

# Global Immigration alert

March 2025

## European Union

### Plan for phased deployment of the EES gets provisional approval

#### Executive summary

On 5 March 2025, the European Council adopted a proposal for EU Member States to progressively launch the Entry/Exit System (EES) over a six-month transition period starting in October 2025. The European Parliament will need to approve this timeline before it is officially confirmed.

#### Background

The EES is an IT system designed to mitigate irregular migration to the Schengen Area (encompassing all EU Member States except Cyprus and Ireland) and expedite the entry and exit of bona fide non-EU nationals traveling for short stays. It will register non-EU nationals' entry into, and departure from, the Schengen Area (including their biometric information) and replace the current manual process of stamping passports. The EES will apply to all non-EU citizens, including visa-exempt and visa-requiring nationals, who cross the external borders of the Schengen Area. This new system was initially set to be introduced in October 2022, but its launch was delayed due to IT issues and concerns about border controls. In December 2024, the European Commission proposed a [progressive implementation](#) of the EES.

#### Key developments

Under the planned phased deployment of the EES:

- EU Member States will aim to register at least 10% of individuals crossing the Schengen borders via the EES in the first month of this system's launch.
- For the first 60 days, Member States will be able to operate the EES without recording travelers' biometric information.
- After three months, Member States will aim to register at least 50% of individuals crossing the Schengen borders via the EES and record all travelers' biometric information.

- By the end of the six-month transition period, Member States will aim to register all impacted travelers via the EES.

The timeline above is optional, and Member States may choose to start full operations of the EES from the first day of its launch. During the transition period, manual stamping of travel documents will continue. Specific details of the deployment of the EES will be announced once the European Parliament approves the plan above.

In addition to adopting the proposal for phased deployment, the European Council also approved a revised roadmap for the launch of an interoperability architecture (i.e., an interconnected system of IT tools) to support border management and law enforcement. This new infrastructure will include an updated version of the Eurodac, the EU's centralized biometric database designed to assist with the management of asylum applications, which is expected to become operational in June 2026.

The European Travel Information and Authorization System (ETIAS), another IT system designed to mitigate irregular migration to the Schengen Area, is set to be introduced after the EES. It will apply to most non-EU nationals who are visa exempt and require them to complete an online registration form prior to travel. The implementation date of ETIAS is not yet confirmed, but at the time of this publication, it is expected to be launched in the last quarter of 2026.



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### Impact on employers

Employers may continue to monitor developments related to the EES and ETIAS and adopt internal policies as required to ensure compliance.

### Key steps

EY will continue to monitor these developments. Should you have any questions, we encourage you to contact one of our immigration professionals.

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