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NOTE

From: Presidency
To: Delegations
No. prev. doc.: 6981/25; 8759/25
Subject: Travel information: possible way forward (continued - 2)

1. Context

The Danish Presidency wishes to **continue reflections on the possible way forward** on EU travel information policy, building on the work of previous Presidencies. Travel information is **a widely acknowledged tool** to contribute to the EU's internal security and border management. At the same time, and in line with the methodology endorsed as part of the Information Management Exchange Framework (IMEF), any proposed further developments need to have a **clear added value and benefit from large support**.

Last semester, the Polish Presidency provided delegations with **an overview** of existing policy instruments, as well as ongoing or possible future policy initiatives (based on ST 6981/25, and presentations by the Commission, eu-LISA and some Member States). On this basis, the Polish Presidency then **initiated a strategic discussion** aimed at getting a general sense of delegations' **main challenges and priorities** regarding the EU's travel information policy, while specifically gathering their views on the **preferred way forward regarding travel information in the context of maritime and land transport** (based on ST 8759/25).

As noted at the 23 July 2025 IXIM meeting, the Danish Presidency wanted to ensure that all delegations had an opportunity to provide inputs to this strategic discussion before suggesting a way forward and extended the deadline for comments to ST 8759/25. Since then, the Danish Presidency received **additional written contributions**, which have been included in **WK 8718/25 REV 2**.

The present paper aims at **summarizing the delegations' inputs** to the strategic discussion initiated under Polish Presidency and **suggesting a possible priority setting** on that basis.

At the 29 September IXIM meeting, the Danish Presidency intends to discuss questions linked to a possible endorsement of these priorities (see section 4).

2. Summary of delegations' positions

In addition to the positions expressed orally in IXIM meetings, a total of 17 delegations provided written inputs to (part of) the **questions asked in document ST 8759/25**, namely:

- *What do you consider to be your main challenges with the current EU travel information policy framework?*
- *What do you think should be the priorities going forward as regards the consolidation and further development of the EU's travel information policy?*
- *Based on the outcome of the studies, do you consider the EU should further consider measures on:*
 - o *Harmonising access by law enforcement authorities to maritime travel information already collected and transferred by operators at national level for other purposes?*
 - o *Regulating the collection / transfer to law enforcement authorities of additional maritime travel information (such as Booking and Reservation Information) for cruises and ferries?*

- *Regulating the collection / transfer of travel information by law enforcement authorities on long-distance buses?*
- *Regulating the collection / transfer of travel information by law enforcement authorities on long-distance trains?*
- *Expanding the use of Automatic Number Plate Recognition (ANPR) systems and increasing its synergies with the Schengen Information System?*
- *Any other aspect of travel information?*

Answers show that according to Member States there is a shared understanding on the usefulness of travel information. At the same time, different **views have been expressed** on the most immediate challenges and priorities going forward, and in particular on the specific topics to be tackled concerning maritime and land transport. They can be summarized as follows.

A. Main challenges regarding the EU's travel information policy

- Respondents **most frequently** mention remaining **challenges of operational or practical nature**, for example the quality of data received from carriers and the need for better techniques for data exploitation.
- Respondents also **frequently mentioned the “lack of harmonisation” in the implementation of the PNR Directive** as a challenge, in particular as regards certain requirements of the 2022 EU Court of Justice judgement (C-817/19).
- **Some delegations** make an explicit causal link between the two abovementioned considerations, noting that some of the **operational or practical challenges directly stem from the fragmented implementation of the Directive**.
- **Some** respondents point to fact that there should be **a better integration of the travel information framework as part of broader law enforcement and border management efforts**, including in the context of the development of the EU's “Smart Borders” package and of the interoperability of EU large-scale IT systems.
- Finally, a few respondents refer to **competing priorities** (e.g. roll-out of interoperability) and **resource limitations** making it difficult to implement the PNR Directive.

B. Priorities going forward for the EU's travel information policy

- Several delegations indicate a clear preference for **consolidating the existing framework before developing it further towards other modes of transport**, notably through a focus on the application of the PNR Directive, and the effectiveness and efficiency of the cooperation between Member States within the scope of the Directive, and on the implementation of the API Regulations.
- As regards the expansion of the existing framework to “**other modes**” of transportation, **most delegations indicate an openness in principle while some of them consider this strand of work as a priority**.

C. Interest regarding further measures on maritime and land transport

- In general terms, delegations expressed strong calls to ensure that any new initiatives are truly **necessary, proportional, and informed by a solid impact assessment**.
- In that view, some delegations raised the importance of data protection assessments, coherence with existing legislation, and of the close involvement of the transport community.
- There are also diverging views on the approach that an expansion of the EU travel information framework should take: while some delegations refer to a possible “**mode-neutral**” framework, most are showing **different levels of interest depending on the specific transportation mode considered**:
 - Overall, there appears to be **more interest in measures on maritime** transport, with a particular focus on the possibility to harmonise access by law enforcement authorities to **maritime travel information already collected and transferred by operators at national level**. This is not only because more delegations are directly concerned (most have a sea border, but not all are concerned by long-distance buses and trains), but also due to the challenges intrinsic to land transport (e.g. data quality, limited booking systems, infrastructure).

- There is **some degree of interest or support** regarding the regulation of additional maritime travel information for cruises and ferries, or for land transport such as on long-distance buses, and long-distance trains, as well as an expanded use of Automatic Number Plate Recognition (ANPR) systems and its synergies with the Schengen Information System. Delegations flag several possible issues of operational and technical nature – specific to each mode of transport – in relation to which further assessment is required.

3. Priorities going forward on EU travel information policy

Based on the contributions from delegations summarised above, the Presidency proposes the following priorities.

1) **As first priority, ensure that the challenges faced by Member States** in implementing the existing legal framework are taken into account and addressed. **In that sense, continue to use all relevant fora** (incl. PNR Directive application meetings, PIU network, expert meetings, IXIM) to:

- **Facilitate the effective and efficient implementation** of the PNR Directive.
- **Address operational and practical issues** stemming from its implementation.

This goes hand in hand with a call to **Member States to ensure they express the challenges they face, and any solutions found thereto, as part of the evaluation of the PNR Directive**, which started in September 2025 and due to be concluded in mid-2026, bearing in mind that the evaluation and its follow-up could lead to future improvements.

2) **As second priority, asking the Commission to ensure that preparatory work for any future development of the EU's travel information framework** addresses the policy questions and caveats raised by Member States, namely:

- The potential use of travel information **beyond law enforcement** (e.g. for border management, migration) and its potential integration **under related relevant initiatives** (e.g. Smart Borders, interoperability).
- The pros and cons of “**transport-neutral**” rules as opposed to mode-specific ones.

- The **necessity and proportionality of any new initiatives** and the need for **solid impact assessments**.

3) **As third priority, advance discussions on the added value of harmonised rules on travel information for other modes of transport through an initial focus**, given the preferences expressed by delegations, **on maritime travel information already collected and transferred by operators at national level**.

- To do so, the Presidency proposes to **gather a group of interested delegations** to:
 - a) **exchange best practices** on the access to and use of such maritime travel information by law enforcement authorities;
 - b) **identify operational and technical issues** of implementing such system at national level, which **require further assessment**.
- The group should include **ongoing and future Presidencies** and the General Secretariat of the Council to ensure continuity.
- The **Commission** should also be involved to ensure the discussions build on their related study and can best feed into future measures.

If deemed relevant, **such initial focus could later be enlarged to (some of) the other key strands** of work, namely travel information from:

- I) maritime transport, which not yet collected and transferred by operators at national level;
- II) long-distance rail transport;
- III) long-distance bus transport;
- IV) ANPR systems.

4. Questions for discussion

- 1. Do you agree with the proposed prioritisation?**
- 2. In particular, the success of the **third priority (initial focus on maritime information)** requires a strong Member States commitment. The Presidency considers it necessary to gauge this before moving ahead.**
 - a) Does your delegation volunteer to be part of the group of Member States that will focus on maritime travel information already collected and transferred by operators at national level?**
 - b) If so, is your delegation interested in taking a moderating role?**
 - c) Do you agree with reflecting this priority **in the IMEF's Action List**, to ensure the necessary monitoring and follow-up?**