O5** also includes additional time saving as biometric data would no longer be collected in person at the consulate or at VAC.

The benefits relating to the reduction of administrative burden for Member States, even if they also rely on a number of forecast visa issued, are more reliable because they have been calculated on the basis of an existing workload/tasks and costs that currently exist, and have been estimated with Member States input. These costs will partially or completely disappear with digitalisation, which is why even assuming a stable number of travellers over the 2025-2029, the calculations would still show a significant reduction of the Member States administrative burden and associated costs.

#### *6.1.3. Impact on third country nationals*

Third country nationals currently (**O1**) incur travel costs and sometimes accommodation costs to apply for a visa as they have to leave their travel document at the consulate, as well as costs to collect their travel documents after the application process is completed.

Minimal improvements are expected under **O2**, where the costs for repeat applicants would reduce as they would no longer have to travel to the consulate or VAC to lodge their application. This would apply if Member State who run their own portals would allow applicants to submit supporting documents online. The same benefit for third country nationals would apply for options **O3** and **O4** as

[51] Study to assess the various options related to visa process digitalisation and to support the preparation of an impact assessment - Final Report https://ec.europa.eu/home-affairs/study-assess-various-options-related-visa-process-digitalisation-and-support-preparation-impact_en.

[52] In the case of O3, where it is estimated that 16 out of 25 Member States would opt in, the assessment of impacts, costs and benefits only applies to Member States that decide to opt in. For those that do not, the impacts are equivalent to O1.

[53] This average cost deviates from the one presented in Option 3. This is because the 16 Member States that were selected in policy Option 3 account only for 43% of the visa applications while accounting for roughly 64% of all Member States. This is the reason why infrastructure costs cannot be scaled linearly based on the number of Member States that decide to opt in.

[54] Like before, presented costs based on O4. O3 and O5 have different cost estimations. Please refer to Table 4: Comparison of costs and benefits for the details.

the third country nationals would not need to pick up their travel documents and could lodge their application online[55]. This measure would entail a cumulated saving of up to EUR 2.7 billion[56] under **O2**, 2.7 billion under **O3** and 2.9 billion under **O4** in terms of direct travel costs for third country nationals during the application process for over the 2025 - 2029 period[57], as well as the associated opportunity costs that comes with travelling to the consulate or VAC. Besides cost savings, 89% of the respondents in the public consultation indicated that not going to the consulate or VAC as a repeat applicant is important for them. However, costs and obstacles for first-time applicants would remain. Under **O4**, third country nationals will be able to use a single application platform whatever their Member State of destination, using one single procedure and being able to save and reuse their data for a subsequent application. In addition, a single online application platform would provide in one single place information on Member States application procedures. This information will be more easily updated and maintained, significantly increasing the quality and reliability of information provided to third country nationals. Although difficult to quantify, this option would spare time and produce greater benefits for third country nationals than in **O3** where they would still have to cope with several application procedures.

In **O5**, the benefits of the fully digitalised application would be even greater for third country nationals and would allow savings up to EUR 8.3 billion over the same 2025-2029 period.

For visa applicants, digitalisation will decrease the travel costs associated to visa applications because they will not have to travel or pay a courier to pick up their passport with the visa sticker and repeat applicants will be able to apply fully online during five years after their first application. Even with a stable number of travellers, these benefits would remain substantial.

It must be stressed that all options would have no impact on the visa fee itself.

## 6.2. Social impact

### *6.2.1. Security*

Under **O2**, Member States would continue to have different degrees of **digitalisation of their visa procedures**. Depending on which documents are requested on paper and which ones can be submitted online and/or digitally, consulates of different Member States may process documents of varying quality and reliability which would not allow improving the detection of forged documents.

The major novelty of **O5** is the possibility for first-time applicants or third country nationals to enrol biometrics independently by using a digital app on their smartphones to capture their facial image and fingerprints. **O5** would decrease costs and increase time savings compared to **O3** and **O4**; however, it

[55] Out of the EUR 74 of travel cost per applicant calculated in the baseline scenario, EUR 17 are linked to picking up the travel document with the visa sticker affixed and EUR 57 linked to the application itself. 25% of the applicants (repeat applicants) will therefore no longer have to incur the EUR 57 cost, which explains that the savings are only 40% of the total travel cost. A sentence explaining this will be included in the report.
[56] This figure takes into account the fact that 3% of applicants will still apply at the consulate because of impossibility to apply online or because they will be required to provide original supporting documents to verify their authenticity, slightly lowering benefits expected.
[57] Assuming a 75/25 split between first time applicants and third country nationals applying within 59 months after their biometrics were enrolled. It should be noted that some third country nationals will be able to lodge their entire application online, but could still need to travel in order to submit a number of supporting documents. Nonetheless, for the 75/25 split is maintained in order to calculate the costs.

also increases security risks. First, because the identification of the applicant is not done in a controlled environment (risk of identity fraud), and second because adequate quality of biometrics is not guaranteed, which could cause mismatches with data stored in EU information systems. As biometrics only have to be submitted every 59 months, identify fraud might go undetected for the same period of time. Even though there are secure technologies available to provide biometrics, a first identification is always done by checking it against an official identity document. Persons whose identity have been established, could then be allowed to identify themselves online with the biometric identifiers and secure technologies. By enrolling biometrics using a digital app, there is no check if an applicant commits identity fraud using a forged travel document in combination with their own biometrics. **O5** is therefore likely to disrupt the reliability and security of Schengen visa applications. Under options implying the use of the EU Visa application platform, the choice of the hybrid or decentralised sub-option for the storage of data would avoid the risk of having a single point of failure and attacks.

As regards the security implications of maintaining the **visa sticker vs introducing a digital visa**, evidence indicates that the paper visa sticker is not threat and risk-proof as it is prone to falsification and fraud.[58] However, biometric checks against the VIS at the border should make entering and staying in the Schengen area with a forged sticker more difficult or rather impossible. The current Schengen Borders Code requires a biometric verification at the Schengen external border that the traveller corresponds with the person who applied for the visa (and whose biometrics are stored in VIS). With the entry into operation of the Entry-Exit System, biometric verifications will even become more routine as they will also apply to any third country national entering the Schengen area for a short stay and not falling in the exception cases. **O4** will however achieve deeper harmonisation than the previous options because all applicants will upload their documents through the EU online application platform which will enforce certain formats and data quality. A digital visa embedding these security features will be significantly less prone to forgery. This will further reinforce the visa format security.

Maintaining the visa sticker **(O1)** would not hamper the security benefits of EES and interoperability but may lead to inefficiencies: border guards would still be required to verify the sticker, and if check with VIS contradicts the data on the sticker, they would spend additional time investigating the mismatch and ascertaining that the sticker has been counterfeited.

The replacement of the visa sticker with the digital visa (**O2**, **O3**, **O4**, **O5**) would lower security risks related to counterfeited and stolen stickers, especially those not detected by border and/or police authorities. Furthermore, carriers will be better equipped to check if third country nationals hold a valid visa thereby mitigating the risk that they transport people with fraudulent visas to the Schengen area and alleviating the burden of checks at the Schengen borders.

#### *1.2.1. Protection of personal data*

In general, as pointed out by the EDPS and national Data protection authorities, the higher degree of digitalisation of the options, the greater are the risks to data protection. That is why the principles of

[58] Interviews with border authorities of Member States. Despite the security features that make the sticker a reliable source of verification, cases of fraud could still occur as they do nowadays. Hundreds of cases of counterfeiting are detected per year according to Frontex despite the new sticker format.

"purpose limitation" and "data minimisation" will have to be strictly respected in the context of the new developments triggered by digitalisation.

As also pointed out by EDPS, data protection impacts of digitalisation would primarily stem from the introduction of a visa application portal (with impact on handling of personal data by external service providers, data security of the portal, collection of biometrics through digital means under O5 etc.).

Under **O2** mandatory standards may enhance monitoring of compliance and legal certainty, positively contributing to data subjects' trust in the data processing. The web service would entail data security implications that need to be mitigated via a "privacy enhancing" implementation.

Under **O3** the EU visa application platform would introduce uniform data processing practices, which would however apply only to a subset of Member States.

Under **O4** the EU platform would introduce uniform data processing practices, which would apply to all Member States. It would reduce exposure of personal data to ESPs as repeat travellers would be able to apply directly through the EU application portal.

Under **O5** the EU visa application platform would introduce uniform data processing practices, which would apply to all Member States and would even more reduce reliance to ESPs compared to **O4** as first time and repeat applicants would be able to apply online. Nevertheless, under **O5**, the online biometric enrolment would open up new privacy challenges compared to the other options, such as collection of (new) or additional data on mobile application and exposure of data to other (third) parties.

Under **O3, O4** and **O5**, the use of ESPs does not pose a threat to data protection as long as processes and technologies used by ESPs comply with data protection and privacy enhancing principles and that proper monitoring of each ESP is carried out by Member States authorities. EU law already provides that ESPs need to respect GDPR and applicable data protection safeguards, which also applies to methods of identification of applicants by ESPs when collecting their biometrics[59]. In addition, the use of a single application platform could lead to a reinforced compliance of data protection practices by ESPs (same standards/rules applying to all ESPs). A "privacy enhancing" implementation will safeguard security of data stored in the EU visa application platform.

Nevertheless **O5** presents serious risks regarding data protection due to the self-enrolment of biometrics through digital means. All other options (O2, O3 and O4) are relatively equivalent as far as data protection was concerned.

In terms of the **data protection implication of digital visas,** currently the information about a visa is stored in a large-scale EU database – VIS, as well as evidenced by affixing a visa sticker in the passport. Hence, dematerialising the visa sticker into a purely digital visa does not change the fact that the visa information is (and will still be) stored in a large-scale EU database. Since storage in a centralised

[59] In accordance with Annex X of the Visa Code listing the minimum requirements when Member States cooperate with ESP, as last amended in the 2019 revision of Visa code.

large-scale EU database has undeniable data protection impacts, the VIS regulation already contains high data protection safeguards (retention rules, access rules, access rights, rights to rectification, completion, erasure of personal data and restriction of processing etc.). Moreover, the recently revised VIS Regulation has further enhanced these data protection safeguards. These enhanced data protection safeguards will continue to apply, as the purely digital visas will continue to be stored in VIS. Additionally, the ETIAS Regulation, which introduces digital travel authorisations for visa-free travellers, is currently being implemented. This Regulation contains data protection standards for notifications to travellers regarding their travel authorisations. Notifications to travellers regarding digital visas will follow the same standards for communicating with travellers regarding their visas.

#### *6.2.3. Protection of fundamental rights*

In terms of implications for the **protection of fundamental rights,** under **O1** there would be no impact on the protection of fundamental rights compared to the present situation. Under **O2** and even more so **O3, O4** and **O5,** people with low IT literacy and people who cannot read or write applying from distance may need technical assistance to use online application tools, but the assistance provided by family members and friends, service providers and consulates would be sufficient to guarantee protection and inclusion, according to the results of the consultation with Member States. Service providers already provide assistance and services to support applicants today for paper-based and online applications. Repeat applicants with reduced mobility would be able to apply with no need to visit a consulate/VAC. Therefore, **O1 O2, O3** and **O4** would ensure compliance with the EU Charter of Fundamental Rights with **O4** providing the same supporting features to people unable to see or hear in all Member States.

**O5** would comply with the protection of fundamental rights. Nevertheless, under **O5** consulates and VAC staff would normally have little to no chance to perform on-site checks to detect child abduction or trafficking of human beings. In particular children above the age of 6 will not be required to come to the consulate/ VAC to enrol their biometrics. Even if the visa procedure plays a very limited role in detecting child abduction and trafficking of human being, **O5** might offer less possibilities than other options to detect such cases.

### 6.3. Environmental impact

Under the **O1 scenario,** the main environmental impacts concern the continued use of (non-) renewable resources due to paper-based administration (applications and visa stickers) and the travel of applicants to the consulates. The environmental impacts of these elements are expected to increase under the baseline scenario in line with the projected increase of visa applications and issuance. Additionally, the vast majority of the applicants will have to travel to the consulate or VAC on average 129.76 km[60] in order to lodge their application and/or collect their travel document. This would produce up to 477 million kg of CO2 for both activities combined in 2029[61] (i.e. 2.9 billion kg over the 2025-2029 period).

[60] This average includes the third country nationals which did not have to travel, or a distance of 0 km.
[61] Study to assess the various options related to visa process digitalisation and to support the preparation of an impact assessment - Final Report, available: https://ec.europa.eu/home-affairs/study-assess-various-options-related-visa-process-digitalisation-and-support-preparation-impact_en.

As **O2** entails the introduction of common standards related to developing national visa application platforms, as well as the removal of certain boundaries such as the necessity to sign the application document in person, **O2** would enable saving 38% of the CO2 emitted by third country nationals travelling to consulates/VACs, 50% of the paper needed for visa applications, and all paper used for visa stickers. **Under O3**, **O4** and **O5,** thanks to the digital visa and the gradual reduction of travels by visa applicants to pick up their travel document or to apply (in particular for repeat applicants using the EU Visa application platform), the emissions of CO2 linked to the application process would decrease. O5 would almost save the remaining 75% of CO2 emissions and paper in the application process). Regardless of the number of travellers, paper consumption as well as travel of third country nationals for the purpose of applying for a visa will decrease, with positive impacts on the environment.

Overall, the positive impact of all options on environment (reduction of travels for repeat applicants, paper consumption) are certain, regardless of the number of travellers whereas additional CO2 emissions triggered by additional travellers are difficult to forecast. According to the calculations carried out in the context of this impact assessment, the slight increase in tourism to the EU due to the implementation of the EU visa digital application platform for the period 2025-2029 would trigger additional emissions of up to 0.8 billion kg CO2 under **O3**, to 2.9 billion kg of CO2 under **O4** and up to 6.2 billion under **O5**[62]**.** Nevertheless the estimated increase of CO2 emissions might be overestimated, as it relies on an additional number of travellers triggered by the simplification and harmonisation of the application procedure that is difficult to predict. Furthermore the impact on the environment of these additional travels might be mitigated by carbon emission reduction measures for air transport. Recent initiatives aiming to reduce problematic fuel emissions in the air transport sector have not been taken into account in the calculation of the impact as it was not possible to produce reliable quantitative estimations. Because of this reason, the precise amount of extra CO2 indicated in the report is likely to overestimate the eventual impact. At this stage it is also not possible to assess whether travel habits and public-private initiatives will reduce the environmental footprint of the additional visa required third country nationals travelling in the coming years.

### 6.4. Impact on EU tourism and GDP

Given the difficulty to forecast ex-ante a) the "natural" growth of visa-required travellers and b) the impact of the introduction of a single EU visa application platform (precise quantitative correlation) on the number of travellers, the impact on tourism and GDP should be considered carefully in the context of this impact assessment as it is based on assumptions.

As regards **economic impacts on EU tourism and GDP, O1** and **O2** are not expected to bring about significant benefits to international travel and consequently to EU GDP. Under the options including an EU visa application platform (**O3**, **O4**, **O5**), it has been assumed that the introduction of the EU visa application platform would have a slight positive impact on the contribution of visa-required third country nationals to the EU GDP due to the increase of visa required third country nationals travelling

[62] Study to assess the various options related to visa process digitalisation and to support the preparation of an impact assessment - Final Report, available: https://ec.europa.eu/home-affairs/study-assess-various-options-related-visa-process-digitalisation-and-support-preparation-impact_en.

to the EU (2% under O3 and O4; 4% under O5), with the assumption that **O5** would generate the highest increase in travel. These assumptions rely on the results of the public consultation and of the survey with Member States and the travel industry that corroborated this expectation[63]: 86% of the respondents to the public consultation think that higher digitalisation would encourage more third country nationals to apply and travel; 11 Member States also mentioned that travel to the Schengen Area would benefit from a higher degree of digitalisation.

Whereas **O3** would already achieve significant progress towards the digitalisation of the visa procedure, **O4** would really mark the transition from a largely paper-based application process to a truly digital and largely harmonised process, which might help attract more visa-required travellers to the EU and therefore generating a potential higher contribution to the EU GDP, with a potential higher impact on the EU GDP under **O5**. The Schengen Area would thus benefit from a more coherent image vis-à-vis third countries as the traveller vetting processes would conform to the worldwide state of the art: along with ETIAS, the Schengen visa process would be a) relying on advanced digital technologies allowing for fast, secure and seamless interactions; b) applied consistently by all Member States; and c) based on a virtual and secure proof of clearance (digital visa).

## 7. HOW DO THE OPTIONS COMPARE?

To determine the preferred option, the policy options have been assessed and compared in the light of the following criteria:

- Effectiveness, i.e. to what extent the option meets the policy objectives;
- Efficiency, i.e. the relative weight of the costs and benefits of the option;
- Other impacts:
  - Level of protection of personal data;
  - Coherence with the Charter of Fundamental Rights of the EU;

The table below provides an overview of the result of the options comparison for all criteria. Detailed results on the comparison of policy options are provided in the 'Study to assess the various options related to visa process digitalisation and to support the preparation of an impact assessment - Final Report'[64].

***Table 3**: Comparison of options for all criteria*

| Criteria | Option 1 | Option 2 | Option 3 | Option 4 | Option 5 |
|---|---|---|---|---|---|
| To streamline and make more efficient the visa application procedure for applicants and MS through digital means (SO1) | 0 | 1.25 | 2 | 2.6 | 2.8 |

[63] A 2018 survey by the European Tourism Association estimated that the combined effect of the current Schengen visa process and the attractiveness of existing digital visa processes worldwide led 25% of Indian travellers dropping their application for a Schengen visa before submission.
[64] Study to assess the various options related to visa process digitalisation and to support the preparation of an impact assessment - Final Report, available: https://ec.europa.eu/home-affairs/study-assess-various-options-related-visa-process-digitalisation-and-support-preparation-impact_en

| Criteria | Option 1 | Option 2 | Option 3 | Option 4 | Option 5 |
|---|---|---|---|---|---|
| To increase the security of the Schengen area through the digitalisation of the visa sticker and digitalised application procedures (SO2) | 0 | 1.75 | 2.0 | 2.5 | -0.5 |
| Impact on the environment | 0 | 0.25 | 0.75 | 0.5 | 0.25 |
| **Overall effectiveness** | **0** | **1.1** | **1.6** | **1.9** | **0.8** |
| EU-level & Member States | 0 | 1.5 | 1.7 | 2.5 | 1.5 |
| Third country nationals | 0 | 1.5 | 1.5 | 2 | 2.5 |
| **Overall efficiency** | **0** | **1.5** | **1.6** | **2.25** | **2** |
| Protection of personal data | 0 | 0.5 | 0.75 | 1 | -0.5 |
| Coherence with Charter of Fundamental Rights | 0 | 0 | 0 | 0 | -0.5 |

### 7.1. Effectiveness

Each specific objective under effectiveness was scored from -3 to +3 (-3 indicating the most negative impact, +3 indicating the most positive impact) based on the assessment of the options. The impact on environment was also taken into account in the assessment of the effectiveness. The overall mark for effectiveness was then calculated based on the average of the three sub-criteria.

In the assessment of effectiveness, all options are assessed across the sub-criterions in comparison with the baseline scenario (policy option 1). In line with the Better Regulation Guidelines,[65] **O1** is considered as the benchmark against which all other options are assessed and scored. Therefore, the value of 0/nil is attributed to the baseline situation for all effectiveness criteria, whereby "0" means no impact compared to the baseline. A positive figure indicates an improvement of the situation in relation to the criterion assessed and a negative one a deterioration of the situation created by the implementation of the option. The marks reflect the assessment of the performance of each option in relation to each criterion. A high gap between two options (i.e. over 0.5 point) reflect substantial differences whereas lower gaps will reflect small discrepancies in the assessment of their performance relating to the criterion.

***Analysis of results***

- *To streamline and make more efficient the visa application procedure for applicants and MS through digital means (SO1)*

**O1** would contribute only to a very limited extent to these objectives, while **O2** would strengthen their achievement by a) making the EU-standards mandatory and b) enabling efficiency gains thanks to the digital visa. **O3** to **O5** would increasingly simplify and harmonise the process: **O3** would do so for repeat applicants in the 17 Member States expected to join the EU visa application platform[66]. With a mandatory EU visa application platform for all Member States, **O4** would simplify and harmonise the process in all Member States; and **O5** would extend the benefits of **O4** to all visa applicants (first time and repeat applicants).

[65] https://ec.europa.eu/info/law/law-making-process/planning-and-proposing-law/better-regulation-why-and-how/better-regulation-guidelines-and-toolbox_en. See in particular: Sections 2.4 and 2.5.
[66] See Annex 2.

- *To increase the security of the Schengen area through the digitalisation of the visa sticker and digitalised application procedures (SO2)*

**O1** would not contribute to these objectives. **O2** to **O5** would contribute to the same degree as far as the digital visa is concerned; in addition, **O3** and **O4** would allow Member States to strengthen examination by re-allocating FTEs saved in the administrative process if they choose to do so (with larger effects under **O4**); while **O5** would undermine security by preventing proper correct on-site identification of first-time applicants and repeat applicants using a different travel document. **O4** would fully harmonise format and data quality of supporting documents with the use of a single application tool, guaranteeing the same level of authenticity of documents submitted for all applications which would not be the case under **O3** as Member States would not be obliged to digitalise their application process. The choice of a hybrid architecture for the EU visa application platform under O4 would also ensure that the storage of applications in national database would avoid the risk of a single point of failure and attack that could jeopardise all stored applications.

- *Environmental impact*

O2 would enable saving 38% of the CO2 emitted by third country nationals travelling to consulates/VACs, 50% of the paper needed for visa applications, and all paper used for visa stickers. These savings would also materialise under O3 to O5 (and O5 would save an additional 17% of CO2 emissions in the application process). Regarding the additional emission of CO2 triggered by the increase in travellers, the same considerations as for the impact on GDP apply, as they rely on an additional number of travellers which is difficult to estimate whereas the impact on travels of repeat applicants would materialise for all repeat applicants, whatever the number of visas issued. As the options would gradually result in a slightly increasing number of travellers, the effect in terms of CO2 emissions would also increase even if they might be mitigated by the reduction of fuel emissions in the air transport[67].

With the implementation of the digital visa and of a mandatory single EU visa application platform, **O4** would be the option that would endure the highest effectiveness in fulfilling the key objectives of the digitalisation of the visa procedures.

### 7.2. Efficiency

The efficiency (effectiveness in relation to the cost) was scored from -3 to +3 (-3 indicating the most negative impact, +3 indicating the most positive impact) based on the assessment of the options.

On the basis of the result of the calculation presented in the table below, a separate score has been assigned to: a) the economic impact at EU-level and Member States; b) the economic impact on third country nationals. The overall efficiency score corresponds to the average of both scores.

The table below summarises the different costs and benefits compared with the baseline-option 1 with a quantification for each category of impact (additional cost or benefit compared with the baseline)[68].

[67] For full details on the calculations of impacts on the environment, please refer to the cost benefit analysis, Annex 2.
[68] For a detailed overview of the methodology and calculations of these costs refer to the supporting study, Annex 4.

The calculations have been made with a very slight increase of travellers (due to a "natural" increase of travels not linked to digitalisation). The baseline (16.9 million visas applied for in 2023, corresponding to 2019 pre-COVID level) would increase to 17.3 in 2024 and would stabilise to 17.8 million as from 2025). Beyond this "natural" growth of travellers, an additional increasing factor has been included to reflect a very slight increase of travellers linked to the use of the EU visa application platform (due to a simplified/easier application process) with + 5 % under O3 and O4 (with larger effects under O4 as all Member States would use the platform) and + 7% under O5.

Given the difficulty to forecast ex-ante *a)* the "natural" growth of visa-required travellers and *b)* the impact of the introduction of a single EU visa application platform (precise quantitative correlation), an assessment of the costs and benefits has been carried out with a stable figure (16.9 million applied for in 2025-2029) in the sensitivity analysis (Annex X).

***Table 4**: Comparison of costs and benefits*[69]

| **Economic impact** | **Comparison of each option against baseline (Option 1)** | | | | |
|---|---|---|---|---|---|
| | **Option 1** | **Option 2** | **Option 3** | **Option 4** | **Option 5** |
| **GDP contribution** ***(over 2025-2029)*** | *EUR 392.3 billion* | **Benefit:** 0 | **Benefit:** EUR 8.7 billion | **Benefit:** EUR 19.1 billion | **Benefit:** EUR 38.9 billion |
| **EU level** | No impact | **Costs** EUR 3.5 – 6.4 million spent on technical costs (one-off)<br><br>EUR 3.5 – 6.0 million spent on technical costs (2025- 2029) | **Costs** EUR 25.7 – 31.3 million spent on technical costs (one-off)<br><br>EUR 44.5 – 54,4 million spent on technical costs (2025 – 2029)<br><br>EUR 2.5 million staff costs for eu-LISA to support development | **Costs** EUR 33.8 – 41.2 million spent on technical costs (one-off)<br><br>EUR 52.5 – 63.9 million spent on technical costs (2025 – 2029)<br><br>EUR 2.5 million staff costs for eu-LISA to support development | **Costs** EUR 34.0 – 41.5 million spent on technical costs (per year)<br><br>EUR 52.5 – 64.4 million spent on technical costs (2025 – 2029)<br><br>EUR 2.5 million staff costs for eu-LISA to support development |
| **Member States** ***(aggregate numbers – all Member States)*** | *EUR 638.5 million spent on admin burden (2025-2029)*<br><br>*12 699 FTEs needed (2025-2029)* | | **Costs** EUR 30.9 – 37.7 million spent on technical costs (one-off)<br><br>EUR 27.5 – 33.5 million spent on technical costs (2025 – 2029) | **Costs** EUR 68.3 – 83.5 million spent on technical costs (one-off)<br><br>EUR 58.0 million – 70.5 million spent on technical costs (2025 - 2029) | **Costs** EUR 68.3 – 83.5 million spent on technical costs (one-off)<br><br>EUR 58.0 million – 70.5 million spent on technical costs (2025 - 2029) |

[69] Due to rounding, some totals may not correspond exactly with the sum of the separate figures.

| Economic impact | Comparison of each option against baseline (Option 1) | | | | |
|---|---|---|---|---|---|
| | Option 1 | Option 2 | Option 3 | Option 4 | Option 5 |
| | | **Benefits**<br>EUR 257 million saved on admin burden & real estate (2025-2029)<br><br>4 014 FTEs saved (2025-2029) | **Benefits**<br>EUR 364.3 million saved on admin burden & real estate (2025-2029)<br><br>6 417 FTEs saved (2025-2029) | **Benefits**<br>EUR 510.9 million saved on admin burden & real estate (2025-2029)<br><br>9 685 FTEs Saved (2025-2029) | **Benefits**<br>EUR 521.6 million saved on admin burden & real estate (2025-2029)<br><br>9 936 FTEs saved (2025-2029) |
| **Third country nationals *(aggregate numbers – all third country nationals over 2025-2029)*** | *EUR 74 per applicant spent*<br>*EUR 7.4 billion total spent for all applicants* | **Benefits**<br>EUR 31 per applicant saved<br>EUR 2.7 billion saved | **Benefits**<br>EUR 31 per applicant saved<br>EUR 2.7 billion saved [70] | **Benefits**<br>EUR 31 per applicant saved<br>EUR 2.9 billion saved | **Benefits**<br>EUR 72 per applicant saved<br>EUR 6.9 billion saved |

**The impact on GDP,** as mentioned above, would very much depend on the "natural" growth of travellers and the impact of the simplification of procedures on the choice of travel destinations for visa-required tourists. The additional contribution to GDP figures must be carefully interpreted in the light of these considerations as they rely on assumptions. On the basis of World Bank data relating to the impact of tourism on GDP,[71] option 3 would lead to 1.1 million extra travellers over the 2025-2029 period and to EUR 8.7 billion extra benefits; option 4 would lead to 3.9 million extra travellers over the 2025-2029 period and to EUR 19.1 billion extra benefits; and option 5 would lead to 8.4 million extra-travellers over the 2025-2029 period and to EUR 38.9 billion extra benefits.

**For EU institutions and agencies**, **O2** would entail limited one-off costs at EU level to develop the web service to allow applicants having applied through national portals to check the validity of their visa. **O3** to **O5** would entail one-off and yearly costs related to developing and maintaining the EU digital application platform: such costs would be slightly higher under **O4** compared with **O3**; and slightly higher under **O5** compared to **O4**. Therefore, **O2** would be the least costly for EU institutions and agencies, while **O5** would be the most costly option.

**Member States** would continue to spend time and incur costs due to the inefficient visa process under **O1**. **O2** would not produce significant cost savings during the application process for Member States, which would however save all current costs and time efforts related to managing the visa sticker. The same cost savings would also materialise under **O3** and **O4**. **O3** to **O5** would bring about an incremental reduction of the current administrative burden related to the application process, with savings doubling between options **O3** and **O4**. At the same time, Member States would incur one-off and yearly costs to develop and maintain the EU digital application platform: on average for one Member State such costs

[70] The amount saved per applicant is the same for the options 2, 3 and 4 (EUR 31), but as the number of the applications increase from O2 to O4 the total benefit increases accordingly.
[71] The World Bank – World Development Indicators, https://databank.worldbank.org/reports.aspx?source=2&series=ST.INT.RCPT.CD&country=AUT,BEL,BGR,DNK,EUU.

would be slightly lower under **O3**, and roughly the same under **O4** and **O5**. **O4** and **O5** would require slightly higher investments by Member States than **O3**, but these investments would be very largely offset by much higher cost savings under these two options. Nevertheless for **O5** the additional security risks in relation to the specific objective 2 would decrease the efficiency of this option (cost in relation to effectiveness).

**For third country nationals**, no cost savings would materialise under **O1** as they would continue to spend time and money on visiting a consulate/VAC to pick up their travel document with the visa sticker. **O2** would enable repeat applicants to save travel costs during the application process and pick-up costs (EUR 2.7 billion saved over 2025-2029). A slightly higher total cost savings would materialise under **O3** and **O4** due in part to a slightly higher number of visa applications allowed by the introduction of a single EU application platform. In addition, the overall efficiency is expected to be higher for third country nationals under **O4** than **O3** as they will be able to use a single application platform whatever their Member State of destination would be. This would save them time and efforts to apply as they would also be able to save and reuse their data for a subsequent application. Moreover, under **O3** some Member States might neither use national digital tools nor the EU application platform, which would be sub-optimal for third country nationals. Under **O5** all third country nationals (including first-time applicants) would save these costs, and it would be the most beneficial option for third country nationals (EUR 6.8 billion saved over the 2025-2029 period)[72].

The main benefits would appear for Member States and visa applicants. The reduction of administrative costs for Member States and of application costs for visa applicants would be substantial even with a stable number a visa issued/traveller throughout the period (16.9 million applications per year, cf. annex 5 sensitivity analysis). Even if the proposal would not generate any GDP contribution, the benefits still largely outweigh the costs.

***Table 5:*** *Overall result for the efficiency criterion*

| Criteria | Option 1 | Option 2 | Option 3 | Option 4 | Option 5 |
|---|---|---|---|---|---|
| EU-level & Member States | 0 | 1.5 | 1.7 | 2.5 | 1.5 |
| Third country nationals | 0 | 1.5 | 1.5 | 2 | 2.5 |
| **Overall efficiency** | **0** | **1.5** | **1.6** | **2.25** | **2** |

**O4** gets the highest score with 2.25, followed by **O5** (2).

### 7.3. Other impacts

**For personal data protection and coherence with EU Charter of Fundamental Rights**, a score on a 0 to 3 scale was used (3 indicating the maximum protection of personal data/coherence with fundamental rights, 0 indicating the lowest protection, equalling to minimum compliance with data protection and fundamental rights law).

[72] The cost savings under O5 are higher than the costs under the baseline (EUR 8.3 bn vs EUR 7.4 bn). This is due to the higher number of applicants under option 5 that under the baseline due to the incentive to travel triggered by digitalisation. The savings per applicant (EUR 74) are therefore multiplied by a higher number of applicants than in the baseline, which result in a higher amount of cost savings.

### *7.3.1. Data protection*

As underlined by the EDPS, the higher degree of digitalisation, the greater the risks to data protection. This guiding idea is reflected in the scores on data protection.

**Opportunity to further standardise data protection practices**

**O1** would ensure full compliance with data protection law, but no standard would be applied across Member States to enhance data protection practices via higher standardising. Under **O2,** mandatory standards would introduce technical and operational changes that may enhance data protection by enhancing security and level of compliance, and have effect of further harmonising national practices. **O3** to **O5** would significantly harmonise data processing practices across Member States thanks to the EU visa application platform. However, under **O3** a subset of Member States would continue to apply their own practices subject to EU standards. **O4** and **O5** would allow for the greatest opportunity to apply improved data protection practices for visa processing in a more harmonised way. Both options would also offer opportunities to implement common training & practices due to the use of a single tool by Member States. The systematic integration of the "data protection by design" principle will allow mitigating data privacy and security risks associated to data protection at development stage.

**Handling of personal data by ESPs**

Under **O1,** the personal data of visa applicants would still be exposed to ESPs as is currently the case. **O2** to **O5** would progressively change the involvement of ESPs in relation to personal data. The new processing that ESPs would need to carry out to enhance identification of applicants for the consulates would slightly increase the handling of personal data by ESPs under **O3** to **O5** to prove that they have correctly identified the applicant. Nevertheless, under O3 to O5, repeat applicants would no longer to use ESPs services and therefore data exposure to third parties should decrease.

**Data security**

**O2** would not significantly expose personal data of third country nationals to higher security risks than it is currently the case – except for the data that can be consulted via the web service in **O2**. Options **O3** to **O5** would lead to new data security implications due to the EU visa application platform, and **O5** would add implications related to biometric data submitted digitally. **O5** would entail the most significant data security implications, that could however be mitigated if implemented in a "privacy enhancing" way. Under options implying the use of the EU Visa application platform, the choice of the hybrid or decentralised sub-option for the storage of data would avoid the risk of having a single point of failure and attacks.

Data protection would therefore slightly improve with the reduction of exposure of personal data to ESPs, with a slightly better score under O4 allowed by the standardisation of data protection practices with the generalisation of the EU Visa application platform. O5 would score negatively because the self-enrolment of biometrics would create additional risks of data exposure.

***Table 6**: Overall result for the data protection criterion*

| Criteria | Option 1 baseline | Option 2 | Option 3 | Option 4 | Option 5 |
|---|---|---|---|---|---|
| Protection of personal data | 0 | 0.5 | 0.75 | 1 | -1.5 |

### *7.3.2. Coherence with the EU Charter of fundamental rights*

Under **O1** and **O2** the visa process would be mostly paper-based and visa applicants would have the possibility to receive on-site assistance from ESP or consulate staff. These options would therefore have a positive impact in terms of ensuring the equal treatment of visa applicants, including those with low IT literacy/access and those who are unable to see or hear. **O1** will not significantly improve access to the procedure for persons with disabilities reducing their mobility considering that they would still need to visit a consulate/VAC often.

Under **O3** to **O5**, people with reduced mobility would increasingly benefit from the lower need to visit a consulate/VAC. On the other hand, these options would limit the possibility to have recourse to a paper-based, in-person process as a rule, which can be more adequate for certain categories of applicants. Under these options these applicants would still be able to apply at a consulate/VAC if the assistance provided by the EU visa application platform, by service providers and family/friends is not sufficient[73].

For people with impaired vision, applying online will most likely be an improvement as digital application platforms, either at EU or national level, have to comply with Accessibility Directive under which Member States have to ensure that 'public sector bodies take the necessary measures to make their websites and mobile applications more accessible by making them perceivable, operable, understandable and robust'[74]. Websites should therefore allow changing the display of information (font size, colours, etc.) and could also offer audio assistance (reading out texts). These tools are not, or to a lesser extent, possible with paper applications. In addition, **O4** and **O5** and to a lesser extent **O3** would guarantee high accessibility to people unable to see or hear across all Member States, because the standards and features embedded in the EU application platform would be applied by all countries.

In the same vein, under **O3** to **O5** people with low IT literacy/access would increasingly require technical assistance. Nevertheless this might be partially mitigated by the increase of IT literacy all over the world. In the first years, the immediate transition to full digitalisation under **O5** might create issues due to lack of IT literacy of some applicants and the reluctance of some third country nationals to submit their biometrics for privacy reasons.

[73] This has been factored in the calculation of costs and benefits, assuming that 3% of the applications would still be made through paper applications. This would concern applicants who cannot apply online or applicants that are required to provide paper supporting documents. Given the applying through digital means will be far easier than through paper at the consulate, the percentage will be very low.
[74] DIRECTIVE (EU) 2016/2102 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 26 October 2016 on the accessibility of the websites and mobile applications of public sector bodies.

As to the **rights of the child**, the applicable legislative regime which guarantees the on-site process for children would remain in place. The revised VIS introduced changes aimed particularly to strengthen the fight against the abuse of children's rights by lowering the fingerprinting age (from 12 to 6 years), but also imposing strict safeguards to biometric data of children, in particular by limiting the storage period of the data: fingerprints and facial images pertaining to children below the age of 12 will be erased upon the visa having expired and the child having exited the external borders. For repeat applicants with children, a new repeat application will necessitate another on-site procedure in all such cases (relevant for **O1-4**). Given that **O5** will not require any visit to the consulate or ESPs, it will be slightly less adequate in relation to the rights of child.

Overall, all policy options comply with the fundamental rights enshrined in the EU Charter. Nevertheless **O5** score is lower than the other options due to the absence of physical visit of the applicant and his/her child to apply for a short-stay visa.

***Table 7**: Overall result for fundamental rights criterion*

| Criteria | Option 1 | Option 2 | Option 3 | Option 4 | Option 5 |
|---|---|---|---|---|---|
| Coherence with Charter of Fundamental Rights | 0 | 0 | 0 | 0 | -0.5 |

### *7.3.3. Political feasibility and proportionality*

Considerations on the proportionality and political feasibility are not criteria of the evaluation per se but are indicated as additional information on each option in the context of this impact assessment.

- ***Political feasibility***

The status-quo under **O1** would be feasible because no legislative amendments would be needed and the European Commission but could be perceived as insufficient by the Member States. While the same concept of standards would be adopted in **O2**, the standards would be mandatory and require more efforts and discussions to be agreed upon. In addition, the digital visa would require amendments. However, **O2** would meet more effectively the objectives and the political climate, and hence be more feasible.

On the basis of targeted consultations of Member States on this initiative, it seems that it would be slightly easier under **O3** to get a political agreement as Member States would be left the choice to join or not the EU application platform and some may favour they own tools already in operation over an EU system which only exists on paper at this point in time. However, this can be expected to evolve over time as the EU system leaves the drawing board and becomes reality through the application platform prototype currently being developed by the Commission with eu-LISA to test and demonstrate the benefits of a single application platform. In addition, under **O4** the transition period (e.g. five years) as well as the hybrid architecture system, allowing Member States to re-use part of the investments carried out for their national portals, should allow a smooth process to join the EU single application platform. In addition, it might be expected than the European Parliament would be supportive of a single EU application platform at EU level for all Member States. Under **O5** the absence of a

transitional period, which would discourage some Member States and the online biometric enrolment, which is likely to be endorsed by only two Member States could be disproportionate vis-à-vis the various policy objectives, because it is not per se required to make the EU more digital and to simplify to a large extent the current process, and because it is bound to decrease the security of the visa process.

- ***Proportionality***

All options except **O5** would not go beyond what is necessary to achieve the objectives. **O5** would achieve the objectives to a certain extent (except security objectives), but would introduce a measure – the online biometric enrolment – that would be disproportionate vis-à-vis the objectives to be achieved (in particular due to its impact on security, cf. 6.2.1).

**Conclusion on the comparison of options**

**O1** would only partially achieve some of the objectives, and to a large extent because it would maintain the visa sticker. Existing problems and costs would largely persist for all stakeholders despite more Member States being expected to operate a national online portals in the coming years.

**O2** would perform better than **O1** in all departments. It would achieve the policy objectives to a wider extent, although it would not simplify and harmonise the visa process to achieve the objectives of the initiative. In terms of efficiency, **O2** would enable some cost savings and efficiency gains for Member States and third country nationals. Overall, given the political consensus around visa digitalisation, **O2** would be politically more feasible than **O1**.

**O3** would perform better than **O1** and **O2** in all departments, except for environmental impact. It would go an extra step in simplifying and harmonising the visa process, although the optional EU visa application platform is a key limitation and drawback in terms of improving attractiveness and simplification of procedures for third country nationals. In terms of efficiency, **O3** would require substantial one-off and yearly investments from the EU and the participating Member States but would produce higher long-term cost savings and efficiency gains for Member States and third country nationals compared to **O2**. Nevertheless, the costs attached to this option are underestimated as the costs of development of national portals for those Member States who will not opt for the EU visa application platform are not taken into account in this assessment as they are impossible to assess[75].

By extending the benefits of the EU visa application platform to the whole Schengen Area, **O4** would perform better than **O3** in terms of effectiveness as it would be the best option to achieve the objectives described in the intervention logic. It would significantly improve the external image of the Schengen Area compared to **O3**. In terms of efficiency, **O4** would still require one-off and yearly investments from the EU and from all Member States but would also produce high long-term cost savings and efficiency gains for all Member States than **O3**. In addition, it would enable higher cost savings for

[75] The amount of these costs would depend on the decision of the Member State to join or not the EU visa application platform if option 3 is finally retained as the preferred option and the level of digitalisation of this Member State at the time of the adoption of the EU regulation.

third country nationals. In relation to other impacts, **O4** would be a good option from the point of view of data protection and compliance with the charter of fundamental rights, provided the right safeguards are put in place in its implementation.

**O5** would simplify/harmonise the visa process more than any other option; however, it would impact negatively EU security, performing worse than **O1** in this area. In terms of efficiency, **O5** would require similar investments to **O4** from the EU and the Member States and would produce the highest cost savings for third country nationals but its efficiency for Member States would be reduced as it would undermine the security of the Schengen area.

Overall, **O4 is considered the preferred option** as it would best achieve all the objectives set by the initiative. It would simplify and harmonise the visa application procedure and would reduce the administrative burden and costs for visa applicants and Member States. It would also be the best option from a security point of view. **O4** would also be a good option with regards to data protection and fundamental rights. Regarding its impact on environment, **O4** would reduce paper consumption and CO2 emissions linked to the application process. The additional amounts of CO2 linked to additional travellers to the EU would very much on the additional number of travellers and on the expected reduction of air travels carbon footprint, which are difficult to predict.

## 8. PREFERRED OPTION

### 8.1. Why O4 is preferred policy option

**O4** implies the development of a mandatory EU digital visa application platform for Schengen visas and mandates the use of the digital visa. A transitional period of five years would be envisaged to enable those Member States using or developing their own national visa portals to phase out their national solutions and join the EU initiative. The adhesion of Member States to the EU visa application platform will happen gradually, as not all Member States are expected to need the full transitional period.

Under this option, third country nationals can apply for a Schengen visa entirely online, via the platform. For first time applicants, for repeat applicants every five years, applicants travelling with children and applicants who will be travelling on a different travel document than the one used for previous visa applications, it would still be necessary to travel to the consulate or VAC to provide biometrics and for identification purposes.

The preferred option would contribute to **tackle the root causes** of the current problems and would remove the fragmented and paper-based visa application process and harmonise the current heterogeneous levels of digitalisation.

Although the preferred option envisages the implementation of an EU visa application platform and gives third country nationals the possibility to lodge their application and file their supporting

documents digitally, some third country nationals might still need to go to apply in person using the paper process. The assumption is that each year across the Schengen Area 3% of visa applicants will not utilise the digital solution even if it is available and will still apply in person using the paper process.[76] This has been reflected in the cost and benefit calculations. **O4** also presents some relative weaknesses that would be nevertheless largely outweighed by its comparative advantages. Firstly, **O4** would involve relatively high costs for EU institutions linked to the implementation of the EU visa application platform[77] in comparison with the cost of other options (**O2** and **O3** to a lesser extent). The political feasibility of **O4** may be slightly lower than **O1**, **O2** and **O3**, due to the obligation for Member States to phase out their national portals at the end of the transition period to join the EU visa application platform. Nevertheless this would be mitigated by a long transition period proposed (e.g. 5 years) and the choice of the decentralised option for the storage of applications that would mitigate potential sunk costs for Member States who have already partially digitised their application process (see 8.2.1). In addition, it must be stressed that the impact assessment did not take into account the cost for Member States to develop their own national application portals in the absence or in addition to the EU visa application platform as this would have been impossible to assess[78]. Taking into account this parameter would have further decreased the efficiency of options **O2** and **O3** and would have further reinforced the comparative performance of **O4** relating to efficiency.

The operational objectives pursued by O4 will be the following ones:

- To reduce the costs associated with the visa application for Member States
- To reduce the costs associated with the visa application for third country nationals
- To reduce the need for visa applicants to be physically present themselves at the consulate
- To replace the visa sticker by a digital visa
- To allow all visa-required travellers to apply through a single application tool
- To increase the flow of visa required travellers in Europe

### *8.1.2. Benefits linked to the introduction of an EU visa application platform for Member States*

The main change would be that third country nationals would now be able to use one environment - the **EU visa application platform-** to submit their visa application fully online, including supporting documents and travel document and to view their digital visas (or refusals), regardless of the Member State where they apply. This, combined with an EU visa application platform implementing a unified and harmonised approach to visa digitalisation, will create a set of benefits for Member States and third country nationals and make the overall application process more efficient. The EU visa application platform would create the following benefits:

[76] This would concern applicants who cannot apply online or applicants that are required to provide paper supporting documents.
[77] Between EUR 33.8 and 41.2 million (one-off cost) and EUR 10.5 and 12.8 million (yearly cost) – Study to assess the various options related to visa process digitalisation and to support the preparation of an impact assessment - Final Report, available: https://ec.europa.eu/home-affairs/study-assess-various-options-related-visa-process-digitalisation-and-support-preparation-impact_en.
[78] This calculation would have required hypothesis on the number of Member States who would have wanted to develop their own portal under O1, O2 and O3, a very detailed assessment of the digitalisation of their visa application process and hypothesis on the IT solutions retained to calculate their costs.

1. **Reduction of the administrative burden and costs for Member States:**

- **Less time answering queries by applicants for ESPs and consulates**. This comes as a result of the platform's interactive guidance and chatbot. The assessment estimates up to 576 FTEs[79] could be saved across all Member States over the 2025-2029 period.
- **Reduction of processes linked to paper visa applications**, i.e. taking in a paper application, encoding it and collecting the visa fee, would also decrease since the consulates would no longer need to do this manually. The assessment estimates up to 867 FTEs[80] saved across all Member States over the 2025-2029 period.
- **Filing and archiving of paper applications would no longer be needed**. The assessment estimates up to 4 248 FTEs[81] saved across all Member States over the 2025-2029 period. Since the documents no longer need to be archived for two years at the consulates, the associated costs can be saved. The feasibility study[82], conducted in 2019, had estimated these costs up to EUR 920 000 yearly across all Member States, i.e. EUR 4.6 million over the 2025-2029 period. Under O4 Member States would only spend a small amount corresponding to the remaining storage of 3% of the paper applications, i.e. a total saving of EUR 4.4 million over the 2025-2029 period for all Member States. On top of that, consulates would no longer need to pay the costs to destroy the applications and supporting documents after the end of the retention period. These costs were estimated up to EUR 5.0 million across all Member States on a yearly basis[83].

2. **Mitigation of sunk costs for Member States having already invested in digitalisation:**

**The choice of the hybrid/decentralised architecture system under O4 (see point 8.2.1) would allow mitigating sunk costs for Member States who have already invested in digitalisation.** Member States which already offer a digital application form could potentially re-use the integration to upload application forms in their national systems used for processing applications (e.g., registration in VIS) for the EU Application platform. In addition, Member States could also reuse some investments made in infrastructure, such as storage capacity. The transition period of years would also mitigate potential sunk costs of Member States. Taking into account the development phase of the platform (2 years) and its go live date, as from which the transition period of five years will start, Member States will have the time (7 years if a five-years transition period is eventually retained) to amortise their investments and prepare the transition to the EU Visa application platform. Additionally, Member States will be able to use EU funds available under the Border Management and Visa Instrument (national programmes) to finance their investments at national level, facilitating the transition towards the EU Visa Application Platform.

3. **Other benefits:**

[79] Study to assess the various options related to visa process digitalisation and to support the preparation of an impact assessment - Final Report, available: https://ec.europa.eu/home-affairs/study-assess-various-options-related-visa-process-digitalisation-and-support-preparation-impact_en.
[80] Idem.
[81] Study to assess the various options related to visa process digitalisation and to support the preparation of an impact assessment - Final Report, available: https://ec.europa.eu/home-affairs/study-assess-various-options-related-visa-process-digitalisation-and-support-preparation-impact_en.
[82] Study on the feasibility and implications of options to digitalise visa processing, 2019, available: https://op.europa.eu/s/pgU6.
[83] Study on the feasibility and implications of options to digitalise visa processing, 2019, available: https://op.europa.eu/s/pgU6.

- **The EU visa application platform would directly reduce the cases of visa shopping**. With one single way to apply for a short-stay visa, applicants would not be tempted to go for the easiest and most expeditious way of applying, independently of the Member State(s) where they intend to travel. Applicants should be required to fill out a brief questionnaire after which the platform will automatically redirect the applicant to the correct Member State. This, together with the cross-referencing of these answers with the data submitted by the applicant, makes it more difficult, if not impossible without fraudulent information, to engage in visa shopping[84].
- **A more efficient** process linked to VIS pre-admission checks. Before submitting an application the VIS read-only database would be checked for the presence/validity of biometrics which is one of the admissibility criterion. An application would not be submitted if these checks show that there are no valid biometrics available in the VIS.

The preferred option would harmonise and digitalise the visa process across Member States, improving the efficiency of the overall process. It would project outside the EU a unified and coherent image of the visa policy and improve visibility of the EU action in this area. Implementing a mandatory EU visa application platform would give significant substance to the Commission's ambition expressed in the New Pact on Migration and Asylum, to have the visa procedures fully digitalised by 2025 to reinforce trust in the Schengen area.

*8.1.3. Benefits linked to the introduction of a digital visa for Member States*

The preferred option would remove the obligation to issue a paper visa sticker through legislation and would oblige Member States to issue a digital visa and to check an individual's visa through his/her biometrics or with an encrypted 2D barcode. The feasibility study[85] determined that the digital visa should be implemented with a 'fall-back solution' in case VIS is not available, e.g. central system failure or local network failures. The study identified an encrypted 2D barcode[86], received by the applicant when his/her visa is issued, to be the most secure and fraud-proof fall-back solution. As a result, the **internal security of the Schengen Area would improve**, as the visa sticker could no longer be falsified[87].

The biggest positive impacts of the digital visa are related to administrative burden. The introduction of the digital visa would considerably **reduce the administrative burden** on Member States central authorities and consulates. Central authorities would no longer have to spend time and money on manufacturing, ordering and securely transporting visa stickers to the consulates. Consulates on the other hand would no longer need to spend time on printing the sticker and affixing it to the passport or on a separate sheet in case the travel document is not recognised by the Member State. The analysis estimates the equivalence of nearly 4 014 FTEs could be freed up across Member States consulates

[84] The replies of the applicant to the introduction questionnaire will automatically be compared to the data he filled out in the application, e.g. when an applicant indicates (in the questionnaire) that he is visiting France for tourism, but then (during the application) indicates hotel reservations in Germany.
[85] Study on the feasibility and implications of options to digitalise visa processing, 2019, available: https://op.europa.eu/s/pgU6.
[86] This fall-back solution will re-use existing national solutions for printing an encrypted 2D barcode on the visa sticker, available from May 2022.
[87] Cases of visa sticker fraud were already limited and as long as every travel authorisation is checked with biometric data against VIS data, there is no opportunity to cross the border illegally. With the digital visa and EES, every traveller will need to be checked against the VIS with his/her biometric identifiers, removing any opportunity for fraudulent activities.

over the 2025-2029 period. Cost savings related to the stickers themselves are estimated at approximately EUR 80.3 million across all Member States over the 2025-2029 period.

The impact assessment assumes that the systems that will generate the encrypted 2D barcodes will be the same as the systems currently being set up by Member States to generate a 2D barcode to be printed on the visa sticker, leading to no impact at the national level. The change of generating one type of barcode to another type of barcode can be considered as part of the normal system evolutionary lifecycle.

Overall, the costs and benefits for Member States linked to the introduction of an EU digital visa application platform and to a digital visa are summarised in the table below:

***Table 8**: Summary of costs and benefits for Member States*

| Costs | Per Member State (average) | All Member States | Benefits | Per Member State (average) | All Member States |
|---|---|---|---|---|---|
| **One-off IT costs**[88] | EUR 2.8 million – EUR 3.3 million | EUR 68.3 million – EUR 83.5 million | **Saved time of consulates over five years in FTEs** | 372 FTEs | 9 685 FTEs |
| **Yearly IT cost**[89] | EUR 460 000 – EUR 570 000 | EUR 11.6 million – EUR 14.1 million | **Saved time of consulates over five years in monetary terms**[90] | EUR 19.7 million | EUR 510.9 million |
| **Total IT costs (2025 – 2029)** | EUR 5.1 million - EUR 6.2 million | EUR 126.3 million – EUR 154.0 million | **Costs saved on paper storage and on visa stickers** | EUR 3 million | EUR 79 million |
| **One-off training costs** | EUR 33 000 | EUR 858 000 | | | |

*Source: Study estimates based on data provided by Member States, eu-LISA and the 2019 feasibility study.*

### *8.1.4. Benefits for visa applicants*

The preferred option has far-reaching **implications for third country nationals**. The EU visa application platform, offering virtually the same features and services to applicants[91], and the digital visa would result in a **saving of EUR 2.9 billion for third country nationals**, mainly because the need to travel during the application process is considerably lowered compared to the baseline situation **-O1** and **O2**. Pursuing **O4** would **largely harmonise the currently fragmented landscape** of application procedures in the Member States, and **improve the image of the EU** as a unified entity in line with the common visa policy.

[88] Including connection to the EU platform; adaptation of national system(s); and upgrades for data storage.
[89] Including operation and maintenance of the platform and VIS.
[90] Assuming a labour cost of EUR 25 per hour.
[91] It should be noted that this is not the case during the transitional period, in which not all Member States will be enrolled yet. This could potentially increase the confusion for third country nationals. However, this period will eventually end, resulting in the permanent abolishment of the fragmented landscape.

The possibility for repeat applicants to lodge their application, upload their supporting documents and pay the visa fee through the EU platform, removing the need to travel to the consulate or VAC in person would produce substantial economic benefits. In principle, under **O4** the overall group of repeat applicants (assumed to be 25% of the total number of applicants[92]) would no longer need to spend money on travel and accommodation, resulting in a maximum net saving of EUR 260 million in 2029 (i.e. EUR 1.3 billion over the 2025-2029 period).[93] In practice, the benefits are likely to be lower because certain applicants may not be allowed/able to submit all supporting documents via the EU visa application platform[94] and the impact of Multiple-Entry Visas (MEVs) needs to be borne in mind although it cannot be assessed in the context of this report[95].

Furthermore, the digital visa and the abolition of the paper visa sticker would end the need for third country nationals to travel or pay a courier to pick up the travel document after the examination process. Besides, applicants would no longer need to leave their travel document during the application process, enabling them to use it for identification purposes and to travel abroad or back to their country of origin if they have to apply in a neighbouring country. In the baseline scenario, the travel and courier cost for all third country nationals would amount to up to EUR 318 million for 2029 alone[96] (i.e. EUR 1.6 billion over the 2025-2029 period). The introduction of the digital visa under **O4** would remove this expenditure. This entails a large benefit for third country nationals, as respondents to the public consultation indicated that travelling to the consulate or VAC is the second biggest challenge related to the visa application process. 92% of the respondents of the public consultation indicated that the implementation of digital visa would facilitate the Schengen visa application procedure.

**O4** would not affect the right of third country nationals who are family members of EU mobile citizens to have their applications processed via accelerated and costless procedure and to be granted with every facility to obtain the necessary visas. They would still be allowed to lodge their application directly at a Member State consulate without any cost, if they decide not to use the EU visa application platform. Furthermore, the applications of these third country nationals submitted through the platform would be processed as priority files, reflecting their privileged position enshrined in EU Law[97] and they would be exempted from the visa fee as it is the case today.

[92] Assumption validated with eu-LISA. No official statistics are collected on the share of first-time and repeat applicants.
[93] Based on an average expenditure of EU 56.89for a TCN for travel and accommodation during the application process. This figure has been estimated based on the indications on travel costs provided by 246 respondents to the public consultation. It should be noted that 3% of the repeat applicants to still travel to the consulate to lodge their application in paper are expected. This is reflected in the estimates.
[94] This will be due to technical difficulties and/or low IT literacy, especially in the short term; and also to the risk profile of each applicant: citizens of countries having a low risk profile are likely to be allowed to submit all documents online; however, as certain supporting documents incorporate security features only on paper, Member States are still likely to require this evidence on paper from citizens of countries with a high risk profile.
[95] MEVs represent a significant share of Schengen visas and allow visa holders to enter the Schengen area multiple times over a pre-defined period of time, usually up to five years. If travellers hold MEVs, they would be able to make as many trips as they wish to the Schengen area until the period of validity of the visa expires without having to incur the current costs of applications. Whilst MEVs are an existing tool to reduce costs for third country nationals, the EU platform would deliver substantial benefits on top. This is because MEVs very rarely cover the whole period before a new requirement to submit biometrics (i.e. 5 years), and several third country nationals are likely to travel more than once at intervals of e.g. 2-3 years, i.e. outside the usual period of validity of a MEV. Moreover, the implementation of the "cascade" system foreseen in the Visa Code, by which third country nationals can benefit from increasingly longer MEVs the more visas they are issued, will still take a few years.
[96] Given the assumption that the amount of third country nationals that travel to obtain the travel documents and third country nationals that pay a courier are split evenly. This amount is based on the indicated cost of third country nationals within the public consultation, which includes 241 observations for third country nationals that travel and 230 observations for third country nationals that paid a courier.
[97] In accordance with Article 21 TFEU, Directive 2004/38/EC, Article 1(2)(a) of the Visa Code) and part III of the Visa handbook.

The aforementioned cost savings resulting from an easier online application under **O4** would apply to these EU citizens' family members as well and would largely outweigh the benefit of visiting the official representation of Member State under the expeditious procedure currently in place. This would be especially the case if the third country national lived far from a city hosting a consulate of the selected Member State. For those family members who would however decide to lodge their application directly at Member State consulate, there would be no change as this possibility would still be available and without any costs.

***Table 9**: Summary of costs and benefits for third country nationals*

| Costs | Baseline | Option 4 | Net benefits |
|---|---|---|---|
| **Average costs for one third country national during the application process related to travel and accommodation** | EUR 57 | EUR 43 | EUR 14 |
| **Average costs for one third country national related to obtaining the travel documents via courier/pick-up** | EUR 17 | EUR 0 | EUR 17 |
| **Total average costs for one third country national per application in addition to the visa fee[98]** | EUR 74 | EUR 43 | EUR 31 |
| **Total cost for all third country nationals for 2025-2029** | EUR 6.5 billion | EUR 4 billion | **EUR 2.9[99] billion** |

*Source: Study estimates based on data provided by Member States and third country nationals (open public consultation).*

### *8.1.5. Increased security of the Schengen area*

The transition to a visa application process handled via an EU visa application platform and relying on the digital visa would strengthen **the security of the overall process**, contribute to the security of the Schengen external borders, and increase trust amongst Member States.

**The digital visa would considerably reduce security risks compared to the visa sticker**. This would be the case also in a fall-back scenario, i.e. where checks against VIS and other EU information systems are technically not possible. It would not be possible to steal blank visas stickers, as it is often the case in Member States consulates today[100]. Moreover, the digital visa may enable Schengen border authorities to save time: assuming 10 seconds to verify a visa sticker,[101] border guards in the Schengen Area would save up to 30 FTEs per year.[102] It needs to be noted that these are maximum theoretical benefits that may in practice be lower if currently border guards: a) spend less time to verify a sticker in certain BCPs; and b) verify the sticker while performing other verifications or interviewing the traveller, i.e. tasks that would remain in place under **O4**. **O4** will harmonise formats and data quality of supported documents uploaded on the EU application platform which provide additional safeguards regarding detection of forged documents.

[98] Given the 75/25 split between first time and repeat applicants.
[99] The total cost and benefit results from the multiplication of individual costs and benefits per the number of third country nationals (i.e. 112.5 million under O4).
[100] Member States are obliged under the Visa Code to report to the Commission on any significant loss of blank visas stickers. (Art 37 (2).
[101] Average based on estimates provided by Schengen border authorities.
[102] Based on the estimated number of Visa holder-third country nationals travelling to the Schengen Area in 2025. Study to assess the various options related to visa process digitalisation and to support the preparation of an impact assessment - Final Report, available: https://ec.europa.eu/home-affairs/study-assess-various-options-related-visa-process-digitalisation-and-support-preparation-impact_en for detailed calculations.

**O4 would free potential resources for scrutinising visa application.** As mentioned at point 8.1.2., the EU visa application platform would simplify the process for handling visa applications, enabling consulates to save around 1 423 FTEs per year, which, if Member States choose to do so, could be re-allocated to examination, allowing for a more thorough risk assessment which would further strengthen the security of the overall process and have positive spill-over effects on the border crossing process.

### *8.1.6. Benefits on the EU GDP linked to increase of travellers to the EU*

The impact of O4 on the EU GDP linked to the increase of travellers to the EU has to be considered carefully as it relies on an expected additional number of travellers in the 2025-2029 period which is difficult to predict. First the "natural" growth of travellers is difficult to anticipate. The estimates worked out in the context of this impact assessment rely on a very limited increase of travellers, with 16.9 million of visa applied for in 2023 (corresponding to the pre-Covid level) and stabilising to 17.8 million in 2025 with no increase until 2029. In addition the increased number of travellers linked to simplification of procedures through digitalisation is also difficult to predict, for reasons explained at section 6.4. The estimates take into account an increase of travellers of 2% under option 3 for travellers to Member States using the EU Visa application, with larger effect under **O4** due to the use of the platform by all Member States and 4% for O5.

***Table 10**: Summary of benefits on EU travel on GDP*

| | Baseline | Option 4 | Net benefits |
|---|---|---|---|
| **Yearly impact of EU travel on GDP (per year 2025-2029)** | EUR 78.5 billion | EUR 80.0 billion (2025)<br>EUR 81.6 billion (2026)<br>EUR 83.3 billion (per year 2027-2029) | EUR 1.6 billion (2025)<br>EUR 3.2 billion (2026)<br>EUR 4.8 billion (per year 2027-2019) |
| **Overall impact of EU travel on GDP (2025-2029)** | EUR 392.3 billion | EUR 411.4 billion | EUR 19.1 billion |

*Source: Study estimates based on World Bank data on the contribution of international travel to the GDP.*

### *8.1.7. Impact of digitalisation on the role of ESPs*

The relations between ESPs and Member States are regulated by contractual relations Depending on the agreement between the Member State and the external service provider, the ESP might be currently entrusted with the performance of administrative tasks and collection of biometrics and are in no way responsible for adjudicating on visa applications.

In the context of digitalisation, their role will depend on what Member States will want to assign them in the context of the new procedures. In the short term, ESPs might be asked to provide assistance to applicants (e.g. assistance to people without or with low IT literacy) and their role might increase in the short term. However, with the digitalisation of the visa application process, a large part of administrative tasks currently entrusted to ESPs, such as inserting information from the physical application form, would disappear. In particular, the implementation of **O4** is very likely to have an **impact on ESPs** (who collect 90 % of applications worldwide), as applicants will be able to apply directly via the online application portal, if they do not need to provide biometrics in the context of

their application (for five years after the first application). Therefore, the role of ESPs with regards to collection of applications and providing assistance to this category of applicants should therefore decrease.

Once the digital visa is implemented consulates will no longer keep the travel document for the whole duration of the examination. This means that travel documents from third country nationals applying at VACs will not physically seen by consulates. One of the approaches envisaged could be to oblige ESPs to scan the travel document in three lights (infrared, ultraviolet and normal light) and make a video recording of the on-site identification and biometric enrolment. If this solution were to be implemented, ESPs would likely need some additional staff and resources. Other technical solutions could be used, for example using technologies to cross reference enrolled biometrics (facial image and fingerprints) with the biometric data embedded in the microprocessor chip of biometric passports.

Therefore, the role of ESPs in the context of digitalisation would depend on which tasks Member States would like to outsource to them in the new digitalisation context.

#### *8.1.8. Other benefits*

Another advantage of **O4** is that it may **significantly streamline the data collection, sharing and data handling practices of the Member States.** Presuming that the mandatory EU platform will have been set up, taking into account "privacy by design" from end-to-end, it may then contribute to implementing data protection requirements in a more harmonised way. In addition, given the compulsory nature of the EU visa application platform for Member States, training of national staff on how to comply with privacy and data protection rules and practices may benefit from economies of scale as all national staff will receive the same type of training.

**The right to non-discrimination for people with disabilities** would not be breached under **O4** as features such as speech recognition, audio transcription, etc. would make the EU platform accessible to most third country nationals affected by different disabilities for all applicant irrespective of the Member State to which they would apply.

In principle repeat applicants with reduced mobility within five years would no longer be required to visit a VAC or consulate to apply.

**O4** would offer safeguard to protect the **rights of the child** and prevent trafficking by implementing IT solutions in the EU application platform to alert the responsible consulate to apply extra care and possibly investigate even more thoroughly the circumstances of the new application (e.g. by requiring the applicants to do an interview).

With regard to the **environmental impacts,** the preferred option drastically reduces the amount of paper needed:[103] the visa stickers no longer need to be manufactured and the application and the

[103] If the status quo is maintained, all third country nationals together would use one million kg of paper alone for their application and supporting documents (given the assumptions that an average application entails 10 A4 pages, based on Annex II of the EU Visa Code on the non-exhaustive list of supporting documents, and one A4 page weights 0.05kg), as well as an additional 75 000 kg of paper for the non-recyclable visa stickers (given the assumption that one visa sticker entails the use of one A4 page.

supporting documents are lodged digitally. The travels to apply for repeat applicants and to pick up the visa sticker for all applicants will no longer be needed, which will have positive impact on the CO2 emissions. On the other hand, the additional CO2 emissions triggered by additional travellers are hypothetical because they rely on a hypothetical number of additional travellers which is difficult to predict. In addition, additional emissions might be partially offset by the efforts made by the aviation and transport sector to reduce the carbon footprint of airlines and airports[104] and by different ways of travelling that could have a positive impact on emissions[105].

***Table 11**: Option 4 - Summary of costs and benefits for the environment*

| Impact category | Baseline | Option 4 | Net impact |
|---|---|---|---|
| **Required energy and linked CO2 emissions related to the storage and management of data** | Negative impact | Positive impact | Positive impact |
| **The use and waste of paper for 2025-2029** | approx. 4.9 million kg in paper | Approx. 1.8 million kg in paper | Approx. 3.1 million kg in paper saved |
| **CO2 emissions related to travelling during the visa application process for 2025-2029** | Approx. 2.4 billion kg CO2 | Approx. 0.9 billion kg CO2 | Approx. 1.5 billion kg CO2 saved |
| **The environmental impact of the uptake in tourism in CO2 emissions for 2025-2029** | 0 kg CO2 | Approx. 2.9 billion kg CO2[106] | Approx. 2.9 billion additional kg CO2 emitted |

*Source: Estimates based on data provided by a study to assess the various options related to visa process digitalisation and to support the preparation of an impact assessment*

## 8.2. Sub-options

Three dimensions identified in the Inception Impact Assessment have been analysed in relation to the preferred option. For each dimension, two sub-options are considered.

The main findings are presented hereunder, highlighting which sub-option has been chosen for each dimension and why.

### *1.2.2. Architecture of the EU digital platform: centralised or hybrid*

The choice of the centralised or decentralised sub-option has been analysed in the context of the feasibility study on the digitalisation of visa procedures.

**Regarding the implications for data protection** of the two sub options for the architecture of the digital application platform, it is important to underline that these sub options concern the final storage of visa application files (including the supporting documents uploaded by applicants): the centralised architecture includes a centralised application file storage (by eu-LISA), whereas the hybrid architecture entails the storage at national (decentralised) level. This is without prejudice to the fact

[104] The airline industry is committing to decreasing its carbon footprint inter alia by increasing the efficiency of flights and the efficiency of fuel. See Thomas Reynaert et al., 'A route to net zero European aviation', *Destination 2050*, 2021, https://www.destination2050.eu/wp-content/uploads/2021/03/Destination2050_Report.pdf, a study conducted by major airline and space industry associations estimating the potential for greening the airline industry until 2050.

[105] Post COVID-19, travellers are expected to spend the same amount of time in a tourist location over a longer trip rather than travelling multiple times to that location, see World Travel and Tourism Council (WTTC), 'To recovery & beyond: The future of travel & tourism in the wake of COVID-19', 2020 p. 11 https://wttc.org/Initiatives/To-Recovery-Beyond.

[106] For the reasons explained at 6.3, these figures have to be considered carefully.

that a specific and well-defined sub-set of data from the application file has to be subsequently stored in a centralised EU database – VIS, according to the current rules of VIS regulation, which will not change. According to the European Data Protection Supervisor (EDPS), a downside of a centralised database, regardless of limitations of access rights, is that there is a single point of failure and attacks. Therefore, **such a solution is more prone to technical errors and to security breach**. Data protection safeguards will be included in the legislative proposal, as well as during the implementation stage, using the principles of data protection by design and by default. Data stored in the EU visa application platform would be safeguarded using privacy-enhancing implementation measures. The feasibility study therefore concluded that the centralised storage of visa application files is neither necessary, nor proportionate from data protection point of view.

**From the point of view of Member States (users of the platform),** the feasibility Study and the analysis conducted in this Impact Assessment identified a strong preference of Member States for the decentralised architecture for the following reasons:

- Member States have physical ownership of the applications they need to process;
- It becomes easier to comply with any national regulations or other rules in place if the data is stored and managed by the Member State itself;
- Member States control the governance surrounding their own infrastructure; and
- Security and data protection principles can be more easily monitored on national infrastructure.

**The decentralised or hybrid option would also allow mitigating potential sunk costs under O4 for Member States who have already invested on digitalisation.** Member States could potentially re-use the integration to upload application forms in their national systems used for processing applications (e.g., registration in VIS) for the EU Application platform. In addition, Member States could also reuse some investments made in infrastructure, such as storage capacity.

**Regarding the costs attached to each sub-option**, the feasibility study carried out in 2019 has shown that the hybrid (or decentralised) one would be more expensive than the centralised one[107]. However, for the abovementioned reasons, the centralised sub-option was assessed as less feasible from a legal, technical, security, data protection, operational and implementation point of view. The costs and benefits of each policy option presented in this report have therefore been calculated on the basis of the decentralised or hybrid sub-option.

The hybrid or decentralised option has therefore been retained to underpin the operations of the EU Visa application platform.

[107] According to the feasibility study on the digitalisation procedures, the hybrid option would be 25% more expensive than the centralised one with a total cost of EUR 75-140 million over an eight year period. Of this, EUR 13.4-25 million would be for central systems while each Schengen country's national systems would incur a cost of EUR 2.2-4 million, both over the same period. The centralised option would come at a total cost of EUR 49-91 million over an eight-year period. Of this, EUR 24.6-45.8 million would be for central systems while each Schengen country's national systems would incur a cost of EUR 0.84-1.6 million, both over the same period.

8.2.2. Material scope: only short-stay visas or short-stay & long-stay visas

Regarding the application procedure, Member States are currently issuing long-stay visas which are very different in length and nature. Applications practices and regulations applied by Member States to long-stay visas differ greatly as long-stay visas applications are not harmonised at EU level, unlike short-stay visas with the Visa Code. An additional feasibility study is therefore required to assess the financial, technical and legal implications of the use of the EU visa application platform for long-stay visa applications[108].

Regarding the digital visa, Member States currently issue long-stay visas on the same paper visa stickers as short-stay visas, in accordance with the uniform format laid down by the Visa Sticker Regulation (Council Regulation (EC) No 1683/95)[109]. This Regulation also applies to Member States not yet fully applying the Schengen acquis. While the Visa Sticker Regulation only refers to short-stay visas, Regulation (EU) No 265/2010[110] amended Article 18 of the Schengen Convention to the effect that the uniform format is also made applicable to long-stay visas. That Regulation is based on both Article 77(2)(b) and (c) and Article 79(2)(a) TFEU. In addition, long-stay visas issued by Schengen Member States will be recorded in the future revised Visa Information System (VIS) where they are accessible for border guards and police (for inland checks). Carriers will be able to check the validity of long-stay visas through the carrier gateway in a read-only copy of the VIS. In addition to this legal aspects, a first estimate has shown that an extension of digital visas to long-stay visas would enable the Member States to save an additional 600 FTEs in addition to the ones saved on printing short-stay visas[111].

It is therefore recommended to extend the digital visa to long stay visas and for the time being not to extend the use of the EU Visa application platform to long-stay visas.

### *1.2.3. Fall-back solution for digital visa: simple or digitally signed barcode*

Sub-option 1 – Visa issuance notification would consist of an electronic notification sent by the Member State issuing the visa to the visa holder informing the latter that the visa has been granted. It can be shown either on paper (print-out) or from a digital device. Sub-option 2 – Visa issuance notification with digitally signed 2D barcode would be the visa electronic issuance notification plus a 2D barcode containing the same data as the VIS record that has been encrypted with a digital seal by the Country Signing Certificate Authority (CSCA) of the issuing Member State.

[108] A first assessment of the costs is presented in the Study to assess the various options related to visa process digitalisation and to support the preparation of an impact assessment - Final Report, available: https://ec.europa.eu/home-affairs/study-assess-various-options-related-visa-process-digitalisation-and-support-preparation-impact_en.
[109] Council Regulation (EC) No 1683/95 of 29 May 1995 laying down a uniform format for visas (Official Journal L 164, 14/07/1995 p. 1-4 https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A01995R1683-20170817
[110] Regulation (EU) No 265/2010 of the European Parliament and of the Council of 25 March 2010 amending the Convention Implementing the Schengen Agreement and Regulation (EC) No 562/2006 as regards movement of persons with a long-stay visa OJ L 85, 31.3.2010, p. 1–4 https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32010R0265.
[111] Study to assess the various options related to visa process digitalisation and to support the preparation of an impact assessment - Final Report, available: https://ec.europa.eu/home-affairs/study-assess-various-options-related-visa-process-digitalisation-and-support-preparation-impact_en.

Compared to sub-option 1, sub-option 2 would ensure a higher level of security in case VIS cannot be reached for technical failure at central level or at the border crossing point/checkpoint.

In particular, sub-option 2 would:

- Provide visa holders with a reliable proof of valid visa;
- Enable reliable border and land checks if VIS is unreachable (fall-back solution), ensuring a higher level of security than the visa sticker;
- Enable checks by third-country authorities cooperating with Member States.

The encrypted 2D barcode will be readable through mobile devices running a publicly available mobile application. Border crossing points and Member Sates police authorities will need to be equipped with appropriate smartphones for scanning and reading barcodes.

The main use case for including a fall-back solution is to fill any security gaps resulting from the temporary impossibility to access VIS in the context of border or land checks on visa holders, whereas authorities today can verify the paper sticker. Carriers might also have to rely on the fall back solution if the Read Only VIS cannot be accessed due to technical issues at central or local level. However, the intent of the Commission with the fall-back solution is not to introduce a new tool akin to the visa sticker, but as a secondary tool to be used only when necessary, and by other stakeholders insofar as they do not have access to VIS.

### 8.3. Application of the one-in-one-out approach

This section describes the expected impacts of the preferred option on EU businesses and citizens.

- ***Adjustment costs***

This initiative would not entail adjustments costs for the private sector as it would mostly concern public authorities and third-country nationals.

- ***Administrative costs***

Savings on administrative costs for EU citizens and businesses would be negligible.

- ***Indirect benefits***

*Tourism and travel sector:* although difficult to quantify (cf. consideration on impact on EU GDP section 6.4), the preferred option is expected to slightly increase the number of travellers, the demand for tourism and travel services including transport. This would benefit large EU-based operators and regional and local travel industry – i.e. travel agencies, intermediaries, local tourist consortia – and the whole supply chain of the tourism industry – hotels, hostels, restaurants, bars, and their respective suppliers. It will also create benefits for EU-based large companies such as airlines, cruise lines and

car rental operators, and for regional and local companies, such as ferry operators, bus line operators, etc.

*Lower risk of visa shopping* (Not quantified): by providing a single-entry point for all visa applications, the EU platform would oblige Third-country nationals to apply for the competent Member State. It would limit the input of misleading information on the Member State of entry.

Benefits for the visa examination process (Not quantified). If Schengen visa authorities re-allocate (part of) the saved staff thanks to digitalisation to decision-making, Member States may further improve the examination and risk assessment of visa applicants, thereby further contributing to EU security.

### 8.4. Sensitivity analysis on the preferred option

A sensitivity analysis on the preferred option has been carried out to look at how changes in a variable can change the result of the impact assessment. This has been done for the following parameters; a change in the visa application number, in particular with a stable number of visas issued as in 2019 (17.8 million applied for in 2025-2029), a delay in the implementation of the digital visa, a gradual achievement of the benefits of digitalisation as from 2025 and a lower or higher average time to process a visa application. The detailed results are available in Annex 6. All the analysis show that changing these parameters would slightly modify the costs and benefits but would not put into question the overall assessment of the preferred option. In particular with a stable number of visa applications (16.9 million instead of 17.8, the benefits for Member States would remain substantial (EUR 487 million instead of EUR 510.9 million. For visa applicants, the benefits would amount to EUR 2.7 billion instead of EUR 2.9 billion.

### 8.5. REFIT (simplification and improved efficiency)

Per the Commission's Regulatory Fitness and Performance Programme (REFIT), all initiatives aimed at changing existing EU legislation should aim to simplify and deliver stated policy objectives more efficiently (i.e. by reducing unnecessary regulatory costs). However, the proposal stemming from the impact assessment will be a new legislation that will modify the existing visa procedures. It will be implemented by amending Regulation (EC) No 767/2008, Regulation (EC) No 810/2009 and other regulations and by repealing Regulation (EC) No 1683/95. While this initiative has not been subject to REFIT initiative, it will significantly reduce the overall burden on administrative costs of Member States as mentioned in chapter 8.

The digitalisation of visa processes is considered as a new initiative, regardless of the fact that its introduction will also formally necessitate an adjustment of several existing legal acts. Introducing a visa application portal and digital visa is a major novelty that was not considered in the – targeted – amendment to the Visa Code in 2019. Therefore, even if digitalising the visa processes will amend the Visa Code again, it will not change any of its recently amended parts.

## 9. HOW WILL ACTUAL IMPACTS BE MONITORED AND EVALUATED?

It will be essential that the implementation of the preferred policy option and the achievement of the objectives is closely monitored. With the implementation of an EU visa application platform and the digital visa, the operations in the field of short-stay visas will be impacted, both for visa applicants and Member States. Monitoring and evaluation should also focus on potential risks in terms of data protection. A robust monitoring and evaluation mechanism would be crucial to ensure that the envisaged beneficial effects of the implementation of an EU visa application platform and of the digital visa materialise in practice.

Article 57 of the Visa Code and Article 50 of the revised VIS Regulation on Monitoring and Evaluation, that will be largely impacted by the proposed changes, already provide for the monitoring and evaluation obligations, e.g. to produce an evaluation of its application two years after all the provisions of the Visa Code have become applicable. This general principle of these articles will apply to the changes stemming from the adoption of the proposal on digitalisation of visa procedures.

Nevertheless, it is important to define some indicators that will allow measuring progress to reach the objectives. Indicators should measure both outputs and the impact of the implementation of digitalisation for the different stakeholders that are currently impacted by the current situation.

Information could be collected via the Visa Committee, Travel document Committee, Article 6 Committee and different agencies (e.g. eu-LISA, Europol, Frontex).

The proposed indicators will be based on the operational objectives identified for this proposal:

- To reduce the costs associated with the visa application for Member States;
- To reduce the costs associated with the visa application for Third-country nationals;
- To reduce the need for visa applicants to be physically present themselves at the consulate;
- To replace the visa sticker by a digital visa;
- To allow all visa-required travellers to apply through a single application tool;
- To increase the flow of visa required travellers in Europe.

***Table 12**: Monitoring indicators based on the operational objectives*

| Main objectives | Monitoring indicators | Data Sources |
|---|---|---|
| **To reduce the costs associated with the visa application for Member States** | ▪ Number of staff working on collecting/checking visa applications reduced by 40% in 2030[112] compared with 2021 (baseline scenario) | Member States |

[112] 2030 has been chosen because it would be seven years after the adoption of the legislation by the co-legislators (expected in 2024) i.e. two years development and five years transition period.

| | | |
|---|---|---|
| **To reduce the cost associated with the visa applicant for third-country nationals** | ▪ 100% of applicants able to receive their visa without having to travel in 2026<br>▪ 100% of repeat applicants able to fully apply online in 2030 | Member States – eu LISA |
| **To replace the visa sticker by a digital visa** | ▪ 100% of digital visas issued out of the total number of visas issued in 2026 | eu-LISA<br><br>Visa statistics provided yearly by Member States (Article 46 - Visa Code)<br><br>Ad-hoc questionnaires to Member States |
| **To allow all visa-required travellers to apply through a single application tool** | ▪ 95% of visa applications received through the EU Visa application platform in 2030 | eu-LISA |
| **To increase the flow of visa required travellers in Europe** | ▪ Increase of the visa-required travellers to Europe in 2030 by 5% compared with 2023 | Visa statistics provided yearly by Member States (Article 46 - Visa Code)<br><br>Eurostat |

## ANNEX 1 – PROCEDURAL INFORMATION

### 1. Identification of the lead DG

DG Migration and Home Affairs (HOME)

### 2. Political guidance, Agenda planning and Work Programme

The Communication for the New Pact on Migration and Asylum of 23 September 2020[113] identifies clearly the need for full implementation of the recently revised visa code and indicates that additional efforts on visa facilitation will bring more consistency and should encourage bona fide short-term mobility. The Pact envisages that by 2025, the visa procedure should be fully digitalised, by introducing a digital visa in passports and making it possible to submit visa applications online. In this context, the proposed initiative is fully aligned with the objectives of the new Pact on Migration and Asylum.

Additionally, the 2021 Commission Work Programme announced on 19 October 2020 that further work was to be done in order to "preserve and improve a functioning Schengen area"[114]. The legislative proposal for the digitalisation of visa procedures is included in the Commission Work Programme (Annex I), under the Commission priority "Promoting our European Way of Life" and in the context of the Schengen package.[115]

The initiative also fits with the general EU approach to encourage the modernisation and digitalisation of public services and the Commission communication[116] on the *2030 Digital compass: the European way for the digital decade*.

For DG HOME's Agenda Planning purpose the initiative is titled 'Proposal for a Regulation of the European Parliament and of the Council on digitalisation of the visa procedures by amending Regulation (EC) No 767/2008, Regulation (EC) No 810/2009 and other regulations and by repealing Regulation (EC) No 1683/95' with reference PLAN/2020/8747.

### 3. Organisation and timing

The impact assessment is based on a number of studies, reports and consultations. In Q1 and Q2 2021, the Commission has consulted stakeholders, organised meetings with experts and other interested parties in order to identify problems and develop options for possible action. The internal and external meetings organised in order to support the review are listed below.

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[113] COM (2020) 609 final, Communication from the Commission on a New Pact on Migration and Asylum, https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1601287338054&uri=COM%3A2020%3A609%3AFIN

[114] COM(2020) 690 final, Commission Work Programme 2021, A Union of vitality in a world of fragility, p.6, https://eur-lex.europa.eu/resource.html?uri=cellar%3A91ce5c0f-12b6-11eb-9a54-01aa75ed71a1.0001.02/DOC_1&format=PDF

[115] COM(2020) 690 final, Annexes to the Commission Work Programme 2021, p. 4, https://eur-lex.europa.eu/resource.html?uri=cellar%3A91ce5c0f-12b6-11eb-9a54-01aa75ed71a1.0001.02/DOC_2&format=PDF

[116] COM(2021)118 final, Communication from the Commission, 2030 Digital Compass: the European way for the Digital Decade, https://eur-lex.europa.eu/resource.html?uri=cellar:12e835e2-81af-11eb-9ac9-01aa75ed71a1.0001.02/DOC_1&format=PDF

*Inter-Service Steering Group*

An Inter-Service Steering Group on the 'digitalisation of visa procedures' initiative was set up to which the following services were invited: DG HOME, DG CNECT, DG DIGIT, DG EAC, EEAS, DG INTPA, DG JUST, DG GROW, DG MARE, DG MOVE, DG NEAR, DG RTD, DG TRADE. The meetings were chaired by the SG.

Four meetings took place on 24 November, 6 May, 3 June and 25 June. The first meeting[117] introduced the context and background of the initiative and presented the draft inception impact assessment as well as the terms of reference for the cost-benefit analysis. At the second meeting[118] the external contractor presented the interim report of the impact assessment study and DG HOME provided an update on the platform prototype. At the third meeting[119] the draft final report was presented to the inter-service group. At the fourth meeting[120], the draft impact assessment report was distributed and presented. After each meeting, the members of the Inter-Service Steering Group were given the opportunity to comment in writing on a draft version of the impact assessment report and its annexes. Furthermore several bilateral meetings have taken place with other Commission services in 2021 to address specific issues of interest, in particular with DG JUST and the Legal Service.

*Stakeholder meetings and consultations*

- 8 March: Meeting with Member States (Working Group of the Visa Committee on Digitalisation),
- 11 March: Meeting with travel and tourism industry,
- 23 March: Meeting with the EU Fundamental Rights Agency,
- 23 March: Meeting with Frontex,
- 23 March: Meeting with Europol,
- 1 June: Meeting with European Data Protection Supervisor.

For a precise breakdown of and details on the stakeholder consultation, see Annex 2.

*External contractor*

An external contractor (Deloitte) has assisted DG HOME by conducting a study including a detailed cost-benefit analysis of the different policy options to support the work on the Impact Assessment report. The call for the study was launched in December 2020, following which two substantive bids were evaluated, leading to the award decision at the end of January 2021.

The kick-off meeting for the study took place in February 2021, an inception report was delivered in March, an interim report in April, and a final report in June. The reports were designed to feed into the

[117] List participant DGs: DG HOME, DG CNECT, DG DIGIT, DG EAC, EEAS, DG INTPA, DG JUST, DG GROW, DG MOVE, DG NEAR, DG RTD, SG
[118] List participant DGs: DG HOME, DG CNECT, DG DIGIT, DG EAC, EEAS, DG JUST, DG GROW, DG MOVE, DG NEAR, DG RTD, SG
[119] List participant DGs: DG HOME, DG DIGIT, EEAS, DG INTPA, DG JUST, DG GROW, DG MOVE, DG NEAR, SG, Legal Service
[120] List participant DGs: DG EAC, DG GROW, DG HOME, DG INTPA, DG JUST, DG NEAR, DG RTD, SG, Legal Service

impact assessment work of the Commission. Several meetings were organised by the contractor to discuss the problem definition and to develop and evaluate the policy options.

## 4. Consultation of the Regulatory Scrutiny Board

| Feedback provided by the RSB | Modifications introduced |
|---|---|
| The report should be clearer on the objectives to be achieved. It should focus on the main problems, i.e. burdensome procedures and security (including cybersecurity) rather than tourism. The tourism related aspects seem uncertain and less obvious (see below), while the initiative presents a clear contribution to simplify the administrative procedures (in a wider context of digitalisation of public administrations) and to reinforce security. For the latter, the report should strengthen the evidence that the paper visa sticker – despite recent improvements – remains vulnerable to fraud. | The report has clarified and simplified both the general and specific objectives, accompanying them with measurable targets (see sections 4 and 9);<br><br>The report has provided additional evidence regarding the vulnerability of the visa sticker in the problem definition (section 2.1). |
| The sub-options on the architecture of the digital platform (now in annex) should be integrated into the policy options of the main report. For example, the report could present two versions of the mandatory EU visa application platform option, one with a centralised digital architecture and one with a hybrid architecture. The report should pay more attention to investment in national digital platforms already undertaken by Member States and show how a hybrid architecture could avoid possible sunk costs being wasted. The latter also presents advantages in terms of cybersecurity and protection of personal data | The description and analysis of the different sub-options have been incorporated in the body of the report (section 8.2). |
| The impact analysis should be strengthened with a transparent presentation of the assumptions particularly those underlying the (optimistic) travel projections. The sensitivity analysis should test the results against a weaker impact of the policy options on travel. Caveats should be clearly identified. | The tourism-related aspects have been nuanced throughout the report and the related projections and estimates have been modified, in particular by lowering the average number of visa applications per year from 20 to 17.8 million, and lowering the impact of the visa application platform on the increase in travel to the EU from 5% to 2% in options 3 and 4 and from 7% to 4% in option 5;<br><br>A sensitivity analysis with a stable number of travellers has also been included in the report. |
| The report should explain how the scores and the weights in the final score are determined when comparing options. The weight given to the | The weight of the environmental impacts has been modified in the comparison of policy options and moved under the effectiveness criterion, in |

| | |
|---|---|
| environmental impacts should not be reduced in the final score. Moreover, the environmental impact should be considered under the criterion of effectiveness rather than efficiency. | accordance with the feedback provided by the Board. |
| The report should clarify the data protection issues, in particular by integrating more information from the European Data Protection Supervisor and from the national data protection authorities from the annexes into the main report. | The views of the different stakeholders have been better reflected throughout the report, in particular those of the European Data Protection Supervisor and national data protection authorities. |

## 5. Evidence, sources and quality

*Sources*

In order to gather quantitative and qualitative evidence for the legislative proposal, the Impact Assessment relied on the following sources:

- a study assessing the feasibility and implications of options to digitalise visa processing, providing an initial body of evidence for this initiative, concluded in September 2019;
- a study conducted by an external contractor (Deloitte) assessing the various options related to the digitalisation of the visa process and to support the preparation of the impact assessment;
- a project with eu-LISA to develop and test a prototype of a future EU online visa application platform launched in September 2020, together with an analysis of the costs as well as technical and legal requirements of a future EU online application platform, as well as
- consultation of all relevant stakeholders, which took place over the course of Q1 and Q2 2021.

*Methodology*

The feasibility study assessed the costs and benefits associated with rolling out an EU online application platform, based on both quantitative and qualitative data. The cost-benefit analysis considers current costs associated with current national platforms and their future evolution, the costs where no Schengen online application platform is set up, and the costs involved in setting up a Schengen-wide online application platform. The analysis considers both a centralised system architecture and the hybrid system architecture. Additionally, the costs are estimated in three time period, the current context, the implementation period, and a future stable situation where implementation is complete. Additionally, the results are based on multiple questionnaires and interviews with stakeholders and Member States. Furthermore, studies conducted previously and public reports on Schengen (visa) operations were taken into account over the course of the cost-benefit analysis. Finally, as the online application process contains many similarities to the ETIAS application process, these similarities were leveraged in order to refine the estimations.

The study supporting the preparation of the impact assessment analysed the impact, costs & benefits of the different options to digitalise the visa process. In terms of tools, the study applied a combination of multi-criteria analysis, cost-benefits analysis and a Standard Cost Model, under the European Commission's Better Regulation Guidelines. The assessment of impacts covered a five-year period and considered the complete visa cycle - application, examination, decision, and verification. Data analysis started during the data collection phase, combining qualitative and quantitative methods. Following the analysis of all qualitative and quantitative data collected, using a combination of methodologies, the evidence was systematically crosschecked and triangulated, in order to ensure the internal coherence of the study. First, the impacts of the options were assessed, including costs and benefits. Then, the results of the impact assessment fed the comparison of the policy options via multi-criteria analysis. Finally, the preferred policy option was elaborated in more detail with sub-policy options.

## ANNEX 2 – TARGETED AND PUBLIC CONSULTATION

### 1. Stakeholder consultation

As outlined in the **consultation strategy**, a public consultation and targeted consultations were carried out in March 2021, in addition to a study on the feasibility and implications of options to digitalise visa processing and several other activities previously carried out in preparation for the impact assessment[121].

The main stakeholders consulted include:

- third country nationals, in particular those with experience of applying for a Schengen visa;
- member State authorities in charge of visa issuing (Ministries of Foreign Affairs or national migration authorities) and in charge of border controls and law enforcement checks (Ministries of Interior);
- stakeholders in the travel and tourism industry;
- relevant EU agencies: Europol, Frontex – for border management/law enforcement aspects, eu-LISA – for technical and data security aspects;
- fundamental rights stakeholders: FRA, in particular for digital accessibility;
- data protection stakeholders (European Data Protection Supervisor, national data protection authorities);
- wider public: citizens or NGOs with an interest in the initiative (through the public consultation).

The aim of the targeted and public consultations was to obtain the views of citizens and stakeholders on the envisaged initiative, in particular on the usefulness of an online application process and EU/national application platforms, as well as the replacement of a visa sticker with a digital visa. More specifically, the consultations gathered the views of stakeholders on the impact of different policy options, as well as on the legal, economic and practical aspects of the possible digitalisation of the visa procedures. This allowed stakeholders to contribute to the impact assessment, and in particular, to the development of policy options addressing the problems identified.

For the targeted consultations, Member States, the representatives of the tourism and travel industry and the data protection stakeholders were invited to participate in meetings where they were given the opportunity to present their views to the Commission services. Questionnaires were distributed to gather their views in a structured manner. In addition, participants had the opportunity to submit written position papers.

[121] (i) A study to assess the various options related to the digitalisation of the visa process and to support the preparation of an impact assessment; (ii) A project with eu-LISA to develop a prototype of the EU online visa application portal; (iii) A project on digital visas under the Kaliningrad Special Transit Scheme managed by Lithuania.

Interviews (conducted by the contractor and/or DG HOME) took place, to complement the available information with the following stakeholders:

- relevant EU agencies: Europol, Frontex – for border management/law enforcement aspects, eu-LISA – for data security aspects;
- data protection stakeholders, which includes the European Data Protection Supervisor;
- fundamental rights stakeholders, in particular for digital accessibility.

A public consultation was conducted through an internet-based survey between March and May 2021, targeting visa applicants and citizens or organisations who wish to give their input on the modernisation of the EU's visa policy. Similarly, organisations mostly active in the travel and tourism and transportation sectors had the opportunity to share their views through the public consultation. Respondents were asked in particular to provide input on economic impacts (costs/savings, facilitations), social impacts, impacts on fundamental rights (notably on accessibility issues) and general views on the expected simplification impact of digitalisation.

The table below provides an overview of the different stakeholders consulted and data-collection activities conducted.

***Table 14**: Overview of consultation activities*

| Activity | Status |
|---|---|
| *Interviews with EU bodies and agencies* | eu-LISA |
| | European Border and Coast Guard Agency (EBCGA) |
| | Europol |
| | Fundamental Rights Agency (FRA) |
| | DG JUST Unit C.3 |
| | European Data Protection Supervisor (EDPS) |
| *Public Consultation* | 515 responses received. Closed on 03/06/2021 |
| *Interviews with national authorities* | Conducted: 19 |
| *Member States survey* | Responses received from: all Member States , except Liechtenstein |
| *Consultation with data protection authorities* | Responses received from: 10 Member States |

| | |
|---|---|
| *Consultation with tourism and travel operators* | CER (Community of European Railway and Infrastructure Companies), CLIA Europe (Cruise Lines International Association), ECSA (European Community Ship owners' Associations), ETOA (European Tourism Association), IRU (International Road Transport Union), WTTC (World Travel and Tourism Council), HOTREC (Association of Hotels, Restaurants, Pubs and Cafes in Europe), PEARLE (Live Performance Europe). |

**1. Feedback on the Inception Impact Assessment**

A call for feedback, seeking views from any interested stakeholders, on the basis of the Inception Impact Assessment, was open for response from 4 December 2020 to 1 January 2021. This public consultation received six replies from the following stakeholders:

- companies/business organisation (3 replies);
- business associations (2 replies) and
- non-EU citizens (1 reply).

All the responses have been published in full online.

All the responding stakeholders expressed wide support for the initiative, underlining the expected benefits and conveniences deriving from a modern, user-friendly digital solution, which is expected to facilitate administrative procedures. According to the responding stakeholders in the business sector, facilitated administrative procedures will smoothen business travel in general, which is underlined as a particular benefit for small and medium companies, helping them to increase competitiveness.

The responding business associations and companies/business organisations underlined the need to ensure data security, and to envisage a transitional period to ensure a smooth transition from paper-based to digital solutions, as well as a need for fall-back solutions in case of technical issues.

The responding business associations also underlined the need for the existing industry facilitations to be retained and possibly replicated in the new digital set-up.

The Inception Impact Assessment consultation is available in Have your Say[122]. All contributions received are publicly available.

**2. Targeted consultation of Member States**

[122] https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12758-Entering-the-EU-online-visa-application-process-and-digital-visa.

All Member States support an option which provides for a **digital visa**. They would also support the extension of this digitalisation to long-stay visas[123]. This makes sense as the format of the visa sticker[124] is regulated at EU level and concerns both short-stay visas and long-stay visas[125].

Regarding the **EU online application platform**, 14 Member States would favour the use of an EU application platform on a voluntary basis (O3) whereas 10 would be in favour of mandatory use of the platform with a transition period (O4). Two Member States would support mandatory use without transition period (O5). Many Member States expressed security concerns on option 5.

These answers show a **real interest for an EU online application platform**, mandatory or not. At this stage, the preference for an EU online application platform on a voluntary basis seems logical as the EU platform does not exist yet (the Commission is working on a prototype in collaboration with eu-LISA). A certain number of Member States have already partly digitalised their application procedure[126]. Other Member States are developing their own platform and would prefer to see the EU platform in operation before deciding to use it.

Regarding **the use of the EU platform for long-stay visas applications,** 20 Member States would favour this synergy, but half of them would prefer to wait before integrating long-stay visas in the EU platform. Legislation and application procedures for long-stay visas vary greatly from one Member State to another whereas short-stay visas are harmonised through EU Law.

The information gathered in the context of the consultation with and feedback from Member States has been taken into account in the analysis of the different policy options, in particular as regards Member States' overall preference for O3 and O4. Member States concerns regarding security were confirmed by the results of the impact assessment and were taken into consideration when discarding O5.

A detailed analysis of Member States' responses is available Paragraph 2 of this Annex.

**3. Targeted consultation of EU Agencies**

Targeted meetings were organised with the Fundamental Rights Agency, Europol and eu-LISA, relating in particular to data protection, fundamental rights, interoperability and security.

The Fundamental Rights Agency emphasised the need to adhere to the GDPR principles of 'purpose limitation' and 'data minimisation' when collecting personal data, the importance of clearly defining which authorities have access to which data and the need for the digital application process to be accessible for people with disabilities.

Europol views enhanced security as an added value of digitalising the visa procedure as visa applicants' data is systematically cross-checked against other EU systems when processing applications.

[123] Long-stay visas concern stays between 90 days and one year (studies, work, etc.). They are issued by Member States on the basis of national or EU law. Their format is regulated at EU level through the visa sticker regulation.
[124] Council Regulation (EC) No 1683/95 of 29 May 1995 laying down a uniform format for visas (Official Journal L 164, 14/07/1995 p. 1-4).
[125] Regulation (EU) No 265/2010 of the European Parliament and of the Council of 25 March 2010 amending the Convention Implementing the Schengen Agreement and Regulation (EC) No 562/2006 as regards movement of persons with a long-stay visa (OJ L 85, 31.3.2010, p. 1–4).
[126] 19 Schengen Member States have digitalised parts of the application procedure to a greater or lesser extent.

Both the Fundamental Rights Agency and Europol are of the opinion that enrolment of biometrics in a non-controlled environment (O5) poses risks with regard to identity fraud and data quality. They consider digital visas overall as a good development and a signed 2D barcode as a safe means (and offline solution) with which a third-country national can prove possessing a valid visa.

eu-LISA estimated that from the side of the technical development and implementation there should not be visible difference in costs between option 4 and 5, as only few additional steps would be added to the VIS workflow. However, the remote collection of biometrics with applicant's device might affect VIS operation, as necessary quality of biometrics cannot be assured.

**4. Targeted consultation of data protection stakeholders**

*European Data Protection Supervisor*

A consultation meeting with the **European Data Protection Supervisor (EDPS)** took place on 1 June 2021.

The EDPS explained that the **higher degree of digitalisation of the options, the greater the risks to data protection**. The EDPS underlined that the paper-based approach entails some data protection risks, but that – all things being equal – a digital process is likely to bring along new challenges in terms of data protection and entail higher risks compared to the paper-based process. This is because paper-based documentation is usually located at the premises of a consulate and thus one needs to be at the location to be able to access the documents and cause data breaches. On the other hand, the digital documentation stored online may be accessible from anywhere.

In particular, as regards the **application process under O5**, the EDPS noted that the collection of biometrics though an online application raises data protection concerns but also many issues beyond data protection (i.e. data quality, etc.). This merits special attention as biometric data are considered as sensitive under the GDPR.

As regards the **digital application platform**, the EDPS mentioned the concern that this could – even temporally – store more data than in the VIS because of the collection of supporting documents.

As regards the **options for storage of data,** either in a centralised storage facility or at national level, the EDPS mentioned that a downside of a centralised database is that there is a single point of failure and attacks. Therefore, such a solution is more prone to technical errors and to security breach. The after-life error is also higher. However, from a data protection perspective, the fact that the data are stored in a centralised storage facility ("centralised" option) or in national storage facilities with temporary central storage ("hybrid" option) is not a deal breaker. In other words, although in principle the former option entails higher risks because all data are stored in the same location, it cannot be concluded that the latter option is safer. A detailed analysis needs to be carried out on how the solution is implemented. In the case of centralised storage or a hybrid option, new measures should be identified to mitigate privacy risks.

The EDPS advised to carry out two **Data Protection Impact Assessments** (DPIA), one before adopting the legislation, and one during the implementation phase. The second DPIA should be carried out once the technical details and alternatives to implement the initiative are defined, so that a more detailed assessment is possible.

The Commission took the feedback of the EDPS in close consideration, including as regards the concerns raised by the online collection of biometrics under **O5**. With regard to the digital application platform, although additional data may be stored temporarily, no additional data would be requested from visa applicants other than the ones currently collected. The Commission explained that there will not be enough time to carry out a fully-fledged Impact Assessment on Data Protection before proposing the legislation in Q4 2021.

*National data protection authorities*

On 8 April 2021 DG HOME requested the input of Member States Data Protection authorities on the data protection issues related to visa digitalisation.

The following (10) Member States submitted replies: Belgium, Bulgaria, Switzerland, Croatia, Czech Republic, Greece, Lithuania, Malta, the Netherlands and Slovakia.

As regards the **aspects to be further analysed in view of the envisaged changes in data processing,** the responses largely emphasised adherence to the **principles** of 'purpose limitation' and 'data minimisation'. In particular, respondents mentioned the need to:

- clarify which data have to be processed, by whom (which authority/entity/person), for how long and why, as well as defining the ownership of the stored data and who is in charge of visa processing, and ensuring the supervision of the processing activity;
- ensure that data access is configured in a way that only the competent authorities can access data that is strictly necessary for the purpose of the digitalised visa application/issuance;
- ensure that the data are deleted as soon as they are no longer needed;
- explore the possible links between the changes resulting from the digitalisation of visa procedures and the existing central Visa Information System – National Visa Information System (C.VIS-N.VIS) set-up and Schengen Evaluation mechanism; the rules establishing a framework for interoperability between EU information systems in the field of borders and visa[127] and in the field of police and judicial cooperation, asylum and migration[128], other IT systems, bodies, offices and agencies[129], and the new Pact on Migration and Asylum.

[127] Regulation (EU) 2019/817 of the European Parliament and of the Council of 20 May 2019 on establishing a framework for interoperability between EU information systems in the field of borders and visa and amending Regulations (EC) No 767/2008, (EU) 2016/399, (EU) 2017/2226, (EU) 2018/1240, (EU) 2018/1726 and (EU) 2018/1861 of the European Parliament and of the Council and Council Decisions 2004/512/EC and 2008/633/JHA (OJ L 135, 22.5.2019, p. 27–84).
[128] Regulation (EU) 2019/818 of the European Parliament and of the Council of 20 May 2019 on establishing a framework for interoperability between EU information systems in the field of police and judicial cooperation, asylum and migration and amending Regulations (EU) 2018/1726, (EU) 2018/1862 and (EU) 2019/816 (OJ L 135, 22.5.2019, p. 85–135).
[129] For example SIS, EES, ETIAS, in the fields of Border, Asylum and Migration, SIS, EPPO, Eurojust, ECRIS-TCN in the field of Police and Justice Cooperation.

Some of the main **recommendations for the design of the initiative** include:

- Independently from the option chosen, ensure that the **data security** and **confidentiality** are guaranteed, especially during the following steps: when sending data via e-mail; if and when the applicant submits his/her fingerprints, facial image and copy of travel document using a smartphone application. This is particularly important when handling sensitive data, e.g. health data. Data breaches due to unsecure payment methods in third countries were also mentioned in this regard.
- Ensure that the **data cannot be forged,** in particular when the applicant submits his/her fingerprints and facial image during the application process and when the visa holder needs to prove being in possession of a visa to private entities in the Schengen territory (e.g. hotels, banks, etc.).
- For reasons of **security**, two-factor authentication should be required for the digital visa, or notification thereof, to prevent for example the applicant's password being hacked.
- Follow the principle of **transparency and accountability**, ensure that all roles – data controllers, processors, and joint-controllers are well defined including those that would store personal information along with eu-LISA.
- Ensure that the **rights and freedoms** of visa applicants are protected, when creating a new database (e.g. the right to have access to personal data, to have a copy of the data, to have data modified or deleted, etc..
- Ensure **consent** of the applicant at all stages, e.g. including consent for the re-use of his/her personal data for future applications. In this regard, sufficient information has to be given to the data subject for **fair and lawful processing,** in line with the EDPB guidelines.
- With regard to **supervision**, envisage audit logs and audit possibilities for the central component and/or the hybrid model (central and local storage).
- As regards **accessibility,** the possibility that a visa applicant might not be in possession of a smart phone or an email account must be considered, and alternative possibilities to apply for a visa should be envisaged to that effect.

As regards the preferred **policy options**, a preference was expressed for **O3** and **O4**, and in one case for **O5**. One Member State mentioned that all the options and possibilities can be implemented in accordance with data protection principles, although some concerns were raised as regards the data protection and security implications of **O5**. It was also mentioned that in general, the more similarities in the system in Member States, the more clarity for the data subjects, hence support was expressed for an EU visa application platform.

As regards the **preferred option for the system architecture**, from a data protection perspective, six Member States (Switzerland, Croatia, Czech Republic, Greece, Lithuania and the Netherlands) expressed a preference for a **hybrid option** with decentralised storage of data, which is considered better in terms of data minimisation and security by the data protection authorities.

One Member State (Malta) expressed a preference for a **centralised system** hosted at EU level, which is considered to limit the risks of data inconsistency and inaccuracy, especially where biometric information is concerned.

One Member State (Lithuania) however noted that a hybrid option would be preferable when the system is set up properly and in strict accordance with data protection safeguards and principles. If this should not be the case (e.g. due to lack of means), then a centralised system may be preferable, as both options could be implemented in accordance to data protection principles.

Finally, one Member State (Slovakia) expressed **support for both options** and two Member States (Bulgaria, Belgium) mentioned that both **options for system architecture should be further examined.**

With regard to the policy options and options for system architecture, it should be noted that not all Member States expressed an explicit preference.

**5. Targeted consultation of travel and tourism industry stakeholders**

The aim of the consultation was to gather the views of representatives of the travel and tourism industry on the visa digitalisation initiative.

Representatives from the following organisations participated in the consultation meeting: CER (Community of European Railway and Infrastructure Companies), CLIA Europe (Cruise Lines International Association), ECSA (European Community Ship owners' Associations), ETOA (European Tourism Association), IRU (International Road Transport Union), WTTC (World Travel & Tourism Council), HOTREC (Association of Hotels, Restaurants, Pubs and Cafes in Europe), PEARLE (Live Performance Europe).

Representatives of the travel and tourism industry consulted by DG HOME **supported unanimously O4** (digital visa + mandatory EU visa application platform with a transition period). They highlighted that this would facilitate the application procedure for visa applicants, as well as the positive impact on voyages to the EU and the increased attractiveness of the EU as a travel destination. They underlined the need for the EU to offer a seamless travel experience equivalent to the one proposed by countries like Australia, in particular towards travellers from Asian countries subject to visa requirements. Whilst also showing an interest in O5, they recognised it could pose security challenges.

The information gathered in the context of the consultation with and feedback from travel and tourism industry has been taken into account in the analysis of the different policy options, in particular as regards their strong preference for O4. The recognition of the security challenges posed by O5 also confirmed the results of the impact assessment and were taken into consideration when discarding O5.

**6. Public consultation**

An open public consultation was conducted through an internet-based survey between March and June 2021. The public consultation targeted visa applicants and citizens or organisations who wish to give their input on the modernisation of the EU's visa policy.

The public consultation was accessible via the Have Your Say portal and DG HOME's public consultation webpage. Additionally, efforts were made to promote the public consultation through Member States' consulates and external service providers. To increase its reach and accessibility, the questionnaire was made available in all official languages and, if possible, some key non-EU languages (e.g. Russian, Arabic, Chinese, Turkish). The public consultation met the 12-weeks minimum mandatory requirement.

*Methodology*

As regards the methodology adopted, since the impact assessment is mainly targeted at third-country nationals who require a visa, the analysis primarily focuses on their replies, especially regarding questions related to their experience with previous visa applications. The opinions of EU citizens and other profiles are taken into account in the more general questions, also because EU citizens may have a particular interest in the digitalisation of the visa process or in some cases, as indicated in further information provided by respondents, EU citizens share views on the process on behalf of family members who are third-country nationals.

It should be noted, as a disclaimer, that the questions that were presented to the respondents depended on the profile they had indicated (as depicted in Annex 2). This explains why some questions have a lower amount of responses. Additionally, the respondents did not have to complete every question to submit a valid form. This explains why the response rate sometimes differs.

*The respondents*

As of 3 June 2021, the Public Consultation had a total of 515 respondents out of which 341 were non-EU citizens and 98 EU citizens. The remaining respondents consisted of business associations, academic/research institutions, non-governmental organisations and companies or business organisations.

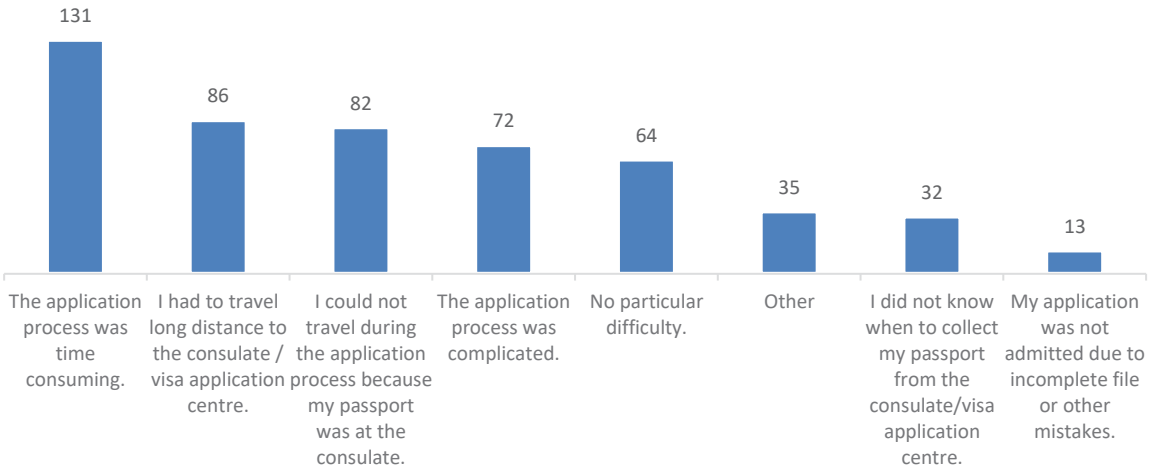
55% of Third-country nationals fall within the age category of 25 to 39. 35% of third-country nationals are between 40 and 60 years old. 5% is younger than 24. The final age category, above 60, is represented by 5%. The analysis below therefore mainly reflects the point of view of the people below 60.

As regards the respondents' **main reason for travel to the EU**, 59% of respondents indicated tourism; the second most common reason for travelling to the Schengen area is to visit family or friends (16%).

As regards the **difficulties currently faced** by the respondents **when applying for a Schengen visa**:

- 52% of respondents pointed out that the process was time consuming;
- 34% of respondents saw the long distance they have to travel to the consulate/ VAC as an issue;

- 33% of respondents thought it was annoying to leave their passport at the consulate;
- 29% of respondents said the application process was complicated;
- 25% of respondents have not encountered any particular difficulty;
- 14% of respondents thought there were other difficulties;
- 13% of respondents did not know exactly when to collect their passport from the consulate/ VAC;
- 5% of respondents said their application was not admitted due to incomplete files or other mistakes.

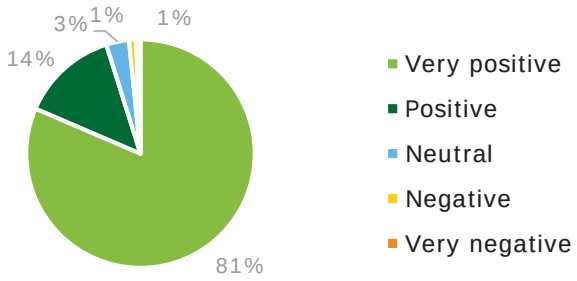



- 95% find receiving email messages easy and 4% are neutral;
- 88% think online/ mobile payment is easy. 8% are neutral and 5% of the respondents find this difficult;
- 82% believe that scanning and uploading documents to an online website or portal is easy.14% are neutral and 4% think this is difficult;
- 84% think it is easy to scan their travel document with a mobile device. 10% are neutral and 6% find this difficult;
- 76% find using support tools such as online tutorials or chatbots easy. 19% are neutral and 2% find this difficult.

*Main findings*

The results of the public consultation shows **very strong support for the digitalisation process,** both regarding the digital visa and the possibility to apply online.

**81% of the respondents are very positive about the initiative** and 14% are positive about digitalising the visa procedure and making it less paper-based. Only 2% have a negative opinion on the digitalisation with the fact of losing personal contact as a main argument and 3% are neutral.




Additionally, 86% of respondents agree with the statement that digitalisation would increase family visits / business / cultural or scientific exchanges; 90% of respondents agree that digitalisation would contribute to a positive image of the EU or Schengen Area; 83% agree that digital visa procedures would increase the transparency of the visa process, and 67% agree that digitalising the visa procedure would increase the security of the Schengen area.

The benefits of the digital visa are summarised in the table below.

| | Do you think… | | | | |
|---|---|---|---|---|---|
| | Digital visa procedures would promote travel and tourism to the EU? | Digital visa procedures would promote family visits / business / cultural or scientific exchanges | Digital visa procedures would contribute to a positive image of the EU or Schengen Area | Digital visa procedures would lead to greater transparency in the Schengen visa process | Digital visa procedures would promote the security of the Schengen Area |
| Strongly agree | 60% | 62% | 66% | 58% | 44% |
| Agree | 26% | 24% | 24% | 25% | 23% |
| Neutral | 8% | 8% | 5% | 11% | 25% |
| Disagree | 1% | 1% | 1% | 2% | 3% |
| Strongly disagree | 4% | 4% | 4% | 4% | 5% |

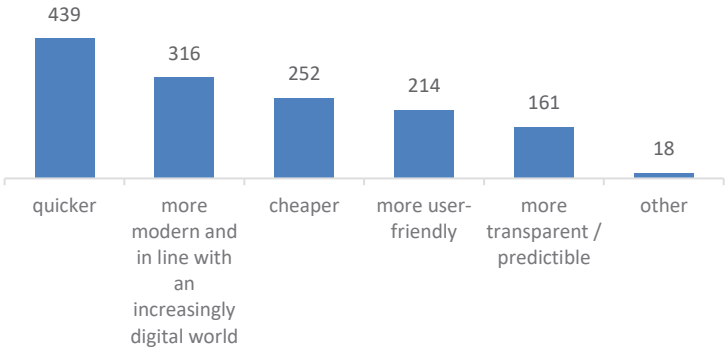
Questions related to the online application portal

As regards the **online application portal,** 96% of respondents believe that the introduction of an online application procedure would facilitate the process of applying for a Schengen visa**.** 2% of respondents do not agree with this statement and 2% are neutral.

As regards the main **benefits of the online application procedures**: 439 (85%) respondents indicated that the largest benefit of introducing an online application procedure is the fact that the entire procedure would be quicker. This is in line with the two main burdens of the current process that were both characterised by the lengthiness of the process.

Additional benefits mentioned by respondents include: making the online application procedure more in line with the digital age (61%); the online procedure would be cheaper than the current situation which often requires one or more visits to the consulate/VAC (49%). Additional arguments for a more digital solution are the fact that it would be more user-friendly for 214 people (42%) and create a more transparent and predictable application process for 161 (31%) people. Other benefits that have been highlighted by 18 respondents (4%) are: the ability to travel during the visa process because you would not have to leave your passport at the consulate and; the ecological aspect that the digitalisation entails.

The figure below shows what the main benefits of the online application procedure would be according to the respondents.




As regards the importance for repeat applicants of not having to visit the consulate/VAC, 89% of respondents find it important that they would not have to visit the consulate or VAC in-between applications.

Although the majority of the respondents have stated that they would benefit from a digital visa procedure, 32% still indicate that they see some obstacles or drawbacks. 68% do not see any obstacles or drawbacks.

Respondents mentioned the following **obstacles or drawbacks of the digital application procedure**: not having the possibility to ask questions as a possible drawback to the digital application service (58%), applicants' lack of computer literacy (43%); inadequate or no access to internet (31%); scanning and uploading documents (33%); concerns about the privacy and data security of the online process (30%); unavailability of necessary equipment (e.g. computer or mobile phone) to access the application portal (23%). 15% of respondents believe that there are other obstacles/drawbacks to a digital application procedure. The main other obstacles/drawbacks that were brought up were concerns about fraud being more easy with a digital application procedure and the lack of standardisation of required documents which could lead to incomplete applications.

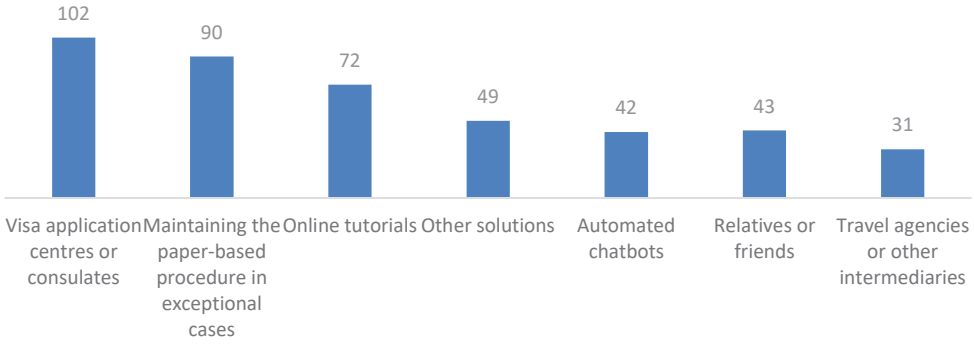
When asked about the **form of support that applicants would prefer to overcome these obstacles/drawbacks**, a large amount of respondents indicates they still would like to receive support through real life guidance:

- 63% of respondents would still like to go to the consulate/VAC to get help with filling out their applications;
- 56% would also like to maintain the paper-based procedure in exceptional cases.

The online solutions that could be offered on the platform also prove to be quite popular:

- 44% of respondents see online tutorials as the preferred form of support;
- 26% of respondents would like to get support through automated chatbots.

Asking help from relatives or friends (27%) or travel agencies or other intermediaries (19%), have also been indicated by some respondents. A human/physical contact point therefore still seems to be important despite the desire for digitalisation.




As regards the preferences of the respondents in terms of **where the Schengen visa should preferably be submitted,** 44% of respondents are in favour of solely submitting their Schengen visa application on a single EU digital visa portal. 12% think the best solution would be a national portal, managed by each EU Member State separately. 44% do not have a clear preference and suggest that both options would be fine.

82 % agree that it is important to have the possibility to apply online for both the Schengen visa and long-stay visa. 13% of the respondents are neutral and 5% do not find it important.

Questions related to the digital visa

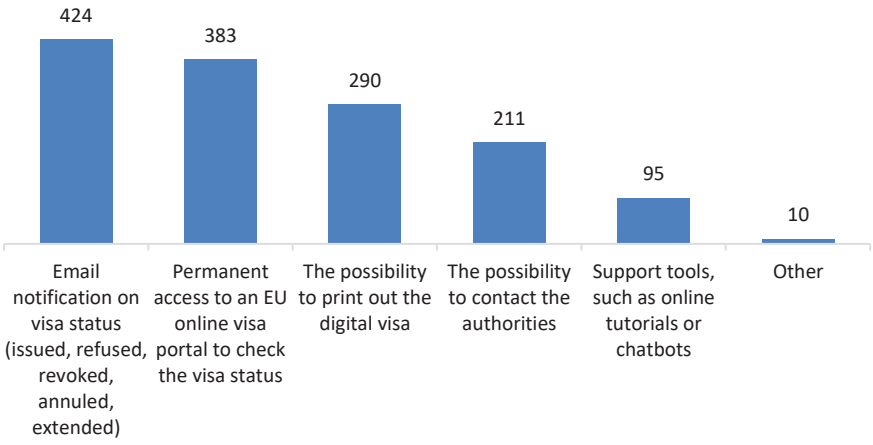
As regards the introduction of the digital visa, this is **generally seen as a very positive development**. The main advantages mentioned are the following:

- 92% of respondents believe that a digital visa would facilitate the Schengen visa application procedure and travelling to the EU Schengen area for visa holders.
- 83% of respondents find it an important advantage that they would not need to leave their passport at the consulate to get the visa sticker affiliated to their passport. This would mean that applicants can travel during their application process.
- 83% of respondents find it an important advantage that they do not need to retrieve their passport at the consulate or VAC at the end of the visa application procedure. This would save the applicants transportation or courier costs to collect or get their passport delivered.

- 91% of respondents find the advantage of easily checking the status of their visa application through their mobile device very important. 5% are neutral about this advantage and 4% do not find this important.
- 93% of respondents finds it an important advantage that their visa could remain valid even if the passport would get lost or stolen as it would be transferred to a new passport. 5% are neutral and 2% do not find this advantage important.
- 88% of respondents find it an advantage that there would be smoother border control checks. 10% are neutral and 2% do not find this an important advantage.

Even though most respondents clearly see a lot of advantages to the digital visa, **76% still see some possible obstacles/drawbacks**. 24% do not see any particular obstacle or drawback. The main obstacle identified by 55% of respondents is the limited access to the visa for other parties (carriers, hotels etc.). Additional obstacles include bad access or no access to the internet (44%), concerns about the security of personal data and privacy (40%), lack of necessary equipment to access the digital visa (38%) and lack of computer literacy (33%).

As regards the **features of the digital visa which respondents would find important**, 83% think email notifications on the visa status should be included, 75% believe there should be a permanent access to the EU online visa portal to check the status of their visa; 57% find the possibility to print out their digital visa an important feature; 41% would like to have the possibility to contacts authorities; 19% think support tools such as online tutorials or chatbots are an important feature and; 2% have indicated other features such as having the option still to have a paper sticker.

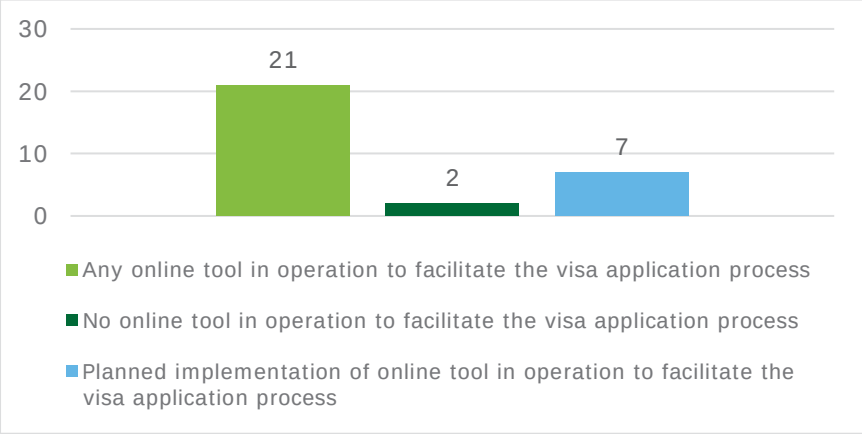


## 2. Analysis of the consultation with the Member States

Within the context of the Impact assessment, Member States were consulted in order to collect their opinion on a number of topics, including questions pertaining to the existing national visa application processes, the use of online tools in order to facilitate the visa application procedure and future outlook. This Annex represents a summary of the responses related to the topics mentioned above. 30 Member States replied to the questionnaire, namely: Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Iceland, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden and Switzerland.

### National digital application services

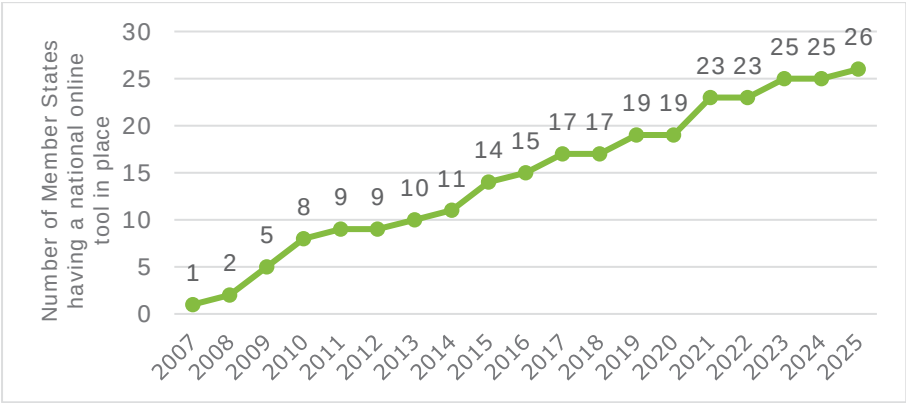
**Figure 5**: Question 7: Implementation of national online tools (n=30)




28 Member States explained that they either have some kind of national online visa application tool in place, or are planning to implement one in the near future. Two Member States[130] expressed that they do not have or plan to implement an online tool to facilitate the visa application process. It should be noted that the stage of digitalisation varies greatly between Member States, as well as the type of national online visa application tool and associated features of the tool in place.

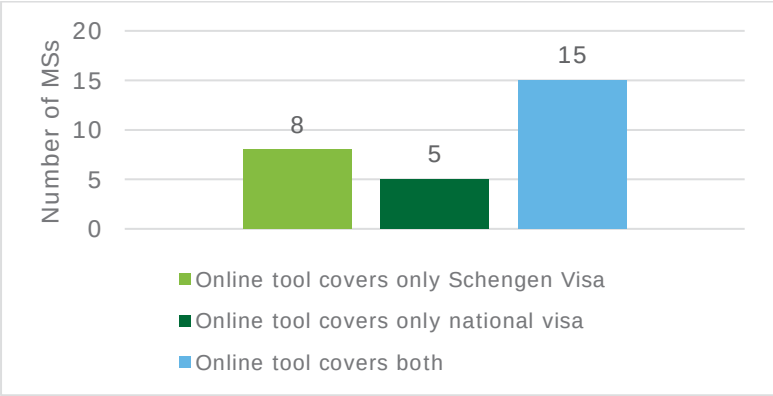
**Figure 6**: Question 8: Timeline of implementation national application tools (n=26)

[130] Luxembourg and Malta.




The graphic above portrays the evolution of the first implementation of national application platforms within the Member States. The timeline varies between Member States, with the first Member State implementing an online tool in 2007, whilst others are planning to implement their first online tool to facilitate the visa application process in 2025. Besides the two Member States without a national application tool in place or plans to do so, the Czech Republic and Slovakia did not indicate when their national application tool was implemented.

**Figure 7**: Question 9: Visa covered by national online tools (n=28)




When asked about the type of visa covered by their national online tool, eight Member States replied that only Schengen visa are or will be included in their national online tool, whilst five Member States indicated that their national online tool only covers national visa. 15 Member States stated that their national online tool covers or will cover both types of visa. Three Member States also include different visas within their national online platform[131].

Regarding the technical updates related to the online tools implemented by Member States, 16 Member States indicated that they updated their existing national platform in some shape or form in the last couple of years, including small technical updates and the implementation of completely new features

[131] Denmark issues visa for Greenland and the Faroe Islands, whilst the Netherlands offers visa for the Caribbean. Further, the Norwegian online tool covers applications for residence and work permits, citizenship, etc. as well.

such as an online payment option[132] and the possibility to upload supporting documents for applicants applying for long stay student visas[133].

Member States were also consulted regarding the development, maintenance and support cycles related to the online tool, including any associated contracts with external partners. In parallel with the aforementioned diversity in implementation date and updating schedule, the development, maintenance and support cycles are very different between Member States with an online tool in place, as well as any contracts with external partners. Four Member States also indicated that their online tool is an in-house solution, encompassing its development, maintenance and support, whilst seven Member States did not provide an answer to the question. Below, the number of Member States for which the contract ends in a specific year are depicted[134]:

***Table 15**: Question 11: Overview of the year in which maintenance contracts of Member States with external IT contractors will end:*

| | 2021 | 2022 | 2023 | 2024 | 2025 | 2026 | Other |
|---|---|---|---|---|---|---|---|
| Number of Member States | 4 | 3 | 2 | 3 | 0 | 2 | 1[135] |

On average, the respondents with an existing national online tool in place indicated that 72.7% of the worldwide visa applications are submitted online, including Schengen visa, long-stay visa and other issued visa by the consulted Member States. It should be noted that this does not necessarily mean that the entire visa process was conducted online but that in those cases some online tool was used.

Besides the listed features in the table below, six Member States indicated that their online national tool also included other options, including a feature to monitor the status of the submitted visa application, FAQ and News sections and the possibility to verify the supporting documents online at the stage of the appointment registration.

[132] Switzerland.
[133] France.
[134] The remaining Member States that submitted a reply to this question did indicate whether they used external contractors or developed their national tool in-house.
[135] 2033

***Table 16**: Question 12: Overview of included features in national online tools*

| | Wizard guiding the applicant on the type of visa, visa fee, documents needed etc. | Information about general rules for lodging an application | Indication on the next available appointment before starting application process | Creation of personal account | Error detection / data quality check (e.g. alphanumeric) | Filling in the application form | Application fill-in and print out option (no direct link with the national VIS) |
|---|---|---|---|---|---|---|---|
| Member States with the feature included in their national online tool | 15 | 21 | 5 | 15 | 22 | 26 | 12 |
| | **Data upload to the national VIS (direct link with the national VIS)** | **Upload of supporting documents** | **Lists of supporting documents (per third country / travel purpose)** | **Online payment of the visa fee** | **Appointment management** | **Signing the application** | **ESP access to correct or complete/upload data** |
| Member States with the feature included in their national online tool | 15 | 9 | 9 | 7 | 14 | 4 (Tick box) | 12 |

The following table gives an overview of the technologically advanced functionalities and features that are included or considered to be included in the online application platforms of the consulted Member States. Six Member States did not provide a detailed overview in this regard.

***Table 17**: Question 13: Overview of technologically advanced features in national online tools*

| | Chatbot to support preparation and application process (from start to finish) | Providing facial image with a webcam / smartphone | Identification with live face recognition using webcam / smartphone | Scan of the travel document to extract relevant data | Passport chip contents authentication using a smartphone | Photo morphing detection (for consulate) |
|---|---|---|---|---|---|---|
| Member States with the feature included in their national online tool | 3 | 0 | 0 | 1 | 0 | 1 |
| Member States that will include the feature in their national online tool | 6 | 5 | 3 | 9 | 2 | 3 |

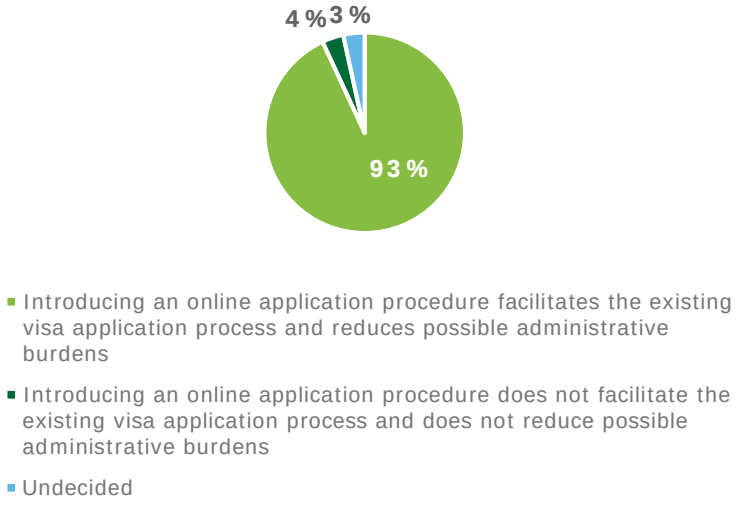
| | | | | | | |
|---|---|---|---|---|---|---|
| Member States that do not consider this feature | 15 | 18 | 20 | 14 | 21 | 19 |
| Number of Member States that did not indicate anything for the feature in question | 0 | 1 | 1 | 0 | 1 | 1 |

| | **Communication with the applicant through the online tool** | **Application status notification or verification** | **Statistics and reports on the submitted applications (for consulates)** | **Smartphone application** | **Accessibility functionalities for people with disabilities** | **Other features** |
|---|---|---|---|---|---|---|
| Member States with the feature included in their national online tool | 4 | 9 | 10 | 5 | 3 | 2[136] |
| Member States that will include the feature in their national online tool | 13 | 12 | 9 | 9 | 8 | 0 |
| Member States that do not consider this feature | 7 | 3 | 5 | 10 | 13 | 22 |
| Member States that did not indicate anything for the feature in question | 0 | 0 | 0 | 0 | 0 | 0 |

[136] Croatia: "Further development includes the calendar appointment system. Also, along with current six (6), additional language versions will be added." Sweden: "Automatic control via sticker/application number in the e-application whether the applicants biometrics can be re-used"

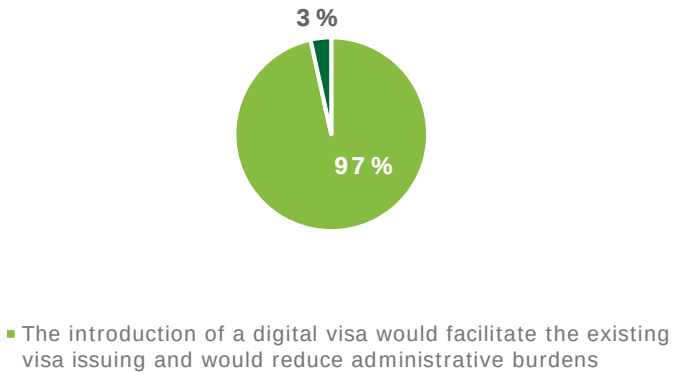
## Potential digitalisation of the application process

**Figure 8**: Question 15: Assessment of the introduction of an online application procedure (n=29)




93% of the responding Member States assessed that the implementation of an online application procedure would facilitate the existing (Schengen) visa application process, and believe that it would reduce the possible administrative burdens of the central authorities and consulates. 4% believe this is not the case, whilst 3% remain undecided.

**Figure 9**: Question 16: Assessment of the implementation of a digital visa (n=29)




97% of the respondents believe that the implementation of a digital visa which would replace the existing visa sticker would facilitate the existing procedure regarding the issuing of (Schengen) visa, as well as reduce possible administrative burdens for the central authorities and consulates.

Regarding the assessment of the five policy option by Member States, all consulted Member States are in favour of digitalising the visa application procedure, as well as the implementation of a digital visa. No Member State was in favour of Option 1. Four Member States supported the implementation of the policy Option 2, with three of these Member States also supported policy options 3 and/or 4. Three Member States indicated that they would prefer the fifth policy option, although some Member States referred to the unrealistic nature of the policy option at this point in time.

All other Member States supported policy options 3 and 4 as the most realistic and preferred approaches to digitalise the visa application process and implement a digital visa, or at least included the third or fourth policy option within their answer. The returning motivation point vis-à-vis the third option entails the voluntary nature of the EU online platform, which allows the use of national tools and more flexibility for Member States. For the fourth policy option, reasons raised by Member States include a harmonised and unified approach across Member States and their consulates, countering the practice of visa shopping and the inclusion of a transitional period which would smooth the transition from national tools to the EU-wide platform.

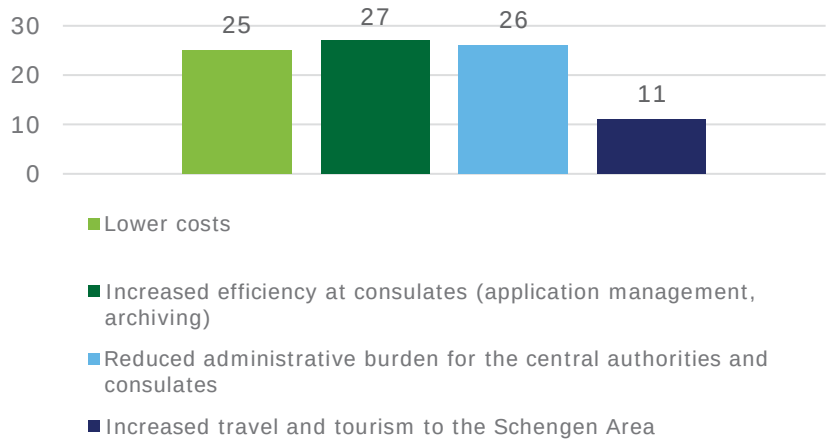
In the context of the general preference of the respondents for policy options 3 and 4, some Member States express that they prefer policy option 3 because of the voluntary basis of enrolment, but that an effective and adequate EU-wide platform would encourage them and other Member States to join the initiative, eventually resulting in the outcome of policy option 4.

The following table lists the overview of the consulted Member States and their preferred policy option(s).

***Table 18**: Question 17: Preference of the consulted Member States in regard to the policy options*

| Member State | Preferred option | Member State | Preferred option |
|---|---|---|---|
| Austria | Option 2 | Italy | Under evaluation |
| Belgium | Options 3 and 4 | Latvia | Option 3 |
| Bulgaria | Option 2 and 3 | Lithuania | Option 3 |
| Croatia | Option 5 | Luxembourg | Option 3 |
| Cyprus | Option 5 | Malta | Option 4 |
| Czech Republic | Option 4 | Netherlands | Options 4 and 5 |
| Denmark | Option 2 and 3 | Norway | Option 3 |
| Estonia | Option3 and 4 | Poland | Options 3 and 4 |
| Finland | Option 3 | Portugal | Option 3 |
| France | Option 3 | Romania | Option 3 |
| Germany | Option 3 | Slovakia | Option 3 |
| Greece | Options 4 and 5 | Slovenia | Option 3 |
| Hungary | Options 4 and 5 | Spain | Option 3 |
| Iceland | Option 4 | Sweden | Option 4 |
| Ireland | N/A | Switzerland | Options 2,3 and 4 |

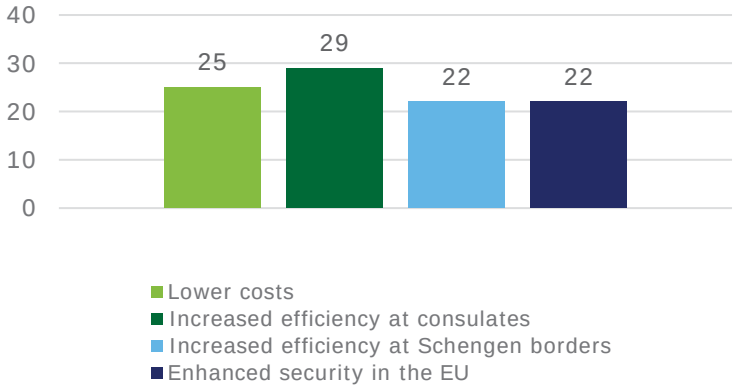
**Figure 10:** Question 18: Assessment of the potential benefits of a digital application service for the Member States (n=30)




Out of the potential benefits, lower costs, increased efficiency at the consulates and the reduction of the administrative burden for the central authorities and consulates are assessed favourably by the vast majority of the consulted Member States. The increase in travel and tourism to the Schengen Area is considered a benefit by 11 out of the 30 respondents.
A number of Member States also indicated other potential benefits related to the implementation of an EU digital application service, including simplifying the process for the applicants, easier handling of the visa fees and more effective document verification.

## Potential implementation of digital visa

**Figure 11**: Question 19: Assessment of the potential benefits of the implementation of a digital visa for the Member States (n=30)




29 Member States identified the increased efficiency at the consulates as a potential benefits of the implementation of a digital visa, whilst respectively 25, 22 and 22 respondents labelled the lowering of the costs, the increased efficiency at the Schengen border and the enhanced security within the European Union as possible upsides of the digital visa compared to the existing system with the visa sticker.

The questionnaire included a question to assess the inclusion of national long-stay visa within the European online platform and digital visa initiative. The responses to this question were not pointing clearly at one direction, with a group of Member States which would like to include the possibility to apply for a long-stay visa through the platform, Member States that do not want to include this option and a number of Member States that want to first evaluate the implementation of an European platform in regard to the Schengen visa before discussing the inclusion of national visa.

***Table 19**: Question 20: Overview of preference of the consulted Member States in regard to the inclusion of long stay visa in the online visa application platform*

| Member State | Should the online visa application platform cover long-stay visa along with short-stay visas (i.e. by 2025)? | Should the online visa application platform cover long-stay visas at a later stage? |
|---|---|---|
| Austria | Yes | Yes |
| Belgium | No | No definitive position |
| Bulgaria | No | No definitive position |
| Croatia | No | No definitive position |
| Cyprus | Yes | Yes |
| Czech Republic | No | No definitive position |
| Denmark | No | No |
| Estonia | No definitive position | No definitive position |
| Finland | N/A[137] | N/A |
| France | No definitive position | No definitive position |
| Germany | No | No definitive position |
| Greece | Yes | Yes |
| Hungary | No | No |
| Iceland | Yes | Yes |
| Ireland | N/A[138] | N/A |
| Italy | Yes | Yes |
| Latvia | No | No definitive position |
| Lithuania | Yes | Yes |
| Luxembourg | Yes | Yes |
| Malta | No definitive position | No definitive position |
| Netherlands | No | No definitive position |
| Norway | No | No |

[137] Finland did not answer this question.
[138] Ireland is not part of the Schengen area, and did not answer this question.

| | | |
|---|---|---|
| Poland | Yes | Yes |
| Portugal | No | No |
| Romania | Yes | Yes |
| Slovakia | Yes | Yes |
| Slovenia | Yes | Yes |
| Spain | No | No definitive position |
| Sweden | No | No |
| Switzerland | Yes | Yes |

Recurring advantages of the inclusion of long-stay visa within the EU platform mentioned by the consulted Member States include the following:

- eight Member States wanted to avoid having two different systems and procedures in place for short- and long-stay visas;
- three Member States listed the removal of the administrative burdens associated with the visa sticker altogether; and
- four Member States stated the synergies with the VIS regulation recast that already provides for data records on long-stay visas.

The main factor advising against including national visa into the EU platform are the differences in legislature and practices surrounding the issuing of long stay visa between Member States. Nonetheless, some Member States that are against the inclusion of national visa within the platform nonetheless mentioned that the implementation of a digital visa should cover the long-stay visa as well.

### Statistics regarding the application process

- On average, national authorities spend 8.74 minutes when replying to one visa application request received per phone, whilst spending 9.2 minutes for requests submitted via email;
- On average, consulate personnel require 15.02 minutes to take in a paper application directly from an applicant and encode it in the system. This includes collecting the visa fee.
- On average, it takes 6.8 minutes to capture and collect the biometrics of the applicant by the consulate;
- On average, the consulate spends 5.17 minutes to file one application file in the archive;
- On average, it takes 5.28 minutes to print a visa sticker and affix it to the passport or on a separate sheet in case the travel document is not recognised by the Member State.

### Current situation within Member States

The following table depicts the statistics reported by Member States for 2019 regarding the total number of long-stay visa applications submitted, the total number of issued long-stay, and the number of Schengen visa applications which were collected by the ESPs. The total number of submitted and issued short stay visa applications in 2019 are included as well from an external source to give an encompassing overview of the situation.

- The number of submitted and issued long stay visa varies a lot between Member States, with Iceland receiving 48 submitted long stay visa applications in 2019, whilst Poland received more than 1.1 million long stay visa applications.
- The ESPs play a substantial role in the collection of Schengen visa applications. On average, the ESPs collected 83,6% of the Schengen visa applications within a Member State.

*Table 20: Question 4-5-6: Overview visa statistics per Member State*

| Member State | Total number of submitted long stay visa applications in 2019 | Total number of issued long stay visa in 2019 | Total number of submitted short stay visa applications in 2019[139] | Total number of issued short stay visa applications in 2019[140] | Total number of Schengen visa applications collected by ESPs |
|---|---|---|---|---|---|
| **Member States that are part of the EU** | | | | | |
| Austria | 28 800 | 26 400 | 323 262 | 306 458 | 299 000 (85%) |
| Belgium | 40 600 | 32 000 | 248 021 | 190 222 | 211 000 (85%) |
| Croatia | N/A | N/A | N/A | N/A | 49 212 (66%) |
| Czech Republic | 69 257 | 56 092 | 739 818 | 699 088 | 686 274 (92%) |
| Denmark | 22 132 | In 2019, Danish missions issued 19 017 residence and work permit cases | 165 191 | 148 145 | ≈ 160 000 (98%) |
| Estonia | MFA/Consulates : 13 066<br>PBGB[141]: 13 695 | MFA/Consulates : 12 346<br>PBGB: 13 310 | 145 711 | 143 582 | 121 478 (83%) |
| Finland | 0[142] | 0 | 895 775 | 875 356 | 888 739 (99%) |
| France | 296 823 | 237 196 | 3 980 989 | 3 291 128 | 3 968 669 (99,6%) |
| Germany | 384 648 | 324 636 | 2 171 309 | 1.916.408 | 1 748 000 (80%) |
| Greece | 17 501 | 15 312 | 880 892 | 827 291 | 880 892 (85%) |
| Hungary | 29 120 | 21 914 | 237 851 | 217 108 | 155 199 (65%) |
| Italy | 86 439 | 149 034 | 2 053 521 | 1 892 648 | 1 856 986 (90,4%) |
| Latvia | 9 185 | 7 750 | 167 743 | 163 229 | 167 743 (72%) |
| Lithuania | 54 469 | 48 790 | 359 484 | 354 166 | ≈ 330 000 (91,7%) |

[139] Complete statistics on short-stay visas issued by the Schengen States, https://ec.europa.eu/home-affairs/what-we-do/policies/borders-and-visas/visa-policy_en.
[140] Complete statistics on short-stay visas issued by the Schengen States, https://ec.europa.eu/home-affairs/what-we-do/policies/borders-and-visas/visa-policy_en.
[141] Estonian Police and Border Guard Board.
[142] Finland does not issue long stay visa, solely resident permits.

| Member State | Total number of submitted long stay visa applications in 2019 | Total number of issued long stay visa in 2019 | Total number of submitted short stay visa applications in 2019[139] | Total number of issued short stay visa applications in 2019[140] | Total number of Schengen visa applications collected by ESPs |
|---|---|---|---|---|---|
| Luxembourg | 2 552 | 2 342 | 11 723 | 11 251 | 4 948 (42%) |
| Malta | 3 631 | 3 488 | 34 765 | 27 701 | 33 402 (96%) |
| Netherlands | 61 960 | 62 000[143] | 739 248 | 630 181 | 666 000 (90%) |
| Poland | 1 147 153 | 1 090 294 | 454 026 | 437 420 | 348 008 (75%) |
| Portugal | 48 064 | 37 807 | 297 236 | 235 897 | 251 044 (85%) |
| Slovakia | 6 934 | 5 702 | 25 202 | 23 504 | 12 246 (49%) |
| Slovenia | 978 | 926 | 27 722 | 21 685 | 22 145 (83%) |
| Spain | 195 776 | 179 642 | 1 912 500 | 1 668 171 | 1 721 018 (90%) |
| Sweden | 3 000 | 3 000 | 275 239 | 227 717 | 245 000 (89%) |
| **Member States that are not part of the EU** | | | | | |
| Iceland | 48 | 40[144] | 18 183 | 18 020 | ≈ 17 500 (95%) |
| Norway | 284 | 129 | 178 532 | 165 973 | 169 605 (95%) |
| Switzerland | 82 080 | 74 218 | 611 598 | 529 906 | 524 477 (86%) |
| **Associated Member States** | | | | | |
| Bulgaria | 14 435 | 13 111 | N/A | N/A | 35 735 (NA) |
| Croatia | N/A | N/A | N/A | N/A | 49 212 (66%) |
| Cyprus | 0 | 0 | N/A | N/A | 70 923 LTV due to CY status |
| Romania | 30 699 | 29 571 | N/A | N/A | 0[145] |
| **Other consulted Member States** | | | | | |
| Ireland | 31 908 | 28 612 | N/A | N/A | Not applicable as Ireland is not party to Schengen Acquis |

[143] This number may also involve applications lodged in 2018 but approved/issued in 2019.
[144] 40 long-term visas were issued and 8 refused (long term visas issued in Iceland). D visas (long stay visas) issued by Icelandic Embassies to those who have been granted a residence permit and need to travel to Iceland to have issued a residence permit were 108.
[145] Romania does not use ESPs.

## 3. Questionnaires: Consultation with Member States and Public Consultation

### I. Questionnaire for Member States

| **Purpose of the questionnaire:** | |
|---|---|
| **I. Contact details** | |
| **1.** ***Member State*** | Click here to enter text. |
| **2.** ***Institution*** | Click here to enter text. |
| **3.** ***Contact person / email*** | Click here to enter text. |
| **II. General consultation questions** | |
| **1.** ***Would the introduction of an online application procedure and a digital visa facilitate the existing (Schengen) visa application procedure and reduce possible administrative burdens for the central authorities and consulates? Which of the five options outlined in the cover note would better serve this purpose?*** | |
| **Reply:** | |
| **2.** ***What are the possible benefits of online visa applications and digital visas for the Member States? Do you expect digitalisation of visa processing to increase travel and tourism to the EU and thus to promote growth and employment? Do you have any evidence to quantify such impacts?*** | |
| **Reply:** | |
| **3.** ***Should the initiative only cover Schengen (short-stay) visas or also national (long-stay) visas? Why? List possible obstacles and advantages.*** | |
| **Reply:** | |
| **4.** ***What are – in your experience – the possible challenges related to internet accessibility and computer literacy (if any) for applicants in third countries when moving towards a digital visa procedure? Can you distinguish locations where specific issues might arise? How can these challenges be addressed and overcome?*** | |
| **Reply:** | |
| **5.** ***What particular problems might visa holders, public authorities (other than border guard and law enforcement) and private entities (e.g. hotels, banks, employers) face, when moving towards a digital visa processing (instead of a paper visa sticker affixed to the passport)? How could these problems be overcome? Should any additional access rights to the data in the Visa Information System (VIS) be considered?*** | |
| **Reply:** | |
| **III. State of play of the national online application tools (update)** | |
| **1.** ***Do you have (or plan to create in the short to mid-term) any online tool(s) to facilitate the visa application process for the applicant and/or the consulate?*** | |
| **☐ In operation ☐ Planned ☐ No** | |
| **Comment:** | |
| **2.** ***What types of visas does (or will) your online tool(s) cover?*** | |
| **☐ Schengen visa ☐ National visa ☐ Other:** | |
| **Comment:** | |
| **3.** ***When did you / when do you plan to introduce your online tool(s) to facilitate the visa application process?*** | |

**Reply: (year)**

4. ***If you significantly updated the online tool(s), when were the updates implemented?***

**Reply: (year)**

5. ***When will your online tool development, maintenance and support cycle/contract end?***

**Reply: (year)**

6. ***Which of the following basic functionalities and features are included in your online application platform:***

- ☐ **Wizard guiding the applicant on the type of visa**
- ☐ **Information about general rules for lodging an application**
- ☐ **Indication on the next available appointment before starting application process**
- ☐ **Creation of personal account**
- ☐ **Error detection / data quality check (e.g. alphanumeric)**
- ☐ **Filling in the application form**
- ☐ **Application fill-in and print out option (no direct link with the national VIS)**
- ☐ **Data upload to the national VIS (direct link with the national VIS)**
- ☐ **Upload of supporting documents**
- ☐ **Lists of supporting documents (per third country / travel purpose)**
- ☐ **Online payment of the visa fee**
- ☐ **Appointment management**
- ☐ **Signing the application:**
  - ☐ **Electronic signature or**
  - ☐ **Tick-box**
- ☐ **ESP access to correct or complete/upload data**
- ☐ **Other (provide information in the comment field)**

**Comment:**

7. ***Which of the following technologically advanced functionalities and features are included or are considered to be included in the your online application platform:***

**Choose the answer** **Chatbot to support preparation and application process (from start to finish)**
**Choose the answer** **Providing facial image with a webcam / smartphone**
**Choose the answer** **Identification with live face recognition using webcam / smartphone**
**Choose the answer** **Scan of the travel document to extract relevant data**
**Choose the answer** **Passport chip contents authentication using a smartphone**
**Choose the answer** **Photo morphing detection (for consulate)**
**Choose the answer** **Communication with the applicant through the online tool**
**Choose the answer** **Application status notification or verification**
**Choose the answer** **Statistics and reports on the submitted applications (for consulates)**
**Choose the answer** **Smartphone application**
**Choose the answer** **Other (provide information in the comment field)**

**Comment:**

| |
|---|
| **IV. Technical questions** |
| **A. Online application** |
| **1. Interaction with the applicant and work with the paper file today** |
| ***1.1. What is the average number of calls and/or emails from applicants related to the visa application process received at your consulates monthly?*** |
| **Reply:** |
| ***1.2. What is the average time spent replying to <u>one</u> visa application process related request received by phone or email?*** |
| **Reply: (min)** |
| ***1.3. What is the average time the consulate spends to accept <u>one</u> paper application file (checking competence, completeness and admissibility)?*** |
| **Reply: (min)** |
| ***1.4. Please estimate how the time spend to accept, admit and examine application file will change, if applicants submit the application form and supporting documents only online and the online portal performs a check of completeness and quality?*** |
| **Reply:** |
| ***1.5. What is the average time the consulate spends to file <u>one</u> paper application file in the archive (selection, assessment, binding, organising etc.)?*** |
| **Reply: (min)** |
| ***1.6. What are the estimated costs to archive visa applications and supporting documents (paper-based format) for 2 years? Please consider the costs related to premises, security and destruction.*** |
| **Reply: (EUR)** |
| |
| ***2. The feasibility study estimated the costs that the EU would face related to the development and maintenance of an EU online application portal, as well as the costs the Member States will face related to the existing national online application tools or the adaptation and maintenance of the national systems to accommodate the EU online application portal. In addition to these potential costs for system development and maintenance, do you expect any additional costs at the national level related to the implementation of the EU online application portal (e.g. training, change management)? If yes, please provide estimations (EUR)*** |
| **Reply:** |
| **B. Digital visa** |
| **1. The feasibility study concluded that implementation of the digital visa would require additional investments at the national level: software to generate an encrypted 2D barcode, software for the border and/or law enforcement officers' devices to read the 2D barcodes and update of national systems to upload information about the issued visa to the EU portal for the purpose of notifying applicants.** |
| ***1.1. How many of your border control and law enforcement officers are equipped with portable devices which have internet connection, specialised applications and a camera to be able to scan and read the 2D barcode?*** |
| **Reply:** |

| |
|---|
| **1.2.** ***Do you plan to increase the number of officers equipped with such devices over the next 3-4 years? To what extent? If a digital visa would be implement, how many devices should be purchased?*** |
| **Reply:** |
| **1.3.** ***In addition to the potential costs mentioned above, do you expect any other costs at national level related to the implementation of the digital visa?*** |
| **Reply:** |
| **3.** ***What is the number of FTEs[146] dedicated to visa sticker management, printing and affixing in you consulates p.a.[147]? What is the average time needed to print a visa sticker and affix it to the passport (including all tasks needed for visa sticker management)?*** |
| **Reply: (min)** |
| **4.** ***Without the costs associated with the visas sticker production, transportation and personalisation, what would be other savings related to the digital visa introduction?*** |
| **Reply: (EUR)** |

[146] FTE means full-time equivalent (one person assigned at 100% to a task equals 1 FTE).
[147] Per annum (p.a.): refers to an average over the last 3 years (i.e. 2016, 2017, and 2018).

## II. Questionnaire for the public consultation

## I. Introduction

Have you obtained a short-stay 'Schengen' visa over the past 5 years or would you like to make your voice heard on how the visa process could be modernised?

The European Commission, in its 2020 New Pact on Migration and Asylum, set the objective of making the Schengen visa procedure fully digitalised by 2025, and would like to hear your views on the idea to digitalise the current visa process, which includes the possibility for visa applicants to apply for a visa online and replacing the current (paper) visa sticker by a digital document.

To apply for a Schengen visa, applicants today have to fill in an application form, gather the necessary supporting documents and then book an appointment at a consulate or – in most cases – a visa application centre managed by an external service provider, to submit the application, give their fingerprints, have a photo taken and pay the visa fee (in cash, by credit card or bank transfer).

The initiative would introduce a number of novelties for visa applicants and Member States. The online application process would enable a large number of applicants to submit their applications online, without having to show up in person at the consulate or visa application centre. In case of a positive decision, the visa would be issued in a digital format, accessible to the visa holders and the authorities that need to have access.

This consultation concerns the digitalisation of the EU's visa procedures. To travel to the EU, third country nationals may require a Schengen visa (Type C) or long-stay visa (Type D). This consultation focuses mainly on the Schengen Visa which entitles its holder to travel throughout the 26 Member States[148] for up to 90 days in any 180-day period.

**Individuals:** Tell us about your experience and views by replying to our questionnaire. You do not need to answer all of the questions. However, for your response to be taken into account, all questions under the 'About you' section need to be answered. If you have any concerns regarding data protection matters, please consult the Privacy Statement.

**Organisations:** Send written contributions on any issue linked to the visa process digitalisation through the online questionnaire. Organisations are also invited to encourage individual members to reply to the questionnaire.

**Disclaimer**

The possible changes to the visa procedures envisaged in this questionnaire do not prejudge the final options that will be proposed by the European Commission. The questions refer to specific options for digitalisation of the procedures currently being considered by the European Commission.

## II. About you (all respondents)

[148] Belgium, Czech Republic, Denmark, Germany, Estonia, Greece, Spain, France, Italy, Latvia, Lithuania, Luxembourg, Hungary, Malta, the Netherlands, Austria, Poland, Portugal, Slovenia, Slovakia, Finland, Sweden, Iceland, Liechtenstein, Norway and Switzerland.

1. **Language of my contribution**
   *Language drop list*

2. **I am giving my contribution as**
   *Defined drop list*

3. **First name**
   *Free text*

4. **Surname**
   *Free text*

5. **Email (this won't be published)**
   *Free text*

6. **Have you applied for a Schengen visa in the past five years?** *(only for non-EU citizens)*
   *Yes/No*

7. **What was the (main) reason for travel?** *(Single choice) (only for Yes Q6)*
   - *Tourism*
   - *Business/professional training/conference*
   - *Visit to family/friends*
   - *Cultural/sports event*
   - *Medical treatment*
   - *Other*

8. **I travel frequently to the Schengen area (more than twice a year – at least before COVID-19-related travel restrictions)** *(only for Yes Q6)*
   *Yes/No*

9. **I am a family member of a mobile EU citizen travelling with or joining the EU citizen (i.e. I am covered by Directive 2004/38/EC)** *(only for Yes Q6)*
   *Yes/No*

10. **What is your age group:** *(only for Yes Q6)*
    - *18 to 24*
    - *25 to 39*
    - *40 to 60*
    - *above 60*

11. **Scope** *(only for organisations)*

*Defined drop list*

12. **Level of governance** *(only for organisations)*
    *Defined drop list*

13. **Organisation name** *(only for organisations)*
    *Free text*

14. **Organisation size** *(only for organisations)*
    *Free text*

15. **Transparency register number**[149] *(only for organisations)*
    *Free text*

16. **Country of origin**[150]
    *Country drop list*

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association, 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

Contribution publication privacy settings[151]

(***for individuals)***

**Anonymous:**

The type of respondent that you responded to this consultation as, your country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself.

**Public**

Your name, the type of respondent that you responded to this consultation as, your country of origin and your contribution will be published.

***(for organisations)***

**Anonymous**

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its

[149] Check if your organisation is on the transparency register (. It's a voluntary database for organisations seeking to influence EU decision-making.
[150] Please add your country of origin, or that of your organisation.
[151] The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

**Public**

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

**I agree with the personal data protection provisions** *(hyperlink) (check box)*

## III. Cost and benefits for visa applicants (only persons having previously applied for a Schengen visa)

The following questions will help the European Commission to estimate the costs and benefits of visa digitalisation for visa applicants.

**17. When you last applied for a Schengen visa, did you encounter any of the following difficulties?** *(at most 3 choice(s))*

- *I had to travel long distance to the consulate / visa application centre.*
- *The application process was time consuming.*
- *The application process was complicated.*
- *My application was not admitted due to incomplete file or other mistakes.*
- *I could not travel during the application process because my passport was at the consulate.*
- *I did not know when to collect my passport from the consulate/visa application centre.*
- *Other: _____*
- *No particular difficulty.*

**Please specify other:** *(free text)*

**18. When you last applied for a Schengen visa,**

- ***which distance did you have to cover to get to the next consulate or visa application centre****: … km*
- ***how many hours did it take you to get there, to apply and to get back (total time spent):*** *… hours*
- ***how much did you pay for the transport to get there (return trip):*** *… EUR*
- ***how much did you pay for accommodation in that location:*** *… EUR*

**Apart from the visa and service fees, costs of providing supporting documents and travel medical insurance, were there any other costs? If yes, for what and how much**: *(free text)*

19. **How did you retrieve your passport at the end of the visa application and how much did you pay?**
    - ***By personal pick-up****: … EUR in transportation costs*
    - ***By courier delivery****: … EUR in delivery costs*

20. **Do you expect any additional costs due to the online application and the digital visa?**
    *Yes / no*

    **If yes, for what and how much:** *(free text)*

21. **How easy or difficult would the following tasks be for you:**
    - *accessing the internet to submit an application online, or to have access to the digital documents (e.g. digital visa, if/once your visa is issued)*
    - *receiving and reading email messages*
    - *online / mobile payment*
    - *scanning and uploading documents to an online website/portal*
    - *scanning your travel document with your mobile device (through a dedicated app)*
    - *using support tools, such as online tutorials or chatbots*

    *(on each point, rank from very easy to very difficult from 1 to 5)*

22. **Which form of electronic payment tools would you be able to use?** *(at most 5 choice(s))*
    - credit cards
    - debit cards
    - PayPal
    - mobile payment
    - Other: …

    **Please specify other:** *(free text)*

## IV. General views (all respondents)

23. **What is your general view on making visa procedures less paper-based and more digital?**
    *Very positive – positive – neutral – negative – very negative*

24. **Do you think that digital visa procedures would:**
    - *promote travel and tourism to the EU*
    - *promote family visits / business / cultural or scientific exchanges*
    - *contribute to a positive image of the EU or Schengen Area*
    - *lead to greater transparency in the Schengen visa process*
    - *promote the security of the Schengen Area*

    *(on each point, rank from 1 (strongly agree) to 5 (strongly disagree))*

## V. Online application (all respondents)

Instead of a paper-based application that exists today, the applicants would use an online portal to apply for a Schengen visa in the future. The visa portal would allow the applicants to:

- fill out the digital application form online,
- upload the supporting documents and a copy of the passport,
- pay the visa fee online,
- book an appointment (where necessary – see below for further information),
- sign and submit the application electronically,
- track their application status online and
- receive a notification when a decision has been taken.

Booking an appointment to visit the consulate or visa application centre might still be necessary for first-time applicants and then every five years to give fingerprints and have a photo taken, as well as each time the visa applicant has a new passport. If they don't fall into any of these cases, repeat visa applicants would therefore be able to complete the entire application process online, without visiting the consulate or visa application centre.

25. **Do you agree that such an online application process would facilitate the Schengen visa application procedure for visa applicants?**
    *Strongly agree – agree – neutral – do not agree – do not agree at all*

    *(if not agree/do not agree at all):* **Why? …**

26. **What would be the main benefits of the online application?** *(at most 3 choice(s))*
    *The application procedure would be:*
    - *quicker*
    - *cheaper*
    - *more transparent / predictable*
    - *more user-friendly*
    - *more modern and in line with an increasingly digital world.*

    **If you see any other benefit, please specify:** …

27. **How important do you consider the fact that (repeat) applicants would not have to visit the consulate or visa application centre?**
    *Very important – important – neutral – not very important – not important at all*

28. **Do you foresee any obstacles / drawbacks for visa applicants with the online application procedure?**
    *Yes / no*

    **If yes, what would be the main obstacles / drawbacks?** *(at most 3 choice(s))*
    - *no / bad access to the internet*
    - *lack of necessary equipment (e.g. computer/mobile phone) to access the application portal*

- *applicants' lack of computer literacy*
- *online / mobile payment*
- *scanning and uploading documents*
- *no possibility to ask questions*
- *concerns about privacy / data security*
- *other: …*

**Please specify other:** *(free text)*

**What would help applicants to overcome these obstacles / drawbacks?** *(at most 3 choice(s))*
- *support from relatives or friends*
- *support from travel agencies or other intermediaries*
- *support from visa application centres or consulates*
- *support through online tutorials*
- *support through automated chatbots in the online portal*
- *maintaining the paper-based procedure in exceptional cases*
- *other: …*

**Please specify other:** *(free text)*

29. **It would be preferable to submit the Schengen visa application on:**
    - *a single EU digital visa portal, regardless of the main destination of the trip*
    - *national portals managed by each EU Member State, depending on the main destination of the trip*
    - *both solutions would be fine*

Schengen visas (C type) are valid for short stays in the EU up to 3 months. For stays of more than 3 months (and up to one year), for example for studying or working in the EU, it is necessary to apply for long-stay visas (D type).

30. **How important do you consider the possibility to apply online not only for Schengen visas (for stays up to 3 months), but also for long-stay visas (for stays between 3 months and 1 year)?**
    *Very important – important – neutral – not very important – not important at all*

## VI. Digital visa (all respondents)

Nowadays visas are issued in the form of a paper visa sticker affixed to the passport. In the future, visas could be issued in a secure digital format**.** Applicants would be notified on the decision taken by the consulate (if the visa is issued, refused etc.) by email or other electronic means. The notification would contain the data currently found on the visa sticker and (possibly) a barcode. A secure verification tool, which would be part of the digital visa portal, would enable applicants both to verify the status of their application and the validity of their visa after issuance.

By moving away from paper visa stickers, the visa procedure would change from the point of view of the applicants/visa holders: the applicants would no longer need to leave their passport with the consulate for the duration of the application procedure. The applicants would thus be able to travel abroad while the visa application is being processed. Collecting the passport at the end of the procedure, or receiving it via courier delivery, would also not be needed anymore. Digital visa validity would be independent of the validity of passports, meaning that a valid visa could be confirmed and linked to a new passport (also in cases of lost or stolen passports).

31. **Do you agree that the digital visa (instead of the physical sticker) would facilitate the Schengen visa application procedure and travelling to the EU Schengen area for visa holders?**
    *Strongly agree – agree – neutral – do not agree – do not agree at all*

32. **Which advantages of the digital visa do you consider as important?**
    - *Not having to leave a passport for a period of time at the consulate and thus the possibility to travel abroad during the visa application procedure.*
    - *Not having to retrieve the passport at the end of the visa application procedure.*
    - *Having easy access to the visa status from a mobile device.*
    - *The visa could remain valid even if the passport validity expires or if the passport is lost or stolen, and could be transferred to a new passport.*
    - *Smoother border control checks.*

    *(on each point, rank in importance from 1 to 5)*

33. **Do you foresee any obstacles / drawbacks for holders of a digital visa?**
    *Yes / no*

    **If yes, what would be the main obstacles / drawbacks?** *(atmost 3 choice(s))*
    - *no / bad access to the internet*
    - *lack of necessary equipment to access the digital visa*
    - *applicants' lack of computer literacy*
    - *limited access to the visa by other parties (carriers, hotels etc.)*
    - *concerns about personal data / privacy*
    - *other: …*

    **Please specify other:** *(free text)*

34. **What would be important features for visa applicants:** *(atmost 3 choice(s))*
    - *email notification on visa status (issued, refused, revoked, annulled, extended)*
    - *the possibility to print out the digital visa*
    - *permanent access to an EU online visa portal to check the visa status*
    - *support tools, such as online tutorials or chatbots*
    - *the possibility to contact the authorities*

- *other: …*

**Please specify other:** *(free text)*

**VII. Conclusion (all respondents)**

**35. Are there other problems that should/could be addressed?** *If you wish to add information on other issues linked to the digitalisation of visa procedures, please feel free to do so here: (free text)*

**36. You can upload here a concise written contribution (such as a position paper) on any issue linked to the digitalisation of visa procedures.** The maximal file size is 1MB.

Please note that your responses to the questionnaire as well as the uploaded document will be published.

# ANNEX 3 – WHO IS AFFECTED AND HOW?

## 1. Practical implications of the initiative

The preferred option (O4) would have a positive **impact on EU travel and GDP** with an additional GDP of EUR 53.3 billion on the 2025-2029 period, as it would mark the transition from a largely paper-based application process to a truly digital and harmonised process.

The EU visa application platform would **benefit Member States** by decreasing time spent by consulates on processing and archiving paper visa applications. Cases of visa shopping would be directly reduced and checks against the Visa Information System would be done at an earlier stage allowing only admissible applications for processing

The digital visa would improve the internal security of the Schengen area, as the visa sticker could no longer be falsified, and would considerably **reduce the administrative burden on Member States' central authorities** and consulates, who would no longer have to spend time and money on manufacturing, ordering and securely transporting visa stickers to the consulates. Overall, Member States would save EUR 553 million in administrative costs on the 2025-2029 period under O4.

Finally, **visa applicants** would also benefit from option 4. Repeat applicants would no longer need to incur the cost of travel to apply for a visa, and applicants would keep their travel documents with them throughout the application process. Under option 4, each applicant would save EUR 31 per application out of a total of EUR 74 spent in the baseline scenario for each application.

## 2. Summary of costs and benefits

***Table 21**: Overview of benefits for the preferred option*

| I. Overview of Benefits (total for all provisions) – Preferred Option | | |
|---|---|---|
| **Description** | **Amount** | **Comments** |
| ***Direct benefits*** | | |
| Cost savings for third country nationals (2025-2029) | Average cost saved by one applicant in the application process: approximately EUR 14<br><br>Average cost saved by one applicant to pick up travel document: approximately EUR 17<br><br>**Average total cost saved by one applicant (application and pick-up): approximately EUR 31**<br><br>Total cost saved by all applicants in the application process: EUR 1.3 billion<br><br>Total cost saved by all applicants to pick up travel document: EUR 1.6 billion<br><br>**Total cost saved by all applicants: EUR 2.9 billion** | **Recipient: third-country nationals**. As most repeat applicants would be able to submit their applications in a totally digital manner, they would no longer need to spend money and time to visit a consulate/VAC and to pick up their travel document. Moreover, although first time applicants will still have a cost associated with travelling during the application process, the expenditure related to collecting the travel document is abolished for them as well. |

| | | |
|---|---|---|
| Cost savings for Member States (2025-2029) | **Archiving visa applications**<br>Cost saved by all MSs on resources: EUR 4.4 million<br><br>Average cost saved by one MS on resources: EUR 170 000<br><br>**Visa stickers**<br>Cost saved by all MSs: EUR 80.3 million<br><br>Average cost saved by one MS: EUR 3.1 million | **Recipient: Member States.** The online storage would enable cost savings on paper-based archiving and real estate; the removal of the visa sticker would enable Member States to save current costs to procure, transport, store and print stickers. |
| Administrative cost savings for Member States (2025-2029) | **Processing visa applications**<br>Time saved by all MSs: 867 FTEs<br><br>Cost saved by all MSs on staff: EUR 38.1 million<br><br>**Replying to queries**<br>Time saved by all MSs: 576 FTEs<br><br>Cost saved by all MSs on staff: EUR 25.3 million<br><br>**Archiving visa applications**<br>Time saved by all MSs: 4 248 FTEs<br><br>Cost saved by all MSs on staff: EUR 186.9 million<br><br>**Managing visa stickers**<br>Time saved by all MSs: 4 014 FTEs<br><br>Cost saved by all MSs on staff: EUR 176.6 million<br><br>**Total FTEs saved by all MSs: 9 685**[152]<br><br>**Total FTEs saved on average by one MS: 372**<br><br>**Total admin costs saved by all MSs: EUR 510.9 million**<br><br>**Total admin costs saved on average by one MS: 19.7 million** | **Recipient: Member States**. The online submission of most visa applications and the automated functionalities of the EU platform would enable Member States to save time and staff currently allocated to the intake and archiving applications, and replying to queries by applicants. The digital visa would enable savings on staff currently managing (printing and affixing) visa stickers. |
| Lower use of paper due to digital visa and application platform (2025-2029) | Paper saved: approximately 3 million kg | **Recipient: Member States & environment**. The majority of third-country nationals would no longer use paper to submit their application form and supporting documents. Paper currently used for stickers would no longer be needed. |
| Lower $CO_2$ emissions during the application process (2025-2029) | $CO_2$ saved: approximately 1.4 billion kg | **Recipient: Environment.** The majority of repeat applicants would no longer need to visit a consulate/VAC to apply, hence their carbon footprint during the application process would be sensibly reduced. |
| Lower risk of fraud and thus | *Not quantified* | **Recipient: Schengen border authorities & EU residents** with regard to the removal of |

[152] Includes 59 extra FTEs needed to collect biometrics of the additional group of third country nationals expected to apply under O4.

| | | |
|---|---|---|
| strengthening security of the EU | | the sticker. It would reduce the risk of fraud and enable Schengen border authorities to exploit the synergies of interoperability. |
| Harmonised data management practices for processing of data | *Not quantified* | **Recipient: third country nationals.** With the EU platform the Member States would no longer use their national data management practices that are currently not harmonised. |
| More attractive image of the Schengen Area | *Not quantified* | **Recipient: Member States and third country nationals.** The EU platform would offer a coherent and harmonised entry point to third country nationals, increasing the consistency and attractiveness of the Schengen Area and encouraging travel. This would increase the incentives to travel for third country nationals. |
| Increased mobility for third country nationals | *Not quantified* | **Recipient: third country nationals**, who would be free to use their passport and travel during the application process; Repeat applicants with reduced mobility would no longer need to appear in person at a consulate/VAC. |
| Reduced reliance on External Service Providers (ESPs) | *Not quantified* | **Recipient: third country nationals**. There is no longer a need for ESPs to intake visa applications and process personal data of repeat applicants. Third country nationals would therefore not have to pay additional fees for the ESP to apply for a visa and/or lower fees may apply. |
| ***Indirect benefits*** | | |
| Contribution of international travel to EU GDP (2025-2029) | Approximately EUR 19.1 billion | **Recipient: Member States**. By encouraging more third county national to apply for a visa, the EU platform would increase the number of travellers and the GDP contribution of visa holders/third country nationals would increase accordingly. |
| Lower risk of visa shopping | *Not quantified* | **Recipient: Member States**. By providing a single-entry point for all visa applications, the EU platform would oblige third country nationals to apply for the competent Member State. It would limit the input of misleading information on the Member State of entry. |
| Benefits for the visa examination process | *Not quantified* | **Recipient: Schengen visa authorities and border authorities**. If Schengen visa authorities re-allocate (part of) the saved FTEs to decision-making, Member States may further improve the examination and risk assessment of visa applicants, thereby further contributing to EU security. |

***Table 22**: Overview of costs for the preferred option*

| II. Overview of costs – Preferred option | | | | | | | |
|---|---|---|---|---|---|---|---|
| | | EU institutions | | Member States | | Third country nationals | Environment |
| | | One-off | Recurrent | One-off | Recurrent | Recurrent (no one-off costs) | Recurrent (no one-off costs) |
| **EU application platform** | Direct costs | **EU digital application platform (total: EUR 31.2 – 38.1 million)**<br>Design: EUR 6.3 – 7.6 million<br>Development: EUR 5.9 – 7.2 million<br>Testing: EUR 4.7 – 5.8 million<br>Deployment: EUR 1.6 – 2 million<br>Hardware & Infrastructure: EUR 11.3 – 13.8 million<br>Overhead: EUR 1.4 – 1.7 million<br>**VIS adaptations (total : 2.6 – 3.1 million)**<br>Initial migration: EUR 220 000 – 270 000<br>Synchronisation: EUR 200 000 – 240 000<br>Hardware & Infrastructure : EUR 2.2 – 2.6 million<br>**Training costs: EUR 20 000 – 33 000**<br>**Development support staff: EUR 2.5 million** | **Yearly recurrent costs: EUR 10.5 – 12.8 million**<br>EU digital application platform: EUR 8.2 – 10 million<br>VIS adaptations: EUR 390 000 – 480 000<br>Licenses: EUR 1.9 – 2.3 million | **EU digital application platform (average per MS): EUR 2.8 – 3.3 million**<br>Integration & adaptation: EUR 270 000 – 330 000<br>Hardware & Infrastructure : EUR 2.5 – 3.0 million<br>**EU digital application platform (all MSs): EUR 68.3 – 83.5 million**<br>**Training costs**<br>Average per MS: EUR 33 000<br>All MSs: EUR 858 000 | Total recurrent costs (average per MS): Maintenance & Operations: EUR 460 000 – 570 000<br>Total recurrent costs (all MSs): Maintenance & Operations: EUR 11.6 – 14.1 million | N/A | N/A |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| | Indirect costs | N/A | N/A | N/A | N/A | Potentially limited access to IT tools (decreases with time)<br>Potentially higher service fee for IT assistance (decreases with time)<br>Additional processing of personal data by the platform (email address, credentials); and potentially by ESPs (on-site identification of first-time applicants) | $CO_2$ produced by increased travel to the EU (2025-2029): approximately 8.5 billion kg |
| **Digital visa** | Direct costs | N/A | N/A | N/A | N/A | N/A | N/A |
| | Indirect costs | N/A | N/A | N/A | N/A | N/A | N/A |

## ANNEX 4 – METHODOLOGICAL NOTE ON COSTS AND BENEFITS

This annex lists the general and option-specific assumptions and estimates that are adopted to estimate the impacts of the policy options to digitalise the Schengen visa process. The reader is referred to the 'Study to assess the various options related to visa process digitalisation and to support the preparation of an impact assessment - Final Report'[153] for details on the rationale and calculations behind the assumptions.

***Table 23:*** *Assumptions used in the study*

| Assumption | Value |
|---|---|
| General assumptions (valid for all options) | |
| Number of baseline visa applications (2025-2029) | 17.8 million |
| Contribution of Visa holder-TCNs to GDP against total contribution of international travel to GDP | 19.7% |
| Average time for checking visa sticker at the border | 10 seconds |
| Average time to receive and admit a Schengen visa application at the consulate | 15 minutes |
| Average time to enrol biometrics of a Schengen visa applicant at the consulate | 6.6 minutes |
| Percentage of visa applications for which applicants submit a query to consulate / ESP | 16% |
| Average time spent by the consulate to reply to one query | 8.9 minutes |
| Percentage of visa applications collected by consulates vs ESPs against the total number of visa applications submitted | 90% |
| Percentage of repeat visa applicants | 75% |
| Percentage of applicants expected to utilise the available digital solutions | 97% |
| Average cost for one visa applicant to travel to the consulate / VAC to apply | EUR 56.89 |
| Average cost for one visa applicant to travel to pick up the travel document | EUR 16.84 |
| Weighted average of the carbon footprint of one third country national travelling to the EU | 0.18388492 kg $CO^2$/km[154] |
| The average distance between one visa applicant and the closest VAC or consulate | 129.79 km[155] |
| Average distance covered by one TCN to reach the Schengen Area | 4 073.74 km[156] |
| Assumptions related to Option 1 | |
| Percentage of visa applicants needing to travel in visa application process | 100% |
| Level of digitalisation of visa process in the Member States | *Refer to external study* |
| Assumptions related to Option 2 | |
| Percentage of visa applicants needing to travel in visa application process | 76% |

[153] Study to assess the various options related to visa process digitalisation and to support the preparation of an impact assessment - Final Report, available: https://ec.europa.eu/home-affairs/study-assess-various-options-related-visa-process-digitalisation-and-support-preparation-impact_en.
[154] Reflecting the tourist transportation trends within the European Union Tourism Trends 2018, which states that 47% will travel to the EU by air, 40% by land and 3% by water, and the aforementioned carbon footprints of these means of transportation.
[155] Based on 247 observations from the public consultation.
[156] This value was obtained based on the number of short-stay visas issued to citizens of each third country, and on the distance between the capital of each third country and Berlin (i.e. a central location in the Schengen Area). Each distance was multiplied by the total number of visas issued to the third country in question. Finally, the results for each third country were summed up.

| Assumption | Value |
|---|---|
| Assumptions related to Option 3 | |
| Number of Member States expected to join the optional digital application platform | 16 |
| Growth rate in visa applications due to digital process | 2% |
| Rate of queries that are solved by the introduction of the platform (with no need for intervention by ESP / consulate staff) | 50% |
| Percentage of paper saved during the visa application process (valid also for options 3 and 4) | 60% |
| Assumptions related to Option 4 | |
| Growth rate in visa applications due to digital process | 2% |
| Assumptions related to Option 5 | |
| Number of applicants needing to travel in visa application process | 3% |
| Growth rate in visa applications due to digital process | 4% |

## ANNEX 5 – GLOBAL TRENDS ON VISA PROCESS DIGITALISATION

### International perspectives and benchmarking

As global mobility is increasing, more and more countries are digitalising their visa services. Not only to be able to meet the continuing rise in demand but also to accommodate the expectations of applicants for digital public services. However, as the number of people crossing the borders s increases, so do the security risks. By digitalising their visa process, countries on the one hand aim to offer to the applicants a better service and on the other hand improve their risk assessment capabilities through increased availability of digital data and interoperability of systems in which this data is recorded.

The development and implementation of an EU online application platform also intends to meet these contemporary demands and expectations. It will contribute to the digitalisation of public services, making Europe fit for the digital age, and to a safe and secure EU.

### Benchmarking countries

When identifying countries for benchmarking, the guiding principle was that there should be a high visa volume as well as a high degree of digitalisation of the visa procedures. The following countries have been taken into consideration in the identification phase: Australia, Canada, China, India, New Zealand, Russian Federation, UK, US.

In order to establish how the envisioned EU online application platform compares with similar systems these countries have in place, the benchmarking was carried out on following principles:

- **all third country nationals** who are subject to visa requirements can apply online;
- **all visas** are issued digitally.

Desk research has shown that, of the eight aforementioned countries, only two have digitalised their visa procedures as expected for the future EU Online application platform: Australia and New Zealand. The digital visa services that the other six countries have in place do not fully meet these principles and are therefore not suitable for comparison. The majority of the eVisa services that these countries offer are more similar to ETIAS. They have been introduced to pre-screen visa exempt travellers prior to travel or to facilitate certain foreign nationals subject to visa requirements in quickly and easily obtaining an electronic travel authorisation (ETA) for specific travel purposes. When the eligibility requirements to apply for a travel authorisation are not fulfilled, visa required third country nationals cannot, or only partially, apply online and visas are issued in paper format, affixed to the travel document.

### Benchmarking digital visa systems Australia and New Zealand

For the benchmarking exercise, the Visitor visa systems of Australia and New Zealand were compared with the prototype[157] of the EU Online application platform on the basis of the most common steps in the online application procedures and the issuance and verification of digital visas.

| **Digital Services for applicants** | **EU** | **Australia** | **New Zealand** |
|---|---|---|---|
| Visa type | **Prototype** | **Visitor visa** | **Visitor visa** |
| Apply online | ✓ | ✓ | ✓ |
| Creation of an account | ✓ | ✓ | ✓ |
| Upload digital facial image | - | ✓ | ✓ |
| Upload bio date page travel document | ✓ | ✓ | ✓ |
| Upload digital documents | ✓ | ✓ | ✓ |
| Online payment during application process | ✓ | ✓ | ✓ |
| Collection of biometrics at consulate or VAC | ✓ Every 5 years | ✓ For each application | ✓ For each application |
| Check application status | ✓ | ✓ | ✓ |
| Check validity biometrics online | ✓ | Not applicable | Not applicable |
| Digital visa | ✓ | ✓ | ✓ |
| View digital visa details online | ✓ | ✓ | ✓ |
| Request extension online | ✓ | ✓ | - |
| Chatbot | ✓ | ✓ | - |

### Conclusion

The services that a future EU Online application platform would offer are almost equal to the Visitor Visa systems of Australia and New Zealand with the exception of uploading a facial image by the applicant. A major difference concerns the enrolment of biometrics. Foreign nationals wishing to travel to Australia or New Zealand, are required to provide their biometric at a VAC every time they apply. The future EU Online application platform, would enable repeat applicants to submit their application entirely online until the 59-month validity of their biometrics. This distinguishing feature would make the envisioned EU system the ahead of its time.

### State of play Australia and New Zealand

**Australia**

[157] The development of a prototype of an EU online application platform is part of the recommendation in the feasibility study on digitalisation of visa procedures, to conduct a two-phased pilot

Australia was the first country in the world to launch electronic visas in 1996 by introducing an Electronic Travel Authority System (ETA), a system that allowed visas to be issued electronically, linking them to the applicant's passport and eliminating paper application forms.
The short stay visa regime caters different groups of applicants: **eVisitor, ETA, and Visitor visa**. eVisitor is reserved for European citizens, allowing them to travel to Australia for up to 3 months per visit, for tourism or business purposes. It is a pre-screening before travel and therefore similar to ETIAS despite the fact that European citizens are not exempt from the visa requirement.
ETA is an electronic travel authorisation for a short term stay and reserved for nationals of Brunei, Canada, Hong Kong (SAR PRC), Japan, Malaysia, Singapore, South Korea and the United States.
The Visitor visa is required for all other foreign nationals and therefore similar to the future EU online application platform. Applying for a Visitor visa can be done fully online but applicants are required to appear in person and provide biometrics for each application.
Australia officially ceased the issuance of visa stickers in 2015. All visas are recorded in a central database where they can be accessed through an online verification Service called VEVO (Visa Entitlement Verification Online), allowing visa holders, employers, education providers and other organisations to check visa details and conditions.

**New Zealand**

In 2019 New Zealand launched the New Zealand electronic Travel Authority (NZeTA) which is similar to ETIAS as it is a requirement for visa exempt foreign nationals (including EU-citizens) for a short-term stays for tourism, visiting friends and family, meetings, short term study or a transit through Auckland International Airport.
Visa-required nationals need to apply for a **Visitor** visa which can be done fully online. In almost all cases applicants are required to visit a VAC to provide their biometrics which has to be done for each subsequent application.
New Zealand abolished the use of the paper visa sticker in 2018. All issued visas are recorded in a central database where they can be accessed through a Visa Verification Service. Applicants also receive an eVisa letter to be printed out and carried during the journey. Upon request and payment of a fee a visa sticker can be affixed to the holder's passport.

**State of play of other six countries – short overview**

**Canada**

Foreign nationals that are subject to visa requirements need to obtain a Visitor visa. They can apply online but most applicants still need to go to a VAC for the collection of biometrics. The validity of biometrics is 10 years so repeat applicants do not have to provide them for subsequent applications within that time period. They can check the validity with an online tool. Visas are issued as a sticker and when granted, the applicant needs to submit the travel document to the VAC once more in order to have the visa sticker affixed.

An Electronic Travel Authorisation (ETA) is required for visa-exempt foreign nationals (including EU/EEA countries and Switzerland) if they arrive in Canada by air. This can be done fully online and

the travel authorisation is issued electronically. This system was introduced in 2016 and is equal to ETIAS in terms of purpose and target group.

**China**

In 2018, China introduced the China Online Visa Application (COVA), which all nationals who require a visa (including citizens of the EU, EEA and Switzerland) are obliged to use to submit their application form online. However, after submitting it online, applicants should print and sign the form and submit it along with all other required documents to the consulate. Visas are issued in paper format and affixed to the travel document. China is considering offering a fully digital application procedure in the future for eligible foreign nationals.

**India**

India introduced the Electronic Travel Authorization (ETA) for citizens from more than 40 countries in 2014, extending it to 113 countries in 2015 while also renaming it e-Tourist Visa (eTV). In 2017, the scheme was renamed e-Visa and divided into 5 subcategories: e-Tourist Visa, e-Business Visa, e-Conference Visa, e-Medical Visa and e-Medical Attendant Visa. Applicants receive their e-Visa by e-mail and they are obliged to carry a copy at the time of travel. Currently there are 151 countries eligible for e-Visa (including EU-, EEA-countries and Switzerland).

Foreign nationals not eligible for an e-Visa need to apply for a **regular** visa where use of the online form is mandatory. After submitting the application online, including digital facial image, the form should be printed, signed and submitted at the consulate or VAC together with the supporting documents and payment of visa fee (for locations where e-payment is not available). The travel document is withheld for the purpose of affixing the visa sticker and can be collected from the consulate or Visa Application Centre or sent by post after the application has been processed. The status of a visa application can be checked online with a visa enquiry tool.

**Russian Federation**

The Russian Federation introduced its first electronic visa (e-Visa) in 2017. It could be granted to foreign nationals from 18 countries to visit selected regions in the country**.** It allowed a single entry (for business, tourism or a humanitarian visit) for a maximum term of 8 days to travel to the far eastern regions of the country. In 2019 the territorial validity was expanded to Kaliningrad and Saint Petersburg and the number of eligible countries extended to 53 (including EU/EEA-countries (except UK) and Switzerland). The **Unified eVisa** was launched early this year as part of the Russian 'Digital Economy' plan. It is a single entry visa valid for the entire territory of the Russian Federation, for a stay up to 16 days. The electronic visa will be issued electronically and sent to the applicant by email. It is expected that Unified eVisas will come into full force by the end of 2021 for the same 53 eligible countries.

Foreign nationals not eligible for an eVisa, need to apply for a regular visa. This application procedure is not digitalised; applicants must visit the consulate to submit their application in paper. This visa is issued in the form of a sticker to be affixed in the travel document.

**United Kingdom**

Foreign nationals who are subject to the visa requirements must apply for a standard Visitor visa. The application procedure was digitalised in 2016 as part of the 'Government Digital Services'. Applying for a standard visitor visa can be done online but for identification purposes, collection of biometrics and submitting supporting documents, applicants need to book an appointment at the VAC. The visa is issued in the form of a sticker. If the applicant had to leave his/her passport behind, it will be returned by VAC by post otherwise the applicant will need to take it to the VAC to collect the visa.

Under the Electronic Visa Waiver (EVW) program, introduced in 2014, passport holders of three visa required countries are allowed to visit the UK without a visa for the purpose of tourism, business, study or medical treatment. Applying for an EVW is fully digital and quicker than applying for a visa. It is issued electronically and needs to be shown upon arrival.

Visa-exempt nationalities (including EU/EEA-countries and Switzerland) can stay for short visits in the UK without a visa.

**United States**

All foreign nationals travelling to the United States for a short stay must obtain a **non-immigrant** visa. Applications for a **non-immigrant** visa can be initiated online but after submitting the application online, applicants are required to schedule an appointment for an interview at a US embassy or consulate. They will need to bring their travel document and have their biometrics enrolled. Visas are issued in the form of a sticker and affixed to the travel document which is returned by courier.

Under the Visa Waiver Program the US has waived the visa requirement for 39 countries, including citizens of the EU, EEA and Switzerland. Since 2009 however, nationals from these countries have to apply for an **ESTA** (Electronic System for Travel Authorization) to be pre-screened prior to travel. A system equal to ETIAS.

## ANNEX 6 – SENSITIVITY ANALYSIS ON THE PREFERRED OPTION

Sensitivity analysis can be referred to as "what if" analysis and looks at how changes in a variable can change the result of the impact assessment. The impact analysis becomes more uncertain with time – meaning that what is estimated today as the expected costs may be influenced by a number of future external factors such as the political or legal context, the evolution of largescale information systems, changes in the visa process or by technological advancement.

The sensitivity analysis for the preferred option (Option 4) has been approached with the following questions:

- What if the expected number of visa applications changes?
- What if the implementation of the digital visa platform is delayed?
- What if the benefits of digitalisation are achieved gradually (i.e. not to their full extent in 2025)?
- What if the average time to process a visa application is higher or lower?

These questions are very much inter-related. In the analysis on the potential impact time may have on the costs and benefits associated with the platform, the main variable impacted is the number of visa applications. As it is assumed that between 2025-2029 the number of visa applications is on average 17.8 million per year, over time this might increase or decrease depending on unforeseen factors. Therefore, the potential impact of average positive and negative application growth rates per Member State in the period 2025-2029 is assessed.

As applying the average positive and negative growth rates per country results overall in a lower number of applications for the reference period – approximately 95 million instead of 100 million - the analysis assuming that the number of applications increases overall by 5% for the given period have been also conduced. This analysis is presented in Sections 1 and Section 2.

Section 3 presents a sensitivity analysis assuming that the roll-out of the EU platform is delayed.

Section 4 present a sensitivity analysis on the average time spent by consulate staff to process a paper visa application, which affects the overall cost savings by Member States.

**Finally, Section 5 starts from the assumption that the EU platform will not deliver its benefit for Member States and third country nationals right at the start, and that the amount of benefits will gradually increase over the 2025-2029 period.**

### 1. Decrease in number of visa applications

In the current baseline scenario, it is estimated that the number of visa applications per year stabilises at 17.8 million per year.

**Impact on EU tourism and GDP**

Changing the number of visa applications from a stable 17.8 million per year to 16.9 over the 2025-2029 period, the net benefits in EU tourism and travel would decrease approximately by EUR 0.5 billion the amount of extra GDP generated by digitalisation.

***Table 24**: Example impact of a decrease in visa applications on EU tourism and GDP*

| | Main assumption (17.8 million applications per year) | Sensitivity (16.9 million applications per year) |
|---|---|---|
| Baseline contribution 2025-2029 | EUR 411.4 billion | EUR 401.1 billion |
| Extra GDP | EUR 19.1 billion | EUR 18.6 billion |

**Impact on technical costs**

The number of visa applications directly affects the technical costs of the platform. It is important to note that the digital application platform, as estimated in this study, is scaled to hold 100 million applications. This is based on a 'safety net' on top of the assumption that the number of yearly applications will stabilise at 17.8 million per year and the retention period of these application files is five years.

A deviation in the number of applications does not affect all technical cost categories. For example, the system retains the same features but the infrastructure on which it is hosted would change. If a lower number of visa applications need to be considered, the load on the system will decrease and the storage provisions need to be re-evaluated.

Therefore, a decrease in the number of applications leads to a reduction in the infrastructure costs at national and central level. All other costs of the digital application platform remain the same. As described in previous analysis, the infrastructure costs are linear to the number of applications the application platform needs to cover. For example, if the number of applications drop by 1% (1 million[158]), the infrastructure costs would be 1% lower.

Please note that this decrease in applications needs to be considered across a period of five years. For example, if in one year in a five year period there are 1 million applications less than the assumed 17.8 million yearly, it has the same effect as five consecutive years with around 200 000 applications less.

The table below illustrates these impacts in the situation where there is a reduction in visa applications compared to the hypothetical 20 million yearly applications taken into account for scaling the IT costs, e.g. 19 million applications per year. Please note that this only covers the infrastructure costs, all other cost categories remain unaffected.

***Table 25**: Example impact of a decrease in visa applications on technical costs*

| **Infrastructure & Hardware costs** | **Main assumption for IT costs (20 million applications per year)** | | **Sensitivity (19 million per year)** | |
|---|---|---|---|---|
| | Lower bound (EUR) | Upper bound (EUR) | Lower bound (EUR) | Upper bound (EUR) |
| **One-off costs** | | | | |
| **Central** | 11.3 million | 13.8 million | 10.7 million | 13.1 million |

[158] A 1% reduction in applications corresponds to 1 million applications as the platform is provisioned to hold 100 million applications.

| Infrastructure & Hardware costs | Main assumption for IT costs (20 million applications per year) | | Sensitivity (19 million per year) | |
|---|---|---|---|---|
| | Lower bound (EUR) | Upper bound (EUR) | Lower bound (EUR) | Upper bound (EUR) |
| **National (total)** | 61.6 million | 75.3 million | 58.5 million | 71.5 million |
| **National (per Member State)** | 2.5 million | 3.0 million | 2.4 million | 2.9 million |
| **Recurring costs** | | | | |
| **Central** | 1.7 million | 2.1 million | 1.6 million | 2.0 million |
| **National (total)** | 9.2 million | 11.3 million | 8.7 million | 10.7 million |
| **National (per Member State)** | 380 000 | 450 000 | 360 000 | 430 000 |

**Impact on administrative costs for Member States**

The table below shows the extent of administrative costs and benefits for Member States if the total number of applications decreased from the baseline scenario (17.8 million applications per year) to 16.9 million applications per year.

***Table 26**: Impact on administrative costs of a stable number of visa applications (16.9 million)*

| | Main assumption (17.8 million applications per year) | Sensitivity (16.9 million applications per year) |
|---|---|---|
| **Processing visa applications** | | |
| Cost of processing visa applications under O4 | 398 FTEs / EUR 17.5 million | 379 FTEs / EUR 16.7 million |
| Benefit of processing visa applications compared to baseline | 867 FTEs saved / EUR 38.2 million saved | 825 FTEs saved / EUR 36.3 million saved |
| **Capturing biometrics** | | |
| Cost of capturing biometrics under O4 | 438 FTEs / EUR 19.3 million | 417 FTEs / EUR 18.3 million |
| Extra resources for capturing biometrics compared to baseline | 20 extra FTEs needed / EUR 0.9 million | 19 extra FTEs needed / EUR 0.85 million |
| **Replying to queries** | | |
| Cost of replying to queries under O4 | 635 FTEs / EUR 27.9 million | 604 FTEs / EUR 26.6 million |
| Benefit of replying to queries compared to baseline | 576 FTEs saved / EUR 25.3 million saved | 548 FTEs saved / EUR 24.1 million saved |
| **Archiving visa applications** | | |

| | | |
|---|---|---|
| Cost of archiving visa applications staff under O4 | 138 FTEs / EUR 6.1 million | 131 FTEs / EUR 5.8 million |
| Benefit of archiving visa applications staff compared to baseline | 4 248 FTEs saved / EUR 186.9 million | 4 043 FTEs saved / EUR 177.9 million saved |
| Cost of resources for archiving visa applications under O4 | EUR 0.13 million | EUR 0.12 million |
| Benefit related to resources for archiving visa applications compared to baseline | EUR 4.5 million saved | EUR 4.48 million saved |
| **Visa stickers** | | |
| Cost of managing visa stickers staff under O4 | EUR 0 | EUR 0 |
| Benefit of managing visa stickers staff compared to baseline | 4 014 FTEs saved / EUR 176.6 million saved | 3 829 FTEs saved / EUR 168.4 million saved |
| Cost of managing visa stickers resources under O4 | EUR 0 | EUR 0 |
| Benefit of managing visa stickers resources compared to baseline | EUR 80.3 million saved | EUR 76.6 million saved |
| **Totals** | | |
| Total average cost admin burden under O4 | 1 609 FTEs / EUR 70.9 million | 1 531 FTEs / EUR 67.5 million |
| Total average benefit admin burden compared to baseline | 9 685 FTEs saved / EUR 510.9 million saved | 9 226 FTEs saved / EUR 487 million saved |

**Impact on third country nationals**

The table below shows the extent of costs and benefits for third country nationals if the total number of applications decreased from the baseline scenario (17.8 million applications per year) to 16.9 million applications per year.

***Table 27**: Impact of a stable number of visa applications on costs and benefits for third country nationals*

| | Main assumption (17.8 million applications per year) | Sensitivity (16.9 million applications per year) |
|---|---|---|
| Total cost for TCNs under O4 | EUR 4 billion | EUR 3.8 billion |

| | Main assumption (17.8 million applications per year) | Sensitivity (16.9 million applications per year) |
|---|---|---|
| Total benefit for TCNs compared to baseline | EUR 2.9 billion | EUR 2.7 billion |

## 2. Increase in number of visa applications

### Impact on EU tourism and GDP

Changing the number of visa applications from a stable 20 million per year to a growth of 5% in applications – 105 million - the net benefits in EU tourism and travel would generate a positive difference of approx. EUR 3 billion.

***Table 28**: Example impact of an increase in visa applications on EU tourism and GDP*

| | **Main assumption (17.8 million applications per year)** | **Sensitivity (20 million applications per year)** |
|---|---|---|
| **Total GDP contribution 2025-2029** | EUR 411.4 | EUR 481.6 billion |
| **Extra GDP contribution** | EUR 19.1 | EUR 53.5 billion |

### Impact on technical costs

Similar to a decrease in the number of visa applications, an increase of visa applications would also lead to an increase in the infrastructure needed. The reasoning is similar to the one described in the previous analysis. Also here we consider the hypothetical 20 million applications used to scale the IT costs. For example, if the number of applications increase by 1% (1 million)[159], the infrastructure costs would be 1% higher.

Please note that the 20 million applications is different from the number of applications used to estimates other than technical. This is because the VIS will be scaled to 100 million applications[160] so technically it makes sense to scale the application platform in line with the VIS. This can be considered a technical 'safety net' for future growth.

***Table 29**: Example impact of an increase in visa applications on technical costs*

| **Infrastructure & Hardware costs** | **Main assumption including 'safety net' (20 million applications per year)** | | **Sensitivity (21 million per year)** | |
|---|---|---|---|---|
| | Lower bound (EUR) | Upper bound (EUR) | Lower bound (EUR) | Upper bound (EUR) |
| **One-off costs** | | | | |
| **Central** | 11.3 million | 13.8 million | 11.9 million | 14.5 million |
| **National (total)** | 61.6 million | 75.3 million | 64.7 million | 79.1 million |

[159] A 1% reduction in applications corresponds to 1 million applications as the platform is provisioned to hold 100 million applications.
[160] 20 million per year with a 5 year retention period.

| Infrastructure & Hardware costs | Main assumption including 'safety net' (20 million applications per year) | | Sensitivity (21 million per year) | |
|---|---|---|---|---|
| | Lower bound (EUR) | Upper bound (EUR) | Lower bound (EUR) | Upper bound (EUR) |
| **National (per Member State)** | 2.5 million | 3.0 million | 2.6 million | 3.1 million |
| **Recurring costs** | | | | |
| **Central** | 1.7 million | 2.1 million | 1.8 million | 2.2 million |
| **National (total)** | 9.2 million | 11.3 million | 9.7 million | 11.9 million |
| **National (per Member State)** | 380 000 | 450 000 | 400 000 | 470 000 |

### 3. Delay in the roll-out of the application platform

The third and final sensitivity analysis topic is the possibility that the application platform is delayed. Unlike the other two topics, this topic is described in a qualitative way.

This is necessary as the delay of the platform impacts neither the costs nor the benefits. The costs and benefits described in this impact assessment start when the application platform goes live. Therefore, delaying the roll-out simply means shifting these costs and benefits as well.

There are two caveats that must be considered when interpreting the above statement:

- First, the technology costs are based on the currently existing technologies and market trends. While these would probably still be representative a few additional years down the line, the longer the roll-out is delayed, the less accurate these estimations will become.
- Secondly, if the roll-out is delayed substantially, there could be other central initiatives developed in the meantime that could be leveraged. These synergies would drive the costs down.
- The sensitivity analysis concludes that the costs and benefits presented in this report will therefore remain, to some extent, relevant if the roll-out is delayed.

There is however one potential impact, related not to the costs and benefits, but to the identification of the preferred option itself. If the roll-out of the application platform is delayed considerably, Member States would likely continue to invest in (or create new) national application portals. The more Member States invest in their own national solutions, the less likely it is they will then pivot to the EU digital application platform. Therefore, the risk exists that if the roll-out of the platform is delayed multiple years, the adoption of a mandatory EU digital application platform will be hindered significantly from a political or governance point of view.

### 4. Change in time needed to intake a visa application

Administrative costs and benefits for Member States are calculated based on the average time spent to carry out the various tasks when processing visa applications. The assumption was used as to the time

needed to process applications are averages based on data provided by Member States. As the actual time spent may vary across consulates and Member States, it is useful to estimate how the administrative costs and benefits would change if the average time spent decreased or increased.

The sensitivity analysis has been applied only to the "time to process visa application", which includes intake of the application at the counter, encoding it and collecting the visa fee. The average time per application assumed in this study for this sub-task is 15 minutes. The reason to apply the sensitivity only to this sub-task of the process is the significant variability between the time data provided by the Member States in that regard: with the sensitivity analysis the study can cater for a wider range of cases, i.e. cases whereby intaking one application takes more or less time.

**Increase in time needed to intake a visa application**

In this section the impact on administrative costs and benefits of increasing the average time for intake of an application from 15 to 18 minutes is shown.

The table below shows the impact on the costs in the baseline scenario and under the preferred option, always applying (a) the assumption that consulates only process 10% of all visa applications; and (b) the assumption that at least 3% of third country nationals will continue to use the paper application process. The table shows that if the average time to intake one visa application was 18 minutes, under the baseline scenario Member States would need around 285 more FTEs to process the same amount of applications (corresponding to approximately EUR 12.5 million more). Under the preferred option the number of FTEs needed would increase by 10, but Member States would also save an additional share of FTEs (i.e. around 275) that they would have allocated to cope with the higher amount of applications expected between 2025 and 2029 compared to the baseline.

The same reasoning would apply to the monetary costs of FTEs: under the preferred option, Member States would see the total monetary cost of FTEs increase by EUR 0.4 million, but compared to the baseline the amount of FTEs saved would correspond approximately to EUR 12 million.

***Table 30**: Example impact of a decrease in the processing time for visa applications on administrative costs for Member States (baseline)*

| | **Main assumption (15 minutes per application)** | **Sensitivity (18 minutes per application)** |
|---|---|---|
| | **Baseline** | |
| FTEs spent on intaking & encoding all visa applications, and collecting visa fee | 1 265 | 1 518 |
| Cost for all visa applications | EUR 55.7 million | EUR 66.8 million |
| | **Preferred option** | |

| | | |
|---|---|---|
| FTEs spent on intaking & encoding all visa applications, and collecting visa fee | 398 | 438 |
| FTEs saved under the preferred option | 867 | 1 041 |
| Cost for all visa applications | 17.5 million | EUR 21 million |
| Costs saved under the preferred option | 38.1 million | 45.8 million |

**Decrease in time needed to intake a visa application**

In this section the impact on administrative costs and benefits of decreasing the average time for intaking an application from 15 to 12 minutes is shown.

The table below shows the impact on the costs in the baseline scenario: if the average time to intake one visa application was 12 minutes, Member States would need approximately 286 less FTEs to process the same amount of applications (corresponding to approximately EUR 12.5 million less). Under the preferred option the number of FTEs needed would decrease by 10, and their corresponding costs would decrease by EUR 0.4 million.

***Table 31**: Example impact of a decrease in the processing time for visa applications on administrative costs for Member States*

| | **Main assumption (15 minutes per application)** | **Sensitivity (12 minutes per application)** |
|---|---|---|
| | **Baseline** | |
| FTEs spent on taking in & encoding all visa applications, and collecting visa fee | 1 265 | 1 012 |
| Cost for all visa applications | EUR 55.7 million | EUR 44.5 million |
| | **Preferred option** | |
| FTEs spent on taking in & encoding all visa applications, and collecting visa fee | 398 | 318 |
| FTEs saved under the preferred option | 867 | 694 |
| Cost for all visa applications | 17.5 million | 14 million |

| | | |
|---|---|---|
| Costs saved under the preferred option | 38.1 million | 30.5 million |

## 5. Gradual realisation of administrative benefits over the 2025-2029 period

In the main scenario it was assumed that from the start of the implementation of the platform, only 3% of applications would still be submitted to the consulate on paper. However, if the benefits of the digitalisation take longer to be realised by Member States, due to e.g. time for adoption of processes and adjusting to new ways of working, there would be a reduced benefit overall during the 5 year period.

Below the impact of a gradual implementation of the digital way of working i.e. with 8% of applications still being assessed in paper in the first year and 5% in the second year have been calculated. From the third year it is assumed that the proportion would stabilise at 3%.

***Table 32**: Sensitivity analysis on the administrative impact of gradual adoption of the digital way of working*

| Costs saved | Main scenario (3% of applications submitted on paper)[161] | Gradual adoption scenario (8%, 5%, 3%) |
|---|---|---|
| **Processing visa applications** | | |
| **FTEs** | 867 | 685 |
| **Costs in EUR** | 38 152 138 | 30 157 407 |
| **Capturing biometrics** | | |
| **FTEs** | -20 | -20 |
| **Costs in EUR** | -896 556 | -896 556 |
| **Replying to queries** | | |
| **FTEs** | 576 | 576 |
| **Costs in EUR** | 25 331 556 | 25 331 556 |
| **Archiving visa applications** | | |
| **FTEs** | 4 248 | 4 185 |
| **Costs of staff in EUR** | 186 908 404 | 184 136 897 |
| **Costs of resources in EUR** | 4 471 088 | 4 412 246 |
| **Managing visa stickers** | | |
| **FTEs** | 4 014 | 4 014 |
| **Costs of staff in EUR** | 176 635 361 | 176 635 361 |
| **Costs of resources in EUR** | 80 322 606 | 80 322 606 |
| **TOTALS** | | |
| **Total FTEs saved (all MSs)** | **9 685** | **9 440** |
| **Total costs saved in EUR (all MSs)** | **510 924 598** | **500 099 518** |

[161] 17.8 million applications per year.

| | | |
|---|---|---|
| **Total FTEs saved (average per MS)** | **372** | **363** |
| **Total costs saved in EUR (average per MS)** | **19 650 946** | **19 234 597** |

As shown above, the expected time saved due to the use of the EU digital platform would be reduced by about 23%. Although the benefit is reduced, the result of the sensitivity is not significant. For Member States overall, even with a period of time required to adapt to the digital process, the expected benefits may decrease by only about 2-3%.

## ANNEX 7 – COMPARISON OF THE POLICY OPTIONS

This annex presents the main findings from the assessment of the impacts of each policy option.

*Due to rounding, some totals may not correspond with the sum of the separate figures.*

### Option 2: Minimal EU legislative changes on the application & digital visa

***Table 33**: Assessment of Option 2*

<table>
<tr><th rowspan="2">Criteria</th><th colspan="3">Assessment Option 2</th></tr>
<tr><th>Rating</th><th colspan="2">Summary</th></tr>
<tr><td>Effectiveness</td><td>1.1</td><td>Objectives</td><td>Rating</td></tr>
<tr><td></td><td></td><td>To streamline and make more efficient the visa application procedure for applicants and MS through digital means</td><td>1,25</td></tr>
<tr><td></td><td></td><td colspan="2">Under Option 2 the EU would issue EU-wide mandatory standards for Member States operating an online application portal. This would ensure widespread adoption, considering that by 2029 the majority of Member States are expected to be operating a portal. Moreover, the digital visa would mark a transition to a seamless, digital proof of visa in line with ETIAS. Therefore, under Option 2 there would be a higher contribution to the digitalisation of public services, although the level of digitalisation would still depend on the nature of the functionalities offered by the Member States.<br>The EU-wide mandatory standards would contribute to a certain extent to simplify the application process. Moreover, the removal of the obligation to sign the application would allow repeat applicants to apply online. However, the overall effect would still be limited because the visa process would continue to be based on national administrative practices and systems.</td></tr>
<tr><td></td><td></td><td>To increase the security of the Schengen area through the digitalisation of the visa sticker and digitalised application procedures</td><td>1.75</td></tr>
<tr><td></td><td></td><td colspan="2">Thanks to the digital visa, Option 2 would contribute to a certain extent to the security of the Schengen Area, by streamlining border checks in line with interoperability and by removing the visa sticker, which is prone to forgery. However, visa shopping would still be a problem, albeit to a lesser extent than under Options 0 and 1.</td></tr>
<tr><td></td><td></td><td>Impact on the environment</td><td>0.25</td></tr>
<tr><td></td><td></td><td colspan="2">O2 would enable saving 38% of the CO2 emitted by third country nationals travelling to consulates/VACs, 50% of the paper needed for visa applications, and all paper used for visa stickers.</td></tr>
<tr><td>Efficiency</td><td>1.5</td><td>GDP contribution of travel</td><td>No impact</td></tr>
<tr><td></td><td></td><td>Cost for EU institutions and bodies</td><td>One-off IT costs: EUR 3.5 million – EUR 6.4 million</td></tr>
</table>

| Criteria | Assessment Option 2 | | |
|---|---|---|---|
| | Rating | Summary | |
| | | | Yearly IT costs[162]: **EUR 3.5 million – EUR 6 million** |
| | | Costs savings for Member States (2025-2029) | Time needed to process visa applications (all Member States): **No impact**<br>Cost to process visa applications (all Member States): **No impact** |
| | | | Time needed to reply to queries (all Member States): **No impact**<br>Cost needed to reply to queries (all Member States): **No impact** |
| | | | Time needed to file paper applications in the archive (all Member States): **No impact**<br>Cost needed to file paper applications in the archive (all Member States): **No impact** |
| | | | Time needed to capture biometrics (all Member States): **No impact**<br>Cost needed to capture biometrics (all Member States): **No impact** |
| | | | Cost for archiving visa applications and supporting documents for 2 years (all Member States): **No impact** |
| | | | Cost saved on procuring, transporting and storing visa stickers: **EUR 80.3 million** |
| | | | Time saved on printing the visa sticker and affixing it to the passport/travel document (all Member States): **4 014 FTEs**<br>Cost saved on staff for visa stickers (all Member States): **EUR 176.6 million** |
| | | Cost savings for third country nationals (2025-2029) | Cost savings associated with the application process and pick-up (per applicant): **EUR 31**<br>Total cost savings associated with the application process and pick-up (all applicants): **EUR 2.7 billion** |
| | | Environmental impacts (2025-2029) | Total decrease in $CO^2$ emission (application and pick-up): **1.5 million kg** |
| | | | Paper saved in regard to the digitalisation of the application process**: 2.6 million kg in paper** |
| | | | Total $CO^2$ emission related to travel to the EU: **No impact** |

[162] After entry-in-operation of the digital application platform.

| Criteria | Assessment Option 2 | |
|---|---|---|
| | Rating | Summary |
| **Protection of personal data** | **0.5** | Under Option 2 mandatory standards may enhance monitoring of compliance and legal certainty, positively contributing to data subjects' trust in the data processing. Exposure of personal data to ESPs would be reduced. The web service would entail data security implications that need to be mitigated via a "privacy enhancing" implementation. |
| **Coherence with EU Charter of Fundamental Rights** | **0** | Option 2 would still guarantee a high level of compliance with the EU Charter of Fundamental Rights. People with low IT literacy and people with disabilities applying from distance may need technical assistance to use online portals, but the assistance provided by family members & friends, service providers and consulates would be sufficient to guarantee protection and inclusion. Repeat applicants with reduced mobility would be able to apply with no need to visit a consulate/VAC. There would be a risk for the rights of the child as minors repeat applicants would normally not be checked by consulate or ESP staff to detect instances of child abduction and trafficking in human beings. |
| **Overall conclusion** | Option 2 would achieve the policy objectives to a wider extent, although it would not simplify and harmonise the visa process to the required extent. In terms of efficiency, Option 2 would enable some cost savings and efficiency gains for Member States and third country nationals. | |

## Option 3: Optional EU digital application platform & digital visa

***Table 34**: Assessment of Option 3*

| Criteria | Assessment Option 3 | | |
|---|---|---|---|
| | Rating | Summary | |
| **Effectiveness** | **1.6** | **Objectives** | **Rating** |
| | | *To streamline and make more efficient the visa application procedure for applicants and MS through digital means* | *2* |
| | | With the introduction of the EU digital application platform, Option 3 would mark a clear transition towards an effective digitalisation of public services, contributing to making the EU fit for the digital age. However, the impact of Option 3 is still suboptimal because the optional nature of the EU application platform is expected to generate uncertainty amongst third country nationals on the tool to use to apply and whether the Member States still operating a national system are part of the Schengen Area. Hence, Option 3 would contribute only to a limited extent to making the Schengen Area more attractive to travellers.<br>For the Member States joining the EU platform Option 3 would contribute to a large extent to simplifying and harmonising the visa process, by enabling seamless application procedures for repeat applicants. However, third country nationals applying for Member States operating a national system may not enjoy the same benefits and the extent to which the fragmentation of the application tools and procedure would be addressed by this option is very hypothetical | |
| | | *To increase the security of the Schengen area through the digitalisation of the visa sticker and digitalised application procedures* | *2* |

| Criteria | Assessment Option 3 | | |
|---|---|---|---|
| | Rating | Summary | |
| | | The Member States operating the EU platform are expected to save FTEs that can be re-allocated to strengthen the risk assessment process, thereby contributing to the EU security. However, visa shopping would still be possible as some Member States would offer a more expeditious process than others. The impact of the digital visa would be the same as under Option 2. Therefore, Option 3 would contribute to a significant extent to EU security. | |
| | | *Impact on the environment* | *0.75* |
| | | Under 03, 38 % of the CO2 emissions emitted by third country national travelling to consulates or VACs would be saved. Due to the introduction of the platform and the digitalisation resulting from it, additional paper would be saved in comparison with O2. The potential/hypothetical increase of travellers linked to simplification of the application process through digitalisation would be limited with also limited extra emissions of CO2. | |
| **Efficiency** | **1.6** | GDP contribution of travel (2025-2029) | **EUR 8.7 billion** |
| | | Cost for EU institutions and bodies (2025-2029) | One-off IT costs: **EUR 25.7 million – EUR 31.3 million**[163]<br>Recurring IT costs: **EUR 44.5 million – EUR 54.4 million**[164]<br>One-off training costs: **EUR 20 000 – EUR 33 000**<br>Development support staff: **EUR 2.5 million** |
| | | Costs for Member States (2025-2029) | One-off IT costs (average per Member State): **EUR 2.0 million – EUR 2.3 million**[165]<br>One-off IT costs (all Member States): **EUR 30.9 million – 37.7 million** |
| | | | Recurring IT costs (average per Member State): **EUR 1.7 million – EUR 2.1 million**<br>Recurring IT costs (all Member States): **EUR 27.5 million – EUR 33.5 million** |
| | | | One-off training costs (average per Member State): **EUR 33 000**<br>One-off training costs (all Member States): **EUR 528 000** |
| | | | Extra time needed to capture biometrics (all Member States): **4 FTEs**<br>Extra cost needed to capture biometrics (all Member States): **EUR 0.4 million** |
| | | Cost savings for Member States (2025-2029) | Time saved on processing visa applications (all Member States): **448 FTEs** |

[163] Taking into account the costs associated with the EU platform.
[164] Idem, after entry-in-operation of the digital application platform.
[165] Taking into account the number of Member States expected to join the EU platform under Option 3.

| Criteria | Assessment Option 3 | | |
|---|---|---|---|
| | Rating | Summary | |
| | | | Cost saved on processing visa applications (all Member States): **EUR 19.7 million** |
| | | | Time saved on replying to queries (all Member States): **236 FTEs**<br>Cost saved on replying to queries (all Member States): **EUR 10.4 million** |
| | | | Time saved on filing paper applications in the archive (all Member States): **1 724 FTEs**<br>Cost saved on filing paper applications in the archive (all Member States): **EUR 75.8 million** |
| | | | Cost saved on archiving visa applications and supporting documents for 2 years (all Member States): **EUR 1.8 million** |
| | | | Cost saved on procuring, transporting and storing visa stickers: **EUR 80.3 million**<br>Yearly cost savings on resources for visa stickers (average per Member State): **EUR 3.1 million** |
| | | | Time saved on printing the visa sticker and affixing it to the passport/travel document (all Member States): **4 014 FTEs**<br>Time saved on printing the visa sticker and affixing it to the passport/travel document (average per Member State): **154 FTEs**<br>Cost saved on staff for visa stickers (all Member States): **EUR 176.6 million**<br>Cost saved on staff for visa stickers (average per Member State): **EUR 6.8 million** |
| | | Cost savings for third country nationals (2025-2029) | Cost savings associated with the application process and pick-up (per applicant): **EUR 31**<br>Total cost savings associated with the application process and pick-up (per applicant): **EUR 2.7 billion**[166] |
| | | Environmental impacts (2025-2029) | Total decrease in $CO^2$ emission related to travel during the application process and pick-up: **1.5 billion kg** |
| | | | Paper saved in regard to the digitalisation of the application process**: 3.1 million kg** |
| | | | Extra $CO^2$ emission related to travel to the EU: **0.8 billion kg** |

[166] Taking into account the expected increase in the total number of visa applicants under Option 3.

| Criteria | Assessment Option 3 | |
|---|---|---|
| | Rating | Summary |
| **Protection of personal data** | **0.75** | Under Option 3 the EU platform would introduce uniform data processing practices that would however apply only to a subset of Member States. While less third country nationals will rely on ESPs, the new processing to enhance identification of visa applicants for consulates would expose additional personal data to ESPs. The EU platform would entail data security implications for data stored online to be mitigated via a "privacy enhancing" implementation. |
| **Coherence with EU Charter of Fundamental Rights** | **0** | Option 3 would be compliant with the EU Charter of Fundamental Rights. A higher share of elderly people and people with low IT literacy is expected to need technical assistance compared to Option 2; however, the necessary assistance would continue to be provided. Repeat applicants with reduced mobility would be able to apply with no need to visit a consulate/VAC. There would be a risk for the rights of the child as minors repeat applicants would normally not be checked by consulate or ESP staff to detect instances of child abduction and trafficking in human beings. |
| **Overall conclusion** | Option 3 would perform better than Option 2 in all departments. It would go an extra step in simplifying and harmonising the visa process, although the optional EU platform is a key limitation and drawback in terms of attractiveness and simplification of procedures for third country nationals. In terms of efficiency, Option 3 would require substantial one-off and yearly investments from the EU and the participating Member States, but would produce higher long-term cost savings and efficiency gains for Member States and third country nationals compared to Option 2. | |

## Option 4: Mandatory EU digital application platform & digital visa

***Table 35**: Assessment of Option 4*

| Criteria | Assessment Option 4 | | |
|---|---|---|---|
| | Rating | Summary | |
| **Effectiveness** | **1.9** | **Objectives** | **Rating** |
| | | *To streamline and make more efficient the visa application procedure for applicants and MS through digital means.* | *2.6* |
| | | As it would be mandatory for all Member States, the EU platform under Option 4 would bring the same high level of simplification and harmonisation of the visa process for all third country nationals. Repeat applicants would be able to apply in a seamless way from home, and all Member States would reap the benefits of a digital landscape enabling a level playing field.<br>The EU digital application platform under Option 4 would make the common visa process truly digital in all Member States, thereby contributing to a large extent to EU-wide digitalisation of public services. This would also increase the coherence of the EU image vis-à-vis third countries in line with worldwide digital trends, thereby making the Schengen Area more attractive to foreign travellers. | |
| | | *To increase the security of the Schengen area through the digitalisation of the visa sticker and digitalised application procedures* | *2.5* |

| Criteria | Assessment Option 4 | | |
|---|---|---|---|
| | Rating | Summary | |
| | | Under Option 4 all Member States could strengthen their risk assessments by re-allocating resources saved. Moreover, as the application process would be harmonised to a large extent, visa shopping would be significantly reduced. The digital visa would contribute to the security of border checks as under Options 2 and 3. In addition, all documents submitted would be subject to the same quality standards. Therefore, Option 4 would contribute to a large extent to EU security. | |
| | | *Impact on the environment* | *0.5* |
| | | Almost the same benefits than under O3 would materialise under O4 (paper savings and decrease of travels required for applications of third country nationals). The additional emissions involved by a possible higher number of travellers triggered by a single and simplified digital application would be higher than under O3, thus triggering a lower score than O3. The score remains positive, as the benefits are certain (reduction of paper and decrease of applicant travels) whereas the environmental costs remain hypothetical as based on a potential increase of travellers. | |
| **Efficiency** | **2.25** | GDP contribution of travel (2025-2029) | **EUR 19.1 billion** |
| | | Cost for EU institutions and bodies (2025-2029) | One-off IT costs: **EUR 33.8 million – EUR 41.2 million**[167]<br>Recurring IT costs: **EUR 52.5 million – EUR 63.9 million**<br>One-off training costs: **EUR 20 000 – EUR 33 000**<br>Development support staff: **EUR 2.5 million** |
| | | Cost for Member States (2025-2029) | One-off IT costs (average per Member State): **EUR 2.8 million – EUR 3.3 million**<br>One-off IT costs (all Member States): **EUR 68.3 million – EUR 83.5 million** |
| | | | Recurring IT costs (average per Member State): **EUR 2.3 million – EUR 2.9 million**<br>Recurring IT costs (all Member States): **EUR 58 million – EUR 70.5 million** |
| | | | One-off training costs (average per Member State): **EUR 33 000**<br>One-off training costs (all Member States): **EUR 858 000** |
| | | Costs for Member States (2025-2029) | Extra time needed to capture biometrics (all Member States): **20 FTEs**<br>Extra cost needed to capture biometrics (all Member States): **EUR 0.9 million** |

[167] Includes EU digital application platform and VIS adaptations.

| Criteria | Assessment Option 4 | | |
|---|---|---|---|
| | Rating | Summary | |
| | | Cost savings for Member States (2025-2029) | Time saved on processing visa applications (all Member States): **867 FTEs**<br>Cost saved on processing visa applications (all Member States): **EUR 38.2 million** |
| | | | Time saved on replying to queries (all Member States): **576 FTEs**<br>Cost saved on replying to queries (all Member States): **EUR 25.3 million** |
| | | | Time saved on filing paper applications in the archive (all Member States): **4 248 FTE**<br>Cost saved on filing paper applications in the archive (all Member States): **186.9 million** |
| | | | Cost saved on archiving visa applications and supporting documents for 2 years (all Member States): **EUR 4.5 million** |
| | | | Cost saved on procuring, transporting and storing visa stickers: **EUR 80.3 million** |
| | | | Time saved on printing the visa sticker and affixing it to the passport/travel document (all Member States): **4 014 FTEs**<br>Cost saved on staff for visa stickers (all Member States): **EUR 176.6 million** |
| | | Cost savings for third country nationals (2025-2029) | Cost savings associated with the application process and pick-up (per applicant): **EUR 31**<br>Total cost savings associated with the application process (all applicants): **EUR 2.9 billion**[168] |
| | | Environmental impacts (2025-2029) | Total decrease in $CO_2$ emission related to travel during the application process and pick-up: **1.4 billion kg**[169] |
| | | | Paper saved in regard to the digitalisation of the application process**: 3 million kg in paper**[170] |

[168] Taking into account the expected increase in the total number of visa applicants under Option 4.
[169] The amount of $CO_2$ emissions saved under Option 4 (net benefit) is lower than the amount saved under Option 3 (see table above) due to the fact that for all options this net benefit is calculated in function of the baseline $CO_2$ emissions. As Option 4 leads to slightly higher emissions because of the higher number of TCNs applying compared to Option 3, the resulting net benefit is lower for Option 4, given the same baseline.
[170] Idem.

| Criteria | Assessment Option 4 | | |
|---|---|---|---|
| | Rating | Summary | |
| | | | Extra $CO^2$ emission related to travel to the EU: **2.9 billion kg** |
| **Protection of personal data** | **1** | Under Option 4 the EU platform would introduce uniform data processing practices that would apply to all Member States that could produce substantial benefits in terms of training and harmonisation of the implementation of the data protection legal framework. While less third country nationals will rely on ESPs, the new processing to enhance identification of visa applicants for consulates would slightly expose additional personal data to ESPs. The EU platform would entail data security implications for data stored online to be mitigated via a "privacy enhancing" implementation. | |
| **Coherence with EU Charter of Fundamental Rights** | **0** | Option 4 would be compliant with the EU Charter of Fundamental Rights. A higher share of elderly people and people with low IT literacy is expected to need technical assistance compared to Option 3; however, the necessary assistance would continue to be provided. Repeat applicants with reduced mobility would be able to apply with no need to visit a consulate/VAC. There would be a risk for the rights of the child as minors repeat applicants would normally not be checked by consulate or ESP staff to detect instances of child abduction and trafficking in human beings. | |
| **Overall conclusion** | By extending the benefits of the EU platform to the whole Schengen Area, Option 4 would perform better than Option 3 in terms of effectiveness. In terms of efficiency, Option 4 would still require substantial one-off and yearly investments from the EU and from all Member States, but would also produce high long-term cost savings and efficiency gains for all Member States. | | |

## Option 5: Online biometric enrolment & digital visa

***Table 36**: Assessment of Option 5*

| Criteria | Assessment Option 5 | | |
|---|---|---|---|
| | Rating | Summary | |
| **Effectiveness** | **0.7** | **Objectives** | **Rating** |
| | | *To streamline and make more efficient the visa application procedure for applicants and MS through digital means* | *2.8* |
| | | By digitalising the whole application process even for first-time applicants, Option 5 would be the most suitable option to contribute to streamlining and make more efficient the visa application procedure for applicants and MS through digital means. While harmonising the process to the same extent as Option 4, Option 5 would enable a higher degree of simplification, in particular by allowing all third country nationals – including first-time applicants – to apply online. Both Member States and third-country nationals would reap the highest benefits in terms of efficiency gains and travel cost savings. | |
| | | *To increase the security of the Schengen area through the digitalisation of the visa sticker and digitalised application procedures* | *-0.5* |

| Criteria | Assessment Option 5 | | |
|---|---|---|---|
| | Rating | Summary | |
| | | The digital visa would contribute to EU security as under Options 2 to 4. However, the security of the visa application process would be diminished by the possibility for third country nationals to enrol biometrics online. This would prevent consulates and ESP staff from linking the applicant's identity data in person and would undermine the trust of border authorities in the upstream risk assessment of third country nationals. For this reason, Option 5 is expected to have a slightly negative impact on EU security compared to the baseline. | |
| | | *Impact on the environment* | *0.25* |
| | | The same benefits as O4 would materialise under O5 (paper savings and decrease of travels required for applications of third country nationals). Nevertheless the potential additional emissions involved by a possible higher number of travellers triggered by a totally dematerialised application tool would trigger more emissions than under O3 and O4 and therefore O5 gets a lower score than these two options. The score remains positive, as the benefits are certain (reduction of paper and decrease of applicant travels) whereas the environmental costs remain hypothetical as based on a potential increase of travellers. | |
| **Efficiency** | **2** | GDP contribution of travel (overall 2025-2029) | **EUR 38.9 billion** |
| | | Cost for EU institutions and bodies (overall 2025-2029) | One-off IT costs: **EUR 34.0 million – EUR 41.5 million**<br>Recurring IT costs: **EUR 52.5 million – EUR 64.4 million**<br>One-off training costs: **EUR 20 000 – EUR 33 000**<br>Development support staff: **EUR 2.5 million** |
| | | Cost for Member States (overall 2025-2029) | One-off IT costs (average per Member State): **EUR 2.8 million – EUR 3.3 million**<br>One-off IT costs (all Member States): **EUR 68.3 million – EUR 83.5 million** |
| | | | Recurring IT costs (average per Member State): **EUR 2.3 million – EUR 2.9 million**<br>Recurring IT costs (all Member States): **EUR 58.0 million – EUR 70.5 million** |
| | | | One-off training costs (average per Member State): **EUR 33 000**<br>One-off training costs (all Member States): **EUR 858 000** |
| | | Cost savings for Member States (2025-2029) | Time saved on processing visa applications (all Member States): **848 FTEs**<br>Cost saved on processing visa applications (all Member States): **EUR 37.3 million** |

| Criteria | Assessment Option 5 | | |
|---|---|---|---|
| | Rating | Summary | |
| | | | Time saved on capturing biometrics (all Member States): **287 FTEs**<br>Cost saved on capturing biometrics (all Member States): **EUR 12.3 million** |
| | | | Time saved on replying to queries (all Member States): **545 FTEs**<br>Cost saved on replying to queries (all Member States): **EUR 24 million** |
| | | | Time saved on filing paper applications in the archive (all Member States): **4 241 FTEs**<br>Cost saved on filing paper applications in the archive (all Member States): **EUR 186.6 million** |
| | | | Cost saved on archiving visa applications and supporting documents for 2 years (all Member States): **EUR 4.5 million** |
| | | | Cost saved on procuring, transporting and storing visa stickers: **EUR 80.3 million** |
| | | | Time saved on printing the visa sticker and affixing it to the passport/travel document (all Member States): **4 014 FTEs**<br>Cost saved on staff for visa stickers (all Member States): **EUR 176.6 million** |
| | | Cost savings for third country nationals (2025-2029) | Cost savings associated with the application process and pick-up (per applicant): **EUR 72**<br>Total cost savings associated with the application process and pick-up (all applicants): **EUR 6.9 billion**[171] |
| | | Environmental impacts (2025-2029) | Total decrease in $CO^2$ emission: **1.9 billion kg** |
| | | | Paper saved in regard to the digitalisation of the application process**: 2.9 million kg in paper** |
| | | | Extra $CO^2$ emission related to the uptake in tourism to the EU: **6.2 billion kg** |
| **Protection of personal data** | **-0.5** | Under Option 5 the EU platform would introduce uniform data processing practices that would apply to all Member States. While less third country nationals will rely on ESPs compared to Option 4, the new processing to enhance identification of visa applicants for consulates would expose additional personal data to ESPs. The EU platform would entail data security implications for data stored online to be mitigated via a "privacy enhancing" implementation; moreover, compared to Option 4, the online biometric enrolment would open up new privacy challenges, such as collection of (new) or additional sensitive data on mobile application, exposure of data to other (third) parties (i.e., app. provider-s-), the | |

[171] Taking into account the increase in the total number of visa applicants under Option 5.

| Criteria | Assessment Option 5 | |
|---|---|---|
| | Rating | Summary |
| | | internet and so on. This last element worsens the overall balance for O5 with regard to data protection. |
| **Coherence with EU Charter of Fundamental Rights** | **-0.5** | Option 5 would hardly guarantee overall compliance with the EU Charter of Fundamental Rights. The need for technical assistance for elderly people and people with low IT literacy is expected to be higher and impinge upon the rights of elderly people; on the other hand first-time applicants with reduced mobility would be able to apply with no need to visit a consulate/VAC. Importantly, Option 5 would entail a significant risk for the rights of the child, because consulates and ESP staff would normally have little to no chance to perform on-site checks to detect child abduction or trafficking of human beings. |
| **Overall conclusion** | Option 5 would make the EU fit for the digital age and simplify/harmonise the visa process more than any other option; however, it would fail to contribute to EU security, performing worse than Option 1 in this department. In terms of efficiency, Option 5 would require similar investments to Option 4 from the EU and the Member States, and would produce the highest cost savings for third country nationals. Its lack of transitional period and the online biometric enrolment are however likely to make it a politically unfeasible option. | |