Brussels,
October, 2026

Joint Position Paper on the Entry/Exit System

1. Executive Summary/main recommendations:

European Shipowners | ECSA, the Cruise Lines International Association (CLIA), and Interferry support the security objectives of the Entry/Exit System (EES). However, its uneven and operationally fragile implementation across Member States is causing significant disruption for the European shipping sector:

- **The large majority of self-service kiosks installed at ports are not working;**
- **Disproportionate waiting times or congestion in ports;**
- **There is no consistent mechanism to check whether, and when, a seafarer or maritime worker has exited Schengen. Seafarers should be recognised as a distinct category of travelers;**
- **Cruise operators have had to adjust itineraries, so ships arrive a day earlier to complete inbound clearance;**
- **The ongoing uncertainty around the EES emergency mechanisms raise level-playing-field concerns, as different ports and Member States apply EES requirements at different speeds and intensities.**

The shipping industry therefore urge the European Commission to **ensure that sufficient operational flexibility remains available beyond the end of 2026** and to establish a permanent, legally secure and harmonised mechanism at EU level allowing **biometric data collection to be temporarily suspended where necessary to preserve border fluidity**.

2. Impact of the EU Entry/Exit System (EES) on European Shipping

Following the implementation of the Entry/Exit System (EES), the European shipping sector has encountered operational disruption, due to the system not yet being fully deployed across all passenger types or ports. Impacts vary across Member States and locations, with operators experiencing significant delays linked to full biometric checks.

There are consistent concerns around border processing times, lack of flexibility in peak conditions, insufficient staffing and immature and unreliable technical systems. Following the implementation, and especially during the summer season, companies had to come across cancelled bookings, disruption to vessel turnaround times, rerouting of services and emerging competition distortions between routes.

European Shipowners | ECSA, CLIA and Interferry support the security objectives of the EES. However, its implementation remains uneven and operationally fragile across Member States. Specifically, the main challenges for the shipping sector are the following:

- **The large majority of self-service kiosks installed at ports are not working**. Operators report significant delays, with around 150 vehicles taking approximately 90 minutes to clear. Longer queue times are expected, with delays of up to four additional hours, once biometric collection is extended to vehicle traffic. These delays may also have further implications for passengers, such as missed connections.

- **Disproportionate waiting times and port congestion**. The roll-out of the EES, and biometric data collection in particular, should not lead to excessive queues or congestion in ports. Where significant operational disruption occurs, **sufficient flexibility should be available to temporarily adapt biometric checks**. Border fluidity should therefore be recognised as a key condition for the sustainable implementation of the EES in the maritime sector

- **There is no consistent mechanism to check whether, and when, a seafarer or maritime worker has exited Schengen**. In some ports, an exit is registered only where the vessel's next port of call is outside Schengen. However, this condition does not reflect the offshore wind and energy sector for example, or the cases of cruise ships, ferry connections or cargo connections between Member States, where vessels regularly operate within Schengen waters while employing significant numbers of non-EU nationals. As a result, the exit of these seafarers may never be registered, and they risk being wrongly classified as overstayers. A consistent mechanism would allow employers and shipping companies to verify - with the consent of the seafarer- that they remain within their permitted period of stay in the Schengen area.

- **The Schengen acquis recognises third-country national seafarers as a distinct category of travelers**. The Visa Code and the Commission's operational instructions expressly refer to seafarers in transit who enter the Schengen Area to join, rejoin, or leave a vessel. The premise has therefore been that they enter only to reach or leave their vessel, not to remain as ordinary short-stay visitors throughout their period of service. National procedures reflect this by linking the journey to a specific vessel, flag, port call and embarkation date. However, current practice in some ports appears to treat seafarers as remaining in the Schengen Area until their vessel calls at a non-Schengen port, which is difficult to reconcile with their longstanding status as persons in transit. It is therefore essential to ensure the status of seafarers as a distinct category of workers and to prevent

them from being treated as ordinary short-stay visitors. Some examples of cases affecting seafarers are set out in Annex I below.

- **Cruise operators have had to adjust itineraries** so ships arrive a day earlier to complete inbound clearance ahead of normal disembarkation.

- There is an ongoing uncertainty around when and how the EES emergency mechanisms can be applied, and on what criteria. These pressures are already resulting in cancelled bookings, customer complaints, and route switching, raising **level-playing-field concerns, as different ports and Member States apply EES requirements at different speeds and intensities**. There is also a risk of distortions of competition between neighbouring ports and maritime routes if Member States – or individual border crossing points – apply different operational solutions, levels of flexibility or biometric procedures. EES implementation should therefore avoid creating competitive disadvantages based solely on the port or route used by passengers and operators.

The shipping industry therefore urges the European Commission to ensure that **sufficient operational flexibility remains available beyond the end of 2026** and to establish a permanent, legally secure and harmonised mechanism at EU level allowing **biometric data collection to be temporarily suspended where necessary to preserve border fluidity**.

3. Contact:

Evina Fotiadou

Director for Shipping Policy and Communications
European Shipowners | ECSA
evina.fotiadou@ecsa.eu
+32 (0) 496926478

Annex I

Examples: Consequences of incomplete or inaccurate entry/exit records for seafarers

1. During a crew change in August 2026, a shipping company reported several cases in which seafarers travelling through Paris Charles de Gaulle Airport (CDG), had their entries into or exits from the Schengen Area incorrectly recorded, or not recorded at all:

- One seafarer had no record of exiting the Schengen Area in May 2026, nor any subsequent re-entry. He was therefore treated as having remained in France continuously since May, which resulted in an apparent overstay of his authorised 90-day period. The situation was compounded by the fact that his previous passport had been cancelled and could no longer be scanned to correct his records.
- Four other seafarers had no recorded entry into the Schengen Area at CDG, exposing them to the risk of being considered irregularly present, with potential consequences including fines or detention pending clarification of their status.
- Only three seafarers had their entries recorded correctly.

The company stressed that these irregularities were beyond its control and could have serious consequences for seafarers, particularly during subsequent crew changes or port calls abroad.

2. At the border checkpoints of the Seaport Police Rotterdam-Rijnmond, a sufficient number of self-service kiosks are available. However, the procedure is not used efficiently: after a seafarer has completed EES registration at a kiosk, the immigration officer at the desk still carries out an additional manual check. This duplication is time-consuming, leading to longer waiting times and additional parking costs. At the Royal Netherlands Marechaussee (KMar) border checkpoints in Amsterdam, IJmuiden, Rotterdam, the Hague Airport and Vlissingen, no self-service kiosks are available for seafarers, and EES registration is still carried out manually for each individual.

Seafarers have also reported that the current border processing system lacks consistency and clarity. There are also concerns regarding the accuracy and transparency of travel records. Travellers have no practical means of independently verifying their recorded entries and exits and must rely entirely on the system's accuracy. Any errors within the system could have serious consequences for individuals, including the risk of future travel restrictions within the European Union.