## Global Immigration alert

May 2025

# **European Union**

### Provisional agreement reached for gradual deployment of the EES

#### Executive summary

On 19 May 2025, the European Council and the European Parliament reached a provisional agreement that allows EU Member States to gradually introduce the Entry/Exit System (EES) over a six-month period.

#### 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

During the phased deployment of the EES:

- EU Member States will aim to register at least 10% of the individuals crossing the Schengen Area external borders via the EES in the first month of the system's launch.
- During 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 35% of the individuals crossing the Schengen Area

external 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 phased roll-out addresses the needs of Member States by allowing those who prefer a gradual implementation over 180 days to proceed accordingly, while allowing others to start full operations immediately. During the transition period, manual stamping of travel documents will continue.

As EES operations begin, Member States may fully or partially suspend the system at certain border crossings in exceptional circumstances, such as high traffic volumes that lead to long waiting times. After the initial phase, they may also suspend operations at specific border crossing points for up to six hours under similar conditions.

This agreement is provisional and requires approval by the Council and Parliament before both institutions can formally adopt it.

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 goes into effect. It will apply to most non-EU nationals who are visa exempt and requires 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, is expected to be launched in the last quarter of 2026.



#### Impact on employers

Employers may continue to monitor developments related to the EES and ETIAS and update 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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