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# Global Immigration alert

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## European Union

### Entry/Exit System fully operational as of 10 April 2026

#### Executive summary

On 10 April 2026, the European Union's Entry/Exit System (EES) became fully operational across 29 Schengen countries, marking a significant shift in how short stays by non-EU nationals are recorded and monitored. The system replaces manual passport stamping with digital entry and exit records and introduces mandatory biometric data collection (facial image and fingerprints) at the EU's external borders.

While the EES aims to modernize border management and improve enforcement of the 90-days-in-180 rule, the first weeks of full operation have resulted in substantial delays at major airports, including missed flights and extended queues at border controls. These disruptions present immediate risks for employers relying on time-sensitive business travel to and within the Schengen Area.

#### Background

The EES is an EU-wide IT system that applies to non-EU nationals traveling for short stays, whether visa required or visa exempt, and covers both business and visitor entries. The EES does not apply to EU, European Economic Area (EEA) and Swiss nationals, or to third-country nationals holding long-stay (national) visas or residence permits issued by a Schengen Area member country. Following a progressive rollout that began in October 2025, the EES is now used as the default process at external Schengen borders, although border authorities may still invoke temporary or partial suspensions in exceptional circumstances.

#### Key developments

The following considerations outline the current situation regarding implementation of the EES:

- From 10 April 2026, the EES is used as the default process at external Schengen borders for in-scope travelers, replacing passport stamping in normal operations, although border authorities may temporarily suspend EES registration in exceptional situations.

- At first entry under the EES, travelers must provide four fingerprints and a facial image, creating a digital travel record stored for up to three years. Subsequent entries are expected to be quicker but will continue to rely on biometric verification.
- In the initial days following full implementation, airports and airlines reported queues of up to three hours, in some cases resulting in missed connections and flight departures without passengers, prompting calls for greater operational flexibility during peak periods.
- In response to these disruptions, industry bodies representing airports and airlines have called on the European Commission to allow temporary flexibility or partial suspension of EES processing during peak travel periods, warning that disruptions may continue into mid-2026.

#### Impact on employers

The full implementation of the EES may have several implications for employers, including the following:

- Business travel disruption:** Employers should anticipate longer processing times at Schengen entry points for non-EU business travelers, particularly first-time EES registrants. Processing times may vary by location, travel volumes and operational decisions taken by border authorities, potentially affecting project timelines, client meetings and short-term assignments.
- Increased compliance exposure:** Under the EES, days spent in the Schengen Area are calculated automatically based on recorded entry and exit events. To avoid a perceived overstay, travelers must ensure their exit from the Schengen Area is formally registered by border authorities, as missed or incomplete exit registrations, particularly during disruptions, may continue to count stay days and affect future travel or visa eligibility.

- *Travel planning adjustments:* Organizations may need to revise their internal travel policies to allow additional buffer time, reassess connection scheduling and provide clearer guidance to travelers on biometric enrolment and the importance of completing exit border controls so departures are correctly logged under the EES.

#### 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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