

Industry Recommendations

On residual challenges ahead of the EES start of operations

August 2025

This paper presents the air carriers' proposals to the European Commission and Member States (MSs) to address the following remaining challenges ahead of the progressive start of operations of the Entry/Exit System (EES), namely:

1. Issues faced by crew members that do not hold a Crew Member Certificate (CMC) and would therefore be subject to EES border procedures, and
2. The need for transparent and effective communication from national authorities to air carriers as concerns the EES rollout at their border crossing points.

1. Crew not holding a Crew Member Certificates

Persistent challenges

- 1.1 EU MSs adopted different border procedures for crew members not holding a CMC. Typically, these crew members are exempt from visa requirements based on their passport, crew ID card, or a general declaration. This is in line with international practices and has been effective for carriers and border authorities, expediting and facilitating crew experience at such border.
- 1.2 Since the establishment of the CMC in the first edition of ICAO Annex 9 in 1949, there has been a low adoption rate globally, with only 16 States issuing CMCs, according to industry evidence. This indicates that the CMC identity function has not been prioritized and is often considered less secure than passports.
- 1.3 With the implementation of the EES, on-duty crew members not holding a CMC will be subject to EES border procedures, including enrolment. This will increase operational, administrative, and financial burdens on all carriers, including inefficient crew rotations, operational disruptions, and additional costs. Most crew members are unable to obtain a CMC as their national authorities simply do not issue them as a matter of policy. Even when national authorities would do so, the administrative cost of providing each crew member with the certificate will amount to more than 4 million EUR annually per carrier.

We recommend and call for:

- 1.4 A legislative solution: amending EU legislation to acknowledge current and future border practices, with a flexible and harmonized approach across Schengen by:
 - expanding the range of crew documents granting visa/EES/ETIAS exemptions and their formats, with a view to more digitalisation, and
 - establishing an EU-wide flexible and harmonized approach to accepted documentation
- 1.5 Operational measures on crew treatment at border crossing points: the industry proposes that MSs deploy the necessary measures ensuring that border crossing and processing of crew members remains unhindered, efficient and smooth, from the start of EES operations and until Schengen legislation is amended.

Crew members generally pose low aviation security and immigration risks. They are subject to recurrent background checks, systematic security screening, and are admitted temporarily for clearly defined duty-related purposes.

The way forward

- 1.6 In legislation: we will welcome swift and steady progress on the discussions to amend the Schengen Borders Code and remain committed to contributing to this work.
- 1.7 Operationally, we encourage MSs and the European Commission to:
- adopt specific measures to expedite crew treatment at the border, for instance through dedicated queues, and
 - provide industry with timely, complete and centralized information on national derogations from visa and/or ETIAS requirements for crews across the EU, ideally via a dedicated online resource or any other easily accessible interface

2. Transparent and effective communication from Member States to air carriers

Background and challenges

- 2.1 Recital (18) of Regulation 2025/1534 recognizes the distinct application of the EES at Border Crossing Points (BCPs) and emphasizes the importance of effective communication and transparency from MSs to carriers regarding the deployment of the EES at BCPs.
- 2.2 It is therefore essential that MSs provide carriers with timely and comprehensive information on their planned EES deployment at the border. A lack of communication and information flow from authorities well in advance of the EES rollout would directly hinder our members' ability to adequately prepare and inform travellers in a timely manner.
- 2.3 Expecting air carriers to individually contact each border control authority, each BCP or every airport management company to obtain details on EES rollout plans, including each phased approach, is most impractical and inefficient for all actors involved.
- 2.4 Today, only a small number of MSs are proactively and consistently informing carriers and other affected stakeholders about the status and implementation plans of EES within their territory.

Our recommendations and way forward:

- 2.5 We urge each national authority establish regular and centralized communication channels, in order to provide air carriers with timely and detailed information on national EES rollout plans, including any update on their approach to the progressive start of operations.
- 2.6 We call on the European Commission to national authorities on this matter, providing for full transparency and information flow between all concerned stakeholders across the Union, safeguarding the Internal Market and the commitments made so far.

Our industry remains committed to collaborate with institutions and authorities and identify effective solutions and anticipate frictions before the full rollout of the EES.

At the same time, ahead of the start of the European Travel Information and Authorisation System (ETIAS) operations in 2026, the air transport is also concerned about the negative effects of the disproportionate proposed increase of the ETIAS registration fee from €7 to €20. We emphasize our call for a thorough impact assessment justifying the new proposed fee. We call on all MSs to scrutinize thoroughly the Commission's decision, evaluating the socio-economic consequence of such a drastic increase.

About us

About A4A (Airlines for America)

Airlines for America (A4A) advocates on behalf of its members to shape crucial policies and measures that promote safety, security and a healthy U.S. airline industry.

About A4E (Airlines for Europe)

Founded in 2016, A4E represents the united voice of Europe's leading airlines in Brussels. Its 17 airline group members represent over 80% of European air traffic and carried over 771 million passengers in 2024. Leading global aircraft manufacturers are also members of A4E. Airlines with cargo and mail activities transport more than 4 million tons of goods annually.

About Association of Asia Pacific Airlines (AAPA)

The AAPA is the trade association for scheduled international airlines based in the Asia-Pacific region. The AAPA permanent secretariat is headquartered in Kuala Lumpur, Malaysia with international representation in Brussels and Washington, D.C. Collectively, the region's airlines represent over one-third of global passenger and air cargo traffic, and thus play a leading role in the ongoing development of global aviation.

Airlines International Representation in Europe (AIRE)

An Airline Association formed principally of European Airlines, based in Brussels Belgium, whose scope is dealing with advocacy on EU Regulations in Aviation with a number of EU Institutions, ECAC and EASA.

About the Latin American and Caribbean Air Transport Association (ALTA)

ALTA is a non-profit organization that fosters a safer, more sustainable, efficient, and competitive aviation environment for airlines in Latin America and the Caribbean. We achieve this through advocacy, and collaboration with governments and industry stakeholders to strengthen connectivity, drive economic development, and support social progress across the region. Our member airlines carry over 80% of the region's passengers, underscoring aviation's essential role in regional development.

About European Regions Airline Association(ERA)

Founded in 1980, European Regions Airline Association (ERA) is a non-profit trade association representing more than 50 airlines and over 150 associate members involved in European air transport, and is the only association that bring together the entire spectrum of companies involved in European aviation. The association supports and defends the airline industry in providing safe, efficient and sustainable air connectivity to all regions of Europe. By lobbying European regulatory bodies on policy matters, ERA promotes and protects social responsibility, environmental sustainability and the development of regional economies and local communities.

About IATA (International Air Transport Association)

The International Air Transport Association (IATA) is the trade association for the world's airlines, representing some 350 airlines or 80% of total air traffic. We support many areas of aviation activity and help formulate industry policy on critical aviation issues.

About the National Airlines Council of Canada (NACC)

The National Airlines Council of Canada represents Canada's largest national and international passenger air carriers: Air Canada, Air Transat, Jazz Aviation LP and WestJet. It promotes safe, sustainable, accessible and competitive air travel by advocating for the development of policies, regulations and legislation to foster a world-class transportation system. Pre-pandemic our members collectively carried over 80 million passengers annually, directly employed over 60,000 people and served as a critical component of Canada's overall air transport and tourism sector, which supported more than 630,000 jobs.