

MANIFESTO

ADVANCING RESPONSIBLE BIOMETRICS IN EUROPE

Responsible Biometrics Travel Industry Coalition

Responsible Biometrics in Europe's Travel Ecosystem: A Commitment to Trust, Safety and Innovation

An approach to biometric technology that combines voluntary user choice and meaningful consent with privacy and security-by-design safeguards, proportionality, full transparency, and strong accountability. It enables trusted, human-centric biometric services that protect fundamental rights while supporting innovation, operational efficiency, and seamless travel.

**The Responsible Biometrics Travel Industry Coalition includes
ACI EUROPE, Amadeus, IATA, IDEMIA Public Security and SITA.**

Travel Industry Recommendation

Europe stands at a defining crossroads.

[IATA's 2025 global passenger survey](#) shows that 74% of respondents prefer using biometrics over traditional passports and boarding passes, provided they have sufficient assurance on the security of their personal data. Biometric technologies are rapidly transforming how people move, interact, and verify their identities. The European Union has a unique opportunity to show the world that innovation and fundamental rights can advance hand-in-hand. Nowhere is this balance more visible than in the transformation of the European travel and transport ecosystem. A distinctly European model of “Responsible Biometrics” can demonstrate that technological excellence, democratic oversight, and strong privacy protections are mutually reinforcing pillars of a modern, confident digital society.

By placing individuals firmly in control of their data, ensuring safety, security and transparency at every step, and embedding accountability into system design, Europe can lead globally with a framework where **trust enables innovation and innovation strengthens rights**.

This leadership matters because the travel and transport ecosystem is undergoing a profound transformation. Biometrics, already deployed safely and at scale in sensitive public-sector contexts, are essential to managing rising passenger volumes, maintaining security, improving airport efficiency and delivering the seamless experiences passengers increasingly expect, while also strengthening the global competitiveness of European airports, airlines, and tourism industries in an increasingly digital mobility landscape. Implemented with strong safeguards, responsible biometrics allow passengers to move smoothly through airports, ports, rail stations and other mobility hubs, freeing them from repeated checks while maintaining the **highest standards of identity assurance**, which in turn significantly **enhances aviation transport security**.

Travelers want **faster processes, shorter queues, and digital identity solutions that give them control over their journey from end to end** [1]. In parallel, each year, EU transport hubs handle billions of passenger movements. In 2025, European airports welcomed an absolute record of 2.6 billion passengers, with EU carriers alone transporting around 1.1 billion people in 2024, roughly 3 million per day [2]. ACI states that 2026 will see a further expansion of passenger traffic at Europe's airports with growth expected at around +3.3%, but with persistent constraints on ground and airside infrastructure capacity. At the same time, in 2025, travel & tourism across the EU is forecast to contribute nearly €1.9TN to the bloc's GDP, accounting for 10.5% of the EU economy. Against this backdrop, any improvement in efficiency and passenger flow will have significant operational and economic impacts while enhancing security and passenger experience.

Current Regulatory Challenge

Yet Europe risks falling behind global peers and losing competitiveness compared to other regions of the world, unless it adopts a **balanced, coherent and technology-neutral approach** that protects privacy while enabling responsible biometrics deployment across the travel continuum. Without it, the deployment of key EU digital transformation initiatives, including the EU Digital Identity Wallet and Digital Travel Credential (DTC) projects, could also be constrained by limiting the availability of secure, privacy-preserving solutions that enable seamless and trusted identity verification. Ensuring a technology-neutral

framework is therefore essential to preserve Europe’s ongoing projects and deliver an optimal passenger experience.

The **experience of EU border control demonstrates** that biometrics are **neither inherently intrusive nor incompatible with fundamental rights**. With clear purposes, strict limitations, and strong governance, biometric systems already operate effectively and lawfully in highly regulated EU environments. The same safeguards, privacy-by-design, encryption, minimization, transparency, auditability, can be applied consistently to voluntary, opt-in use cases that deliver significant public and economic benefits. A coherent European approach should recognize that **responsible biometric services**, supported by meaningful consent and non-biometric alternatives with adequate means to make these alternatives operationally viable, can coexist with strong rights-based protections while reinforcing Europe’s global leadership in trusted digital solutions.

Today, outside of specific border management systems, the practical deployment of **voluntary biometric** solutions in the European travel and transport ecosystem **remains extremely limited**. This has created a paradox in which secure technologies capable of improving security, drive efficiency, and enhance passenger experience, are effectively stalled.

As the EU shapes the future of digital identity and biometric innovation, policymakers play a pivotal role in ensuring a coherent approach in which technological progress strengthens both **fundamental rights and the competitiveness of the European travel and transport ecosystem**. The industry stands ready to support this ambition through clear, actionable principles that guide safe, transparent, and rights-preserving biometric deployment across the travel chain.

These principles articulate how **voluntary, privacy-by-design, secure, and accountable** biometric services can operate within a robust EU regulatory framework, empowering individuals, improving travel efficiency for travelers and operators, and reinforcing Europe’s leadership in trusted digital solutions. They reflect a unified industry commitment to partner with regulators in building a **coherent, futureproof European model** of Responsible Biometrics that delivers real public value while maintaining the highest standards of protection.

Principle of “Responsible Biometrics”

To support this European vision, the industry endorses the following principles.

1. The Power of Traveler Choice.

Responsible biometric services must always be based on genuine choice, with explicit consent as a valid legal basis for voluntary use under Article 9 (2) (a) GDPR. For consent to be meaningful, it must be explicit, informed, freely given, and reversible at any time, with operationally viable non-biometric alternatives always available. Consent mechanisms allow passengers who opt in to benefit from faster and more seamless processes, while fully respecting the preferences of those who choose traditional methods. Consent, when properly implemented, is not a loophole but a governance tool that gives individuals meaningful agency over their data and travel experience.

The industry notes that recent restrictive interpretations of GDPR concepts, such as data minimization and necessity, are reducing the practical effectiveness of consent. In this context, the principle of proportionality, which underpins the interpretation of these concepts, requires an assessment of whether a specific processing operation is appropriate and necessary in light of its intended purpose, taking into account the safeguards in place. However, recent interpretative approaches [3] risk equating proportionality with a direct comparison between biometric verification and non-biometric alternatives without fully considering the voluntary nature of the service, the availability of meaningful and operationally viable alternatives, and the technical safeguards implemented. In practice, this may limit the ability of travelers to make a free and informed choice to opt into biometric technologies. A more contextual application of the proportionality test, reflecting the purpose, scope, and opt-in character of these services, would enable privacy-compliant voluntary biometric options at facilitation touchpoints, while ensuring that the right to consent retains practical effect under the GDPR.

We invite regulators to reaffirm and restore the practical applicability of consent and to interpret the principle of proportionality in light of the voluntary nature, limited scope, and strong safeguards of biometric technologies, so that individual agency, innovation, and Europe's competitiveness in global travel can be preserved.

2. Privacy and Security by Design

Responsible biometrics require the highest standards of data protection and cybersecurity embedded from the outset and consistently enforced throughout system design and deployment. Systems must operate with strict purpose limitation and data minimization, strong encryption and secure storage, robust access controls and auditability, proportionate retention periods, and full transparency for both users and supervisory authorities. What matters is not a single prescribed model, but that systems are demonstrably designed to:

- (i) Limit data processing to what is necessary and proportionate;
- (ii) Protect biometric data against unauthorized access or misuse;
- (iii) Ensure transparency and user awareness;
- (iv) Enable accountability through auditability and supervisory oversight.

Regulatory frameworks should remain technology-neutral, focusing on compliance with data protection principles rather than prescribing specific technical architectures. These measures reflect state-of-the-art technical and organizational safeguards already proven in EU border management systems and can be consistently applied to voluntary, user-centric biometric services across the travel chain.

3. Responsible Innovation Through sound and Controlled Experimentation

Creating a supportive environment in the EU in which innovative solutions can be tested within a clearly defined and controlled scope, so that the lessons learned can inform regulatory discussions, is essential. . PoCs, pilots and regulatory sandboxes [4] enable experimentation and help guide innovation with the

active participation of aviation operators and under the oversight of data protection authorities, allowing for controlled experimentation with clear objectives and measurable outcomes. They support evidence-based regulation, provide regulatory certainty, and encourage collaboration between authorities, industry, and civil society to build a coherent European model of rights-preserving biometric innovation across the tourism and transport sectors. This approach aligns with the EU's broader move toward innovation-friendly supervision in digital and AI policy.

Regulatory Call to Action

Responsible biometrics can deliver tangible improvements for travelers, operators, and public authorities alike: stronger identity assurance, shorter queues, smoother passenger flows, and more efficient use of infrastructure. They also form a foundational building block and enabler for emerging digital identity ecosystems such as the European Digital Identity Wallet, allowing secure, user-controlled verification across borders and sectors.

We respectfully invite European regulators to:

- **Reaffirm** consent as a valid and practical legal basis for biometric use in the travel and transport journey;
- **Ensure consistent interpretation and enforcement** of GDPR principles across Member States;
- **Preserve a technology-neutral framework** that does not mandate a single prescribed model, but instead supports models that are designed to comply with privacy and security; and
- **Establish experimentation initiatives** that allow authorities, industry, and civil society to jointly test, validate, and refine innovative models.

A coordinated public and private European approach is essential to unlock the full benefits of responsible biometrics while upholding the highest standards of privacy, safety, transparency, and fundamental rights.

Europe now has a unique opportunity to build an ecosystem where technological progress, fundamental rights, and the single market reinforce one another. The industry is committed to supporting this effort through a structured dialogue with European and national authorities, sharing technical knowledge and operational experience to help shape evidence-based policies that position Europe as the global leader in trusted, privacy-preserving, and citizen-centric biometric solutions.

Sources and explanatory notes

[1] The IATA Global Passenger Survey 2025 ([IATA Global Passenger Survey 2025](#)) highlights strong passenger demand for biometric and digital identity solutions:

74% prefer using biometrics instead of passports and boarding passes. Of the passengers who used biometrics, 86% declared satisfaction after its use.

78% want a single smartphone solution combining digital wallet, digital passport, and loyalty cards for airport processes.

45% are willing to share personal data to complete immigration procedures before arriving at the airport

Also, the ACI World – Airport Service Quality (ASQ) Global Traveler Survey sixth edition ([ACI World survey](#)) says:

The survey indicates that travelers’ willingness to use biometric solutions has increased substantially, reaching 72% in 2025 compared with 57% in 2021, highlighting a growing acceptance of biometrics as part of the airport journey.

Biometric verification is identified as one of the key solutions enabling passengers to arrive at the airport “ready to fly”, together with remote check-in and off-airport baggage drop, reflecting strong traveler interest in frictionless, pre-airport processes.

[2] [ACI Europe press release](#)

[3] For example, EDPB Opinion 11/2024 on the use of facial recognition to streamline airport passengers’ flow (compatibility with Articles 5(1)(e) and(f), 25 and 32 GDPR).

[4] A regulatory sandbox allows innovative technologies to be tested in real-world conditions under supervisory oversight, within a defined scope and with strong safeguards. It enables regulators to observe, guide, and evaluate new models before wider deployment, supporting evidence-based and proportionate regulation.