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EGDF response on the Digitalisation of visa procedures Questionnaire for the public consultation

About EGDF

1. **The European Games Developer Federation e.f. (EGDF)**¹ unites national trade associations representing game developer studios based in 18 European countries: Austria (PGDA), Belgium (FLEGA), Czechia (GDACZ), Denmark (Producentforeningen), Finland (Suomen pelinkehittäjät), France (SNJV), Germany (GAME), Italy (IIDEA), Netherlands (DGA), Norway (Produsentforeningen), Poland (PGA), Romania (RGDA), Serbia (SGA), Spain (DEV), Sweden (Spelplan-ASGD), Slovakia (SGDA), Turkey (TOGED) and the United Kingdom (TIGA). Through its members, EGDF represents more than 2 500 game developer studios, most of them SMEs, employing more than 35 000 people.
2. **The games industry** represents one of Europe's most compelling economic success stories, relying on a strong IP framework, and is a rapidly growing segment of the creative industries. The European digital single market area is the third-largest market for video games globally. In 2019, Europe's video games market was worth €21bn, and the industry has registered a growth rate of 55% over the past five years in key European markets². All in all, there are around 5000 game developer studios and publishers in Europe, employing closer to 80 000 people.³
3. **The games industry relies on immigration infrastructure that ensures the free movement of industry talent and minimal bureaucratic burden for industry professionals.** European games industry conferences and trade shows play a crucial role in enabling cross-border knowledge transfer between industry professionals. Thus they should be easily accessible also for non-European industry experts. Furthermore, due to the talent shortage, the growth of the European games industry relies on talent immigration. Game developer studios recruit especially senior specialists from abroad. Their quick, reliable and easy access to onsite job interviews is a crucial part of the recruitment process. Due to the lack of risk-taking European venture capital investors, many European game developer studios rely on access to Chinese or American equity funding. Successful onsite visits to European studios are an essential part of that investment process.

¹ For more information, please visit www.egdf.eu

² ISFE Key Facts 2020 from GameTrack Data by Ipsos MORI and commissioned by ISFE <https://www.isfe.eu/data-key-facts/>

³ European Games Industry in 2018:

<http://www.egdf.eu/wp-content/uploads/2020/08/European-Report-on-the-Game-Development-Industry-in-2018.pdf>

Digital Visa

EGDF supports the digital visa

4. EGDF strongly supports the initiative to introduce a fully digital VISA. An accessible, quick and reliable digital visa, and a more paperless immigration system in general, would significantly reduce the immigration-related administrative burden. Furthermore, as the USA and UK have introduced more strict and burdensome immigration policies, a well-working digital immigration system would make Europe a more attractive location for business events and meetings. At the same time, it would increase the competitiveness of the EU as the location for top industry talent to immigrate to and make Europe an attractive location for investors.

Accessible VISA

5. Ideally, the VISA should be accessible through a mobile device. A copy of it should be printable for cases where online access goes suddenly down (e.g. a network error on an airport). Furthermore, the EU must provide access for trusted private sector partners in the system so that, for example, airlines can check that travellers have all required travel documents.

Online application

Identification should only be required once in five years.

6. EGDF fully supports the initiative to introduce an online application system where identification would only be required for first-time applicants and then every five years. The proposed online system must be designed to be quick, user-friendly and predictable. The system must work reliably, and applicants can rely on the fact that the online application process does not take longer than a few days.

Towards more interoperable immigrations systems and harmonised requirements for supporting documents

7. The digital visa application process should be fully integrated into the national portals managed by each member state. It would secure that the new digital visa system is integrated from the outset to the member states' digital immigration system and designed in a way that the system is completely interoperable between EU member states.
8. However, there should be a single EU-level "EU digital embassy" setting harmonised EU level requirements for supporting documents and providing information and guidance on the application process for travellers. At the moment, some EU member states require a ridiculous amount of supporting documents for the application.

The new system should fully explore the synergies between embassy networks of different EU member states.

9. The current system where the passport has to be sent and retrieved from an EU consulate is often slow. Furthermore, it causes a significant extra administrative burden for travellers who are not located in a city with a consulate that can process the application. Ideally, the system would work in a way that embassies from different EU member states would be able to cover different parts of the process (e.g. the visa application is submitted to France, but identification takes place in a Dutch embassy, and the VISA is retrieved from a German embassy). This would make the new system much more user friendly, reduce the need for unnecessary travelling and thus limit the CO2 emissions caused by immigration bureaucracy and thoroughly explore the synergies of the vast embassy networks of different EU countries across the globe.

Harmonised public procurement standards

10. Some EU member states have outsourced their administrative processes related to residence permit applications to external service providers. In some cases, this has led to exploitation and poor service and extra service fees for travellers⁴. The goal of outsourcing should be in making the process more effective, not to cut costs by making the process less reliable.

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⁴ For more information, please visit:

<https://www.politico.eu/article/uk-visa-firm-accused-of-government-contract-breach-over-sister-company-vfs-global-vdash-limited/>