

Carriers Working Group of 2 June 2025 Summary

Subject: Monthly Carriers Working Group meeting

Sea and Land Carriers at 10:00-12:00 CEST

Participants: Carriers representing sea and land industry, their declared service providers, carrier associations, European Commission (DG HOME), Member State (MS) experts, Frontex and eu-LISA (altogether 81 participants).

1. Introduction	eu-LISA presented the agenda of the 43 rd Carriers Working Group (CWG) to the participants.
a. Agenda	
b. Carriers	The CWG reviewed the schedule for the upcoming meeting, noting the date
meeting calendar	for the next session scheduled for July 3 rd , 2025.
2. Legal updates	The European Commission informed the community that a provisional
(European	agreement on the Regulation providing temporary derogation from certain
Commission)	provisions of the EES Regulation as regards a progressive start of
	operations of the EES was reached between the European Parliament and the Council of the European Union and it is expected to be adopted in mid-
	July 2025. Presenting the highlights of this provisional agreement, the
	Commission explained that the co-legislators preserved the objectives of the
	Commission's proposal. However, several targeted amendments with an operational impact have been introduced.
	One of the core elements of the provisional text concerns the progressivity speed. During the first phase, Member States are required to register in EES at least 10 % of the estimated border crossing in that Member State, followed by a second phase (by the 90 th calendar day from the first day of the progressive start of operations of the EES), the Member States shall register in EES at least 35% of the estimated number of border crossings. Member States will be required to register 100% of border crossings by the 170 th calendar day following the start of operations.
	Regarding the suspension mechanism, the provisional text allows Member States to suspend the use of the EES, or the registration of biometric data,



during the 180-day period of progressive start of operations of the EES. Member States will continue to be able to suspend the registration of biometric data in the EES after the end of the progressive start of operations for a limited period of 90 days (+60 days in certain circumstances). The suspensions can last for 6 hours, renewable if needed.

Another core element underlined by the Commission refers to the Member States' transparency towards the stakeholders. The community was informed about the new obligation for Member States when preparing the roll-out plans to inform the relevant operators of infrastructure hosting border crossing points where and how they plan to start operating the EES. Member States should also inform operators and carriers when the EES is suspended, if relevant according to the local circumstances.

Furthermore, the co-legislators agreed to ensure that third country nationals are informed of the possibility to use the short stay calculator tool available on the Commission's website during the progressive start of operations (https://home-affairs.ec.europa.eu/policies/schengen/border-crossing/short-stay-calculator_en).

The Commission reiterated the retro-planning for a start of operations of the EES in October 2025. In early June, the Commission expects the submission of the three remaining declarations of readiness by those Member States who have not yet declared their readiness, thus enabling the entry into force of the Regulation by mid-July which will be followed by the adoption of the Commission's decision on the EES start of operations date. Following that decision, the Member States will be able to finalise the last preparations (legal and technical). The Commission informed that the launch of the EES information campaign is planned for September 2025.

As for the impact on the transport industry, the Commission underlined that, the carriers may start using the web service from the 90th calendar day of the progressive start of operations of the EES on a voluntary basis. According to the provisional agreement, the carriers shall verify the stamps affixed in the travel documents for the duration of the progressive start of operations of the EES. Furthermore, for a period of 180 calendar days after the end of the progressive start of operations of the EES, the carriers shall, in addition to using the Carrier Interface, continue verifying the stamps affixed in the travel documents. Following questions from carriers related to the implementation of the Carriers' Liability Directive during the progressive period, the Commission clarified that the Regulation introducing the progressive start of operation of the EES establishes targeted derogations on the use of the EES but does not modify carriers obligations established in the Carriers' Liability Directive.

The Commission reiterated the topic of dual nationals with at least one EU nationality under ETIAS. It was explained that "dual national" refers to any citizen of the Schengen area who also holds a citizenship of a visa-exempt



third country. Currently in the EU, 16 Member States allow dual citizenship, and these citizens can travel with either of their travel documents. 9 Member States prohibit dual citizenship; however, exemptions apply.

Once ETIAS enters into operations, the situation will change for this category of travellers because the ETIAS cannot record information on any EU nationals including dual nationals who are also visa-exempt third-county nationals. To prevent the registration of the EU citizens dual nationals, the system requires the ETIAS applicants to provide all their nationalities since the travel authorisation (TA) application data must be authentic, complete, correct and reliable. Should the applicants declare an EU nationality, their application will not be accepted.

The application form will include a disclaimer explaining the reason they cannot apply for an ETIAS TA is because of their EU citizenship.

Instead, they must travel using their EU travel document (e.g. passport). Regarding the travel indications, the Commission presented the scenario of an Italian American traveller. It was explained that they cannot travel with the US passport without an ETIAS TA. If they apply for an ETIAS TA for different reasons (EU passport has expired, never obtained an EU passport), their application will be interrupted and they will be notified that they must travel with their EU travel documents.

The Commission identified potential challenges for dual nationals, such as the expiration of the EU passport, the lengthy renewal process, or not being in possession of an EU passport. Consequently, the Commission is taking some actions in this regard by publishing the relevant information on the Travel to Europe website and is preparing a list of communications to raise awareness among the Member States and third-country nationals.

The Carrier community was advised to take some actions as well, such as including a disclaimer for travellers when buying tickets, FAQs, reminder during the check-in, information note to the staff, possibility to register both passports ensuring their customers are informed and aware before booking a flight to the countries requiring ETIAS.

Finally, regarding the ETIAS timeline, the Commission reminded that the golive is planned in the last quarter of 2026. The ETIAS transition period is a period of 6 months from the date on which ETIAS starts operation. During the transition period, travellers will be allowed to enter the territory of a European country that requires ETIAS TA without an ETIAS TA. The grace period will follow the transition period for another at least 6 months, and travellers will be allowed to enter the territory of the countries that require ETIAS TA without an ETIAS TA, if this is their first entry during that period.

3. Technical updates (eu-LISA)

eu-LISA updated the CWG on the latest Carrier Implementation Figures and on the status of the different implementation areas.

An overview of the S2S CT for carriers and Service Providers were presented.



For the web portal and the mobile application, eu-LISA informed that the progress regarding the staff training is not satisfactory and reminded the community the importance of completing this phase to ensure the carriers receive the necessary credentials once the EES goes live. Finally, the CWG was informed about the latest ICAO updates regarding the handling of both P and PP travel document codes and additional codes for other travel documents under the ETIAS implementation. Considering EES scope only, the system will check the presence of a valid single or double entry visa linked to the relevant passport. Before ETIAS EiO, an error is sent if other travel document codes are transmitted in the query. After ETIAS EiO other travel document codes ICAO compliant are supported for visa-exempt travellers. eu-LISA shared the list of codes to be eligible as valid travel document codes to be accepted by the Carrier Interface and requested the industry to provide feedback if other codes are necessary to be added. Frontex informed the CWG about the state-of-play of the Standard 4. Carriers and Operating Procedures (SOP) feedback exercise which was launched on the **Travellers** 28th April 2025. It was stressed that a low number of carriers participated in Support the exercise thus the community was strongly encouraged to participate and **Operational** provide input. updates and sea scenarios The main concerns raised by the ones who participated were related mainly (Frontex) to the role and responsibilities of Carrier SPOC and BSPOC, carrier functional mailbox for support, COBST access how/when, the estimation of the number of accounts needed for COBST and the carrier interface, the user management request. Frontex emphasized that the exercise was extended until June 16th, 2025. Carriers can express their interest in receiving the draft SOP by sending an email to ETIAS.ACU1@frontex.europa.eu During the Q&A session, eu-LISA, the Commission and Frontex addressed 6. Q&A several topics and responded to questions posed by Carriers on various legislative, operational and technical topics, such as the EiO date of EES progressive start of operations, the dual nationals' topic, the Commission's information campaign.



Carriers Working Group of 2 June 2025 Summary

Subject: Monthly Carriers Working Group meeting

Air Carriers at 13:30-16:00 CEST

Participants: Carriers representing air industry, their declared service providers, Carrier associations, European Commission (DG HOME), Member State (MS) experts, Frontex and eu-LISA (altogether 161 participants).

1. Introductiona. Agendab. Carriers	eu-LISA presented the agenda of the 43 rd Carriers Working Group (CWG) to the participants. The CWG reviewed the schedule for the upcoming meeting, noting the date
meeting calendar	for the next session scheduled for July 3 rd , 2025.
2. Legal updates	The European Commission informed the community that a provisional
(European	agreement on the Regulation providing temporary derogation from certain provisions of the EES Regulation as regards a progressive start of
Commission)	operations of the EES was reached between the European Parliament and the Council of the European Union and it is expected to be adopted in mid-July 2025. Presenting the highlights of this provisional agreement, the Commission explained that the co-legislators preserved the objectives of the Commission's proposal. However, several targeted amendments with an operational impact have been introduced.
	One of the core elements of the provisional text concerns the progressivity speed. During the first phase, Member States are required to register in EES at least 10 % of the estimated border crossing in that Member State, followed by a second phase (by the 90 th calendar day from the first day of the progressive start of operations of the EES), the Member States shall register in EES at least 35% of the estimated number of border crossings.



Member States will be required to register 100% of border crossings by the 170th calendar day following the start of operations.

Regarding the suspension mechanism the provisional text allows Member States to suspend the use of the EES, or the registration of biometric data, during the 180-day period of progressive start of operations of the EES. Member States will continue to be able to suspend the registration of biometric data in the EES after the end of the progressive start of operations for a limited period of 90 days (+60 days in certain circumstances). The suspensions can last for 6 hours, renewable if needed.

Another core element underlined by the Commission refers to the Member States' transparency towards the stakeholders. The community was informed about the new obligation for Member States when preparing the roll-out plans to inform the relevant operators of infrastructure hosting border crossing points where and how they plan to start operating the EES. Member States should also inform operators and carriers when the EES is suspended, if relevant according to the local circumstances.

Furthermore, the co-legislators agreed to ensure that third country nationals are informed of the possibility to use the short stay calculator tool available on the Commission's website during the progressive start of operations (https://home-affairs.ec.europa.eu/policies/schengen/border-crossing/short-stay-calculator_en).

The Commission reiterated the retro-planning for a start of operations of the EES in October 2025. In early June, the Commission expects the submission of the three remaining declarations of readiness by those Member States who have not yet declared their readiness, thus enabling the entry into force of the Regulation by mid-July which will be followed by the adoption of the Commission's decision on the EES start of operations date. Following that decision, the Member States will be able to finalise the last preparations (legal and technical). The COM informed that the launch of the EES information campaign is planned for September.

As for the impact on the transport industry, the Commission underlined that, the carriers may start using the web service from the 90th calendar day of the progressive start of operations of the EES on a voluntary basis. According to the provisional agreement, the carriers shall verify the stamps affixed in the travel documents for the duration of the progressive start of operations of the EES. Furthermore, for a period of 180 calendar days after the end of the progressive start of operations of the EES, the carriers shall, in addition to using the Carrier Interface, continue verifying the stamps affixed in the travel documents. Following questions from carriers related to the implementation of the Carriers' Liability Directive during the progression period, the Commission clarified that the Regulation introducing the progressive start of operation of the EES establishes targeted derogations



on the use of the EES but does not modify carriers obligations established in the Carriers' Liability Directive.

The Commission reiterated the topic of the dual national with at least one EU nationality under ETIAS. It was explained that "dual national" refers to any citizen of the Schengen area who also holds a citizenship of a visa-exempt third country. Currently in the EU, 16 Member States allow dual citizenship, and these citizens can travel with either of their travel documents. 9 Member States prohibit dual citizenship; however exemptions apply.

Once ETIAS enters into operations, the situation will change for this category of travellers because the ETIAS cannot record information on any EU nationals including dual nationals who are also visa-exempt third-county nationals. To prevent the registration of the EU citizens dual nationals, the system requires the ETIAS applicants to provide all their nationalities since the travel authorization (TA) application data must be authentic, complete, correct and reliable. Should the applicants declare an EU nationality, their application will be interrupted and they will be notified that they must travel with their EU travel documents.

The application form will include a disclaimer explaining the reason they cannot apply for an ETIAS TA is because of their EU citizenship.

Instead, they must travel using their EU travel document (e.g. passport). Regarding the travel indications, the Commission presented the scenario of an Italian American traveller. It was explained that they cannot travel with the US passport without an ETIAS TA. If they apply for an ETIAS TA for different reasons (EU passport has expired, never obtained an EU passport), their application will be refused.

The Commission identified potential challenges for dual nationals, such as the expiration of the EU passport, the lengthy renewal process, or not being in possession of an EU passport. Consequently, the Commission is taking some actions to publish the relevant information on the Travel to Europe website and is preparing a list of communications to raise awareness among the Member States and third-country nationals.

The Carrier community was advised to take some actions as well, such as including a disclaimer for travellers when buying tickets, FAQs, reminder during the check-in, information note to the staff, possibility to register both passports ensuring their customers are informed and aware before booking a flight to the countries requiring ETIAS.

Regarding the ETIAS timeline, the Commission reminded that the go-live is planned in the last quarter of 2026. The ETIAS transition period is a period of 6 months from the date on which ETIAS starts operation. During the transition period, travellers will be allowed to enter the territory of a European



country that requires ETIAS TA without an ETIAS TA. The grace period will follow the transition period for another at least 6 months, and travellers will be allowed to enter the territory of the countries that require ETIAS TA without an ETIAS TA, if this is their first entry during that period.

Finally, regarding the crew member certificate (CMC) topic, the Commission recommended the use of mobile app/web portal connection of the Carrier Interface for checks of air crew under a visa obligation.

3. Technical updates (eu-LISA)

eu-LISA updated the CWG on the latest Carrier Implementation Figures and on the status of the different implementation areas.

An overview of the S2S CT for carriers and Service Providers were presented.

For the web portal and the mobile application, eu-LISA informed that the progress regarding the staff training is not satisfactory and reminded the community the importance of completing this phase to ensure the carriers receive the necessary credentials once the EES goes live.

Finally, the CWG was informed about the latest ICAO updates regarding the handling of both P and PP travel document codes and additional codes for other travel documents under the ETIAS implementation. Considering EES scope only, the system will check the presence of a valid single or double entry visa linked to the relevant passport. Before ETIAS EiO, an error is sent if other travel document codes are transmitted in the query. After ETIAS EiO other travel document codes ICAO compliant are supported for visa-exempt travellers. eu-LISA shared the list of codes to be eligible as valid travel document codes to be accepted by the Carrier Interface and requested the industry to provide feedback if other codes are necessary to be added.

4. Carriers and Travellers Support -Operational updates (Frontex)

Frontex informed the CWG about the state-of-play of the Standard Operating Procedures (SOP) feedback exercise which was launched on the 28th of April 2025. It was stressed that a low number of carriers participated in the exercise thus the community was strongly encouraged to participate and provide input.

The main concerns raised by the ones who participated were related mainly to the role and responsibilities of Carrier SPOC and BSPOC, carrier functional mailbox for support, COBST access how/when, the estimation of the number of accounts needed for COBST and the carrier interface, the user management request.

Frontex emphasized that the exercise was extended until June 16th, 2025. Carriers can express their interest in receiving the draft SOP by sending an email to **ETIAS.ACU1@frontex.europa.eu**



5. Q&A During the Q&A session, eu-LISA, the Commission and Frontex addressed several matters and responded to further questions on several aspects of the provisional agreement on the progressive entry into operation of the EES namely the central coordination mechanism for informing the carrier community, the dual nationals' topic, the type of the travel documents to be

queried, the CMC topic and registration in the EES.