

Revision of Schengen short-stay visa procedures (recast)

Response to call for evidence

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Introduction

Pearle*-Live Performance Europe welcomes the opportunity to contribute to the revision of the Visa Code. Cross-border mobility is a structural feature of the live performance sector. Theatres, concert halls, festivals, orchestras, opera and dance companies and other performing arts organisations regularly engage artists and cultural professionals, including technical and production personnel, or invite music or performing arts groups from third countries for performances, productions and tours across the Schengen area.

Pearle* therefore welcomes the objective of the revision to facilitate legitimate travel alongside the other objectives of the common visa policy. The current Call for Evidence recognises cultural visits as one of the forms of legitimate travel supported by short-stay visas and identifies more predictable and efficient procedures as an objective of the revision.

This work should build on the EU Visa Strategy adopted in January 2026, which explicitly recognised the particular difficulties faced by highly mobile third-country professionals, including touring artists, and committed the Commission to exploring pragmatic solutions for extended short stays and options for longer-validity multiple-entry visas. Pearle* welcomed¹ this recognition and encourages the Commission to ensure that the **specific realities of artistic mobility** remain reflected in the implementation of the Strategy and in the revision of the Visa Code.

Facilitation measures should reflect the realities of professional artistic mobility

Pearle* welcomes the Commission's intention to explore facilitation for reliable applicants, including faster processing, priority appointments and reduced requirements for supporting documents. However, the proposed approach currently places particular emphasis on employees travelling on behalf of verified companies.

Professional mobility in the live performance sector often does not follow a traditional corporate employment model. Artists and cultural professionals may be self-employed, freelance, engaged for individual productions or tours, or work for several organisations in different countries over relatively short periods. Touring productions may also involve artists, musicians, technicians and other professionals engaged through different contractual arrangements.

¹ [Statement - Pearle* welcomes the European Commission's EU Visa Strategy and the attention to artistic mobility](#)

Facilitation measures **should therefore not be limited to employees of companies appearing on a list of verified businesses in the sending country**. The revised framework should allow the *bona fide* nature of a professional journey to be demonstrated through **recognised cultural organisations and professional intermediaries**, including venues, festivals, orchestras and ensembles, producers, promoters and other organisations inviting or engaging the traveller. In this regard, Pearle* has made a plea in the past to provide for closer cooperation with the receiving organisations, as those are either recognised cultural public bodies or culturally subsidized organisations, or registered as private companies in the music or performing arts sector. At the same time, any role given to host organisations in confirming the professional nature or credibility of an application **should not result in an undue transfer of legal or financial responsibility to those organisations**, including disproportionate guarantees or repatriation obligations.

Visa requirements and work-authorisation requirements are legally distinct, but in practice they can be closely interconnected. Delays or uncertainty in the visa process may affect the subsequent completion of national work-authorisation procedures, particularly where those procedures can only be finalised once a visa has been issued. **Greater coherence in the sequencing and administration of these procedures would help reduce the risk that administrative delays jeopardise performances or tour dates.**

In the context of the further digitalisation of visa procedures, Pearle* also encourages the Commission to consider mechanisms allowing for the **coordinated submission and processing of applications relating to the same tour or artistic production**. Artists and technical staff frequently travel as part of the same production, and processing their applications entirely in isolation can create significant operational risks where the delay of a single essential member of the team may jeopardise a performance or tour date. Such a mechanism should facilitate coordinated processing while preserving the individual assessment of each visa application.

Facilitate repeated professional travel through multiple-entry visas

For many artists and cultural professionals, mobility to the Schengen area is not a one-off event. The same professional may return several times during a season for different performances, tours, rehearsals or collaborations.

Pearle* therefore encourages the Commission to use the revision of the Visa Code to **facilitate access to multiple-entry visas** for *bona fide* professional travellers with an established travel history. **Longer-validity multiple-entry visas** can significantly reduce repeated administrative procedures for both applicants and the cultural organisations engaging them. This would also give practical effect to the commitment in the EU Visa Strategy to explore options for multiple-entry visas with longer validity.

Ensure proportionate documentation and more consistent consular practices

The administrative burden surrounding visa procedures remains an important practical obstacle to international touring. Pearle*'s recent report² on cross-border mobility has highlighted the impact of complex and sometimes unclear administrative procedures on live performance organisations, including in relation to visas. Greater consistency in rules and their implementation is therefore essential.

² [Unleashing the Potential of the European Live Performance Sector - Key findings from a Pearle* mobility survey](#)

Supporting-document requirements should be proportionate to the circumstances of professional cultural mobility and sufficiently flexible to accommodate touring itineraries, several engagements, applications linked to the same artistic production or tour, and project-based working relationships. Clearer guidance should also help ensure more consistent implementation across consulates. Pearle* therefore supports efforts to make visa procedures more predictable and encourages the Commission to consider how **common guidance and closer coordination between consulates** could reduce divergent practices affecting artists and cultural professionals.

Avoid disproportionate additional costs for professional cultural mobility

Pearle* notes that the Commission is considering the feasibility of introducing a harmonised additional charge on top of the Schengen visa fee. Any such **measure should take into account its cumulative impact on professional cultural mobility**. Touring productions may involve a significant number of artists and technical professionals requiring visas for the same production, meaning that even relatively limited additional charges per applicant can generate substantial additional costs for performing arts organisations.

Pearle* therefore encourages the Commission to **assess the proportionality of any additional charge for professional cultural travel and to consider appropriate exemptions or reduced rates** for artists, cultural professionals and touring groups.

Ensure proportionality when restrictive visa measures are introduced

Pearle* takes note of the proposals to develop more flexible and targeted restrictive visa measures in response to particular situations involving third countries. The Commission states that such measures should be proportionate and targeted and that safeguards should be maintained for certain categories of travellers.

Where such measures are considered, their **potential impact on legitimate artistic and cultural mobility should also be taken into account**. Artists and cultural professionals travelling for performances, collaborations or cultural exchanges should not be disproportionately affected by restrictions that are unrelated to the purpose of their travel. Appropriate safeguards and possibilities to take individual circumstances into account should therefore form part of the design and implementation of such measures.

This consideration is also consistent with the EU's and Member States' international commitments under the **UNESCO Convention on the Protection and Promotion of the Diversity of Cultural Expressions**. Article 16 calls on developed countries to facilitate cultural exchanges with developing countries by granting preferential treatment to artists and other cultural professionals and practitioners. **The design and application of restrictive visa measures should therefore also take account of these commitments and avoid creating disproportionate barriers to legitimate cultural mobility.**

Maintain progress on extended short stays for touring artists

Finally, Pearle* recalls the commitment in the **EU Visa Strategy** to identify solutions for third-country professionals, including touring artists, who may need to spend **more than 90 days within a 180-day period** across several Member States without seeking long-term residence in one Member State. Pearle* supports the development of a dedicated or otherwise clearly defined EU-level mobility solution for touring artists and cultural professionals, including

technical and production personnel, whose professional activity requires repeated short stays across several Member States beyond the current 90/180-day limit.

Pearle* recognises that this issue extends beyond the scope of the **Visa Code** itself. Nevertheless, the **current revision should be developed coherently with this parallel work**. Together, simpler visa procedures, appropriate access to multiple-entry visas and solutions for extended short stays would considerably improve the legal certainty and practical conditions for international artistic touring in Europe.

Conclusion

Pearle* encourages the Commission to ensure that the revision of the Visa Code reflects the realities of professional artistic mobility. **Facilitation measures should be accessible to the diverse range of artists and cultural professionals working across borders, support repeated and project-based mobility, and be applied consistently across the Schengen area**. At the same time, the revision should remain coherent with the wider commitments of the EU Visa Strategy, including the ongoing work on extended short stays for highly mobile professionals.

Pearle* stands ready to continue contributing its sectoral expertise to the development of visa rules that facilitate legitimate cultural mobility while maintaining the integrity and effectiveness of the common visa policy.