

EU Visa Strategy

Response to call for evidence

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Introduction

Pearle* - Live Performance Europe is the European federation representing employers in the live performance sector, including theatres, concert venues, festivals and orchestras across Europe. Touring and international mobility are at the heart of our sector. Productions often rely on international ensembles, guest artists, and technical staff, while concert tours and performances frequently cross multiple borders in a short period of time. In this context, EU visa and migration rules have a direct and significant impact on our capacity to deliver cultural exchanges and ensure that European audiences can access diverse cultural experiences.

Pearle* welcomes the initiative of the Commission to develop a new visa policy, as it has been an active stakeholder in the past on the practical implications of the EU's visa policy on the cultural sector. Besides collecting information on concrete cases and data together with other cultural organisations, Pearle* has also undertaken capacity building and information sharing within the sector, allowing for the collection of policy recommendations.

The new EU visa policy strategy is an opportunity to modernise and adapt the framework in a way that not only secures borders and manages migration, but also enables the EU to create legal pathways for temporary legal migration, to meet its international commitments, and last but not least, strengthen its role as a global cultural leader.

Despite the improvements made in the Schengen Acquis, such as digital visa applications and simplification of visa applications for legitimate travellers, the reality seems to contradict this. From our perspective, the current framework still creates obstacles that hinder cultural mobility and limit the potential of cultural exchange as a driver of innovation, economic growth and cooperation. Pearle*, therefore, urges the inclusion in the strategy of the facilitation of legal pathways for artistic workers.

Comments

- **90/180 days limitation**

The short-stay visa rule of 90 days within 180 days across the Schengen area was designed to balance security considerations with mobility, but it does not reflect the reality of touring in the cultural sector. International cultural productions often plan extended tours covering several Schengen countries over a prolonged period. Similarly, repeated engagements across different Member States within a six-month period are common in the cultural sector. Once the 90-day limit is reached, artists or companies must interrupt their activities, regardless of

professional commitments. This rigidity reduces flexibility, complicates scheduling, increases costs, reduces economic opportunities, and counteracts the development of long-term cultural collaborations between European-based cultural organisations and festivals and respective third-country national artistic groups or artists.

Given the upcoming implementation of the Entry/Exit System (EES) and the European Travel Information and Authorisation System (ETIAS), the EU will reinforce compliance controls and enhance its capacity to track overstays. These developments open the door for exploring new mobility solutions tailored to the cultural sector without compromising the integrity of Schengen rules. A possible way forward would be to introduce sector-specific derogations or a dedicated measure to facilitate and support cultural mobility that would:

- Apply to a clearly defined group of cultural (and sports) professionals, accompanied only by essential staff in critical and well-documented support roles;
- Require individuals to demonstrate reliability, integrity, and clear intent to leave through contracts and supporting evidence;
- Allow for a series of short stays across the Schengen area beyond the current 90/180 limit, while maintaining safeguards such as not exceeding 90 days in any single Member State;

Such an approach would provide the cultural sector with the necessary flexibility for cross-border touring and long-term cooperation, while maintaining robust control mechanisms for the Schengen Area.

- **Fragmentation of visas for paid activity, work permits and exemptions**

While short-stay visas are harmonised at the EU level, rules on visas for paid activity and, by extension, work permits remain fragmented or targeted only to specific groups (researchers, students, highly skilled). Whilst the EU has no specific approach to artists and cultural professionals, member states have, but they are fragmented, which is extremely complicated for touring artists and is a pressing argument for the EU to coordinate member state policies on artist mobility from third countries. Some Member States exempt cultural professionals from work permits for short engagements, while others impose lengthy procedures, additional costs, and unpredictable processing times. The result is a patchwork of national rules¹ that organisations must navigate, often at short notice. This creates difficulties for all cultural operators, adding costs, delays and uncertainty. The impact is felt most acutely by small and medium-sized organisations (which make up the majority of the live performance sector) for whom such fragmentation can become a prohibitive barrier.

The Commission should encourage greater convergence of visas for paid activity and national work permit exemptions for cultural professionals, following from already existing rules in member states, ideally through EU-level guidelines or a framework of minimum standards, to reduce fragmentation and improve predictability.

- **Practical issues in visa processing**

¹ An overview is available in the [publication](#) “the ultimate cookbook for cultural managers: third-country nationals working in the EU” – pages 41-46

In addition to the legal and structural challenges, practical problems at the consular level continue to create significant barriers for the live performance sector. Individuals often face long waiting times for visa appointments, especially in non-EU countries with limited consular capacity. Delays in processing or a lack of clear information on required documentation or evidence can force cultural operators to adjust or cancel planned activities at short notice. Touring productions frequently work with tight schedules, and the inability to secure visas in time can result in financial losses and reputational damage. Whereas the new visa code requires providing an explanation when a visa application is rejected, the reasons stated are often general, not giving insight into the rejection. This impacts the chances for the next application. There are also cases reported where visas are issued after the planned date of travel, which implies rebooking and thus extra costs and replanning of rehearsal schedules.

Addressing these practical issues through better resourcing, faster implementation of digitalisation by member states, and clear communication in relation to the documentation to be provided by applicants should therefore be a priority for the new visa strategy.

In addition, cooperation with the cultural sector in the form of capacity building and training of consular personnel is a valuable way to improve the visa procedure.

- **Implementation of EU-funded programmes**

EU-funded initiatives such as Creative Europe, Erasmus+ and Horizon Europe, or initiatives which result from trade agreements, development programmes, or external relations with third countries, rely on the concrete results of international cultural cooperation. These programmes are designed to foster partnerships between the EU and third countries, yet inconsistent visa and work permit procedures can cause delays or disruptions. A co-production involving partners from inside and outside the EU may be jeopardised if artists cannot obtain the necessary permits in time. This risks damaging the reputation of the EU as a cultural partner and undermining the effectiveness of its own investments. Mobility obstacles thus directly reduce the added value of EU cultural programmes and limit their reach.

The EU should ensure that visa and permit procedures for participants in EU-funded projects are streamlined and prioritised, possibly through a fast-track channel linked to participation in EU programmes. This would guarantee that projects financed by the Union are not undermined by administrative barriers and would enhance the visibility and credibility of EU cultural cooperation.

- **International obligations under UNESCO**

This need for consistency extends beyond EU programmes. The EU and its Member States are parties to the **UNESCO Convention on the Protection and Promotion of the Diversity of Cultural Expressions**. Article 16 of the Convention calls for the facilitation of cultural exchanges with developing countries by granting *“preferential treatment to artists and other cultural professionals and practitioners, as well as cultural goods and services”* from these countries.

If the EU is to remain committed to promoting cultural cooperation abroad, its internal visa policy must be aligned with its external commitments. A future EU visa strategy should therefore explicitly acknowledge these obligations and integrate cultural mobility as a policy priority. By doing so, the EU would not only meet its international legal commitments but also reinforce its role as a global actor in cultural diplomacy.

Conclusion

In light of these considerations, Pearle* strongly supports the European Commission's initiative to develop a new EU visa policy strategy. For the live performance sector, this is a unique opportunity to adapt existing rules to the realities of cultural mobility, while ensuring consistency with broader EU objectives in migration, innovation and international cooperation. Addressing practical solutions to the rigid limitation of the 90/180 rule is essential to allow longer tours and repeated mobility that are indispensable to our sector. At the same time, greater alignment of (existing) work permit exemptions across Member States would significantly reduce administrative burdens, lower costs, and provide the legal certainty that both organisations and artists require. Based on internal analysis of Member State rules on artistic exemptions, an EU-wide approach would be welcomed.

By modernising and simplifying visa procedures, the EU can also safeguard the smooth implementation of its own programmes in culture, research and education, ensuring that investments in international cooperation are not lost due to administrative obstacles. Importantly, the strategy must explicitly integrate the EU's obligations under the UNESCO Convention, which recognises cultural mobility as a fundamental condition for the protection and promotion of cultural diversity. Furthermore, tackling the practical issues of visa processing, from long appointment waiting times to limited consular capacity, and transparent communication, will make a tangible difference for organisations working with artists and professionals from third countries.

The live performance sector contributes not only to the economy and employment, but also to the EU's visibility and influence worldwide. By making cultural mobility a central dimension of the EU visa strategy, the Commission will help Europe remain a leading destination for cultural exchange, innovation and creativity, while also reinforcing its international commitments and strengthening the values on which the Union is built.