

Unlocking the Potential of Digital Travel Documents:

GBTA's input to the EU public consultation on the digitalisation of travel documents and facilitation of travel

June 2023

The Global Business Travel Association (GBTA), with an international membership of more than 7,600 business travel professionals, appreciates the chance to participate in this consultation on digitalising travel documents. Our members' experience, accumulated in the management of 1.1 trillion Euros in business travel (2023), informs our perspective on this vital issue.

As we navigated through the challenges of the COVID-19 pandemic, the **transformative power of digital identity systems became evident**, enhancing both the efficiency and security of travel. Nevertheless, **we must address the challenges that come with digitalisation**, such as technical issues, potential discrimination, data privacy, and identity fraud concerns. This is why GBTA advocates for seamless cross-border travel and passenger clearance, robust data privacy, and universal access to interoperable digital systems for all travellers.

With these considerations in mind, we outline the following **priorities for the development and implementation of digital travel documents**:

1. [International approach, based on ICAO's International Standards](#)

GBTA firmly believes in the necessity of an international approach to travel, while acknowledging the complexities that go beyond national and European borders. GBTA strongly supports the International Civil Aviation Organization's ([ICAO's](#)) initiatives for global collaboration and standardisation, viewing it as a key to unlocking seamless travel.

In this vein, we encourage the European Commission to be proactive in aligning technical standards and policies with international governments and stakeholders. In doing so, it can foster a global ecosystem of digital identity systems that is interoperable and universally accessible. Conversely, GBTA does not support the creation of a mandatory European standard diverging from the existing [ICAO Digital Travel Credential](#).

2. [Opt-in, voluntary approach, to create buy-in for Digital Travel Credentials](#)

Based on the European Commission's impact assessment, GBTA recommends the voluntary adoption of the ICAO Digital Travel Credentials (DTC) standards within the EU (policy option 4).

This approach would allow EU citizens to be offered digital passports and identity cards adhering to international standards, thereby anticipating the global trend towards travel digitalisation. The

voluntary aspect promotes individual choice, giving citizens the opportunity to opt in when they are comfortable with the digital system. Moreover, such approach fosters global interoperability while ensuring flexibility, by allowing Member States to decide whether to issue DTCs.

Business travellers are ready to engage in the early stages of development of digital travel documents, and to provide invaluable feedback on their real-world usage. This feedback will help identify and rectify any initial challenges within the system, thereby improving the usability, functionality, and reliability of these digital documents.

3. Strict privacy safeguards, to build user confidence and acceptance

GBTA emphasises the necessity of implementing rigid safety and privacy safeguards to ensure the protection of citizens' data. By meticulously calibrating the balance between an easy-to-navigate interface and strong security protocols, we can instil trust in travellers and promote a broader acceptance of digital travel documents.

We champion the creation of digital identity systems that are intuitive and seamless to navigate, while also being proactive in addressing any potential technical issues, such as difficulties in data insertion and system glitches, to optimise the user experience.

DTCs, when designed with precision, can mitigate the risk of identity theft. Still, it's critical that any digital framework addresses concerns surrounding data privacy to alleviate citizen apprehensions. GBTA highlights the importance of robust safety measures within these digital systems to effectively secure citizens' data. This combination of ease-of-use and stringent security doesn't only cultivate trust but also promotes the wider acceptance of digital travel documents, bolstering overall confidence in digital identification.

4. Non-discriminatory approach, to ensure digital inclusion

GBTA stands against potential discrimination due to technology access disparities. Even as we shift towards automation, allowing case-specific decision-making for complex situations remains critical. We therefore advocate governmental infrastructure development for broad access to digital systems, with no additional cost, and training personnel for intervention when necessary.

Digitalisation is poised to redefine the travel industry. GBTA advocates for a secure and standardised digital travel document ecosystem, driven by coordinated efforts of the European Union, ICAO, and global stakeholders. Through policies promoting international standardisation, user-friendly systems, a non-discriminatory and a voluntary approach, streamlined travel experiences can be achieved while ensuring data privacy and security.