

GMS Flash Alert

Immigration Edition

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European Union - COVID-19 Certificates from Non-EU Countries

All nationals residing within the European Union (EU) are eligible for the COVID-19 digital certificate.¹ The EU Commission is aiming to connect neighbouring countries to the EU digital COVID-19 certificate system. Thus far, Switzerland², North Macedonia, Turkey, and Ukraine³ are connected to the EU's system.

On the other hand, travellers from the United Kingdom (U.K.) are experiencing challenges entering some EU member states with their COVID-19 certificates issued in the U.K. ⁴ as the U.K. is yet to connect to the digital platform for the EU's COVID-19 digital certificate.

WHY THIS MATTERS

The EU COVID-19 digital certificate proves that a person has been vaccinated against COVID-19, received a negative test result, or recovered from COVID-19. The digital certificate makes travelling safer and easier in the EU and its neighbouring countries that are connected to the EU system. For example, the certificate could mean that a traveller does not have to guarantine or get tested upon arrival nor does the traveller have to do so repeatedly after arrival.

Travellers from countries that are not connected to the EU COVID-19 digital certificate like the U.K. are subject to requirements that each member state sets out. For example, travellers can be required to provide a printed form of their COVID-19 certificate to enter the country or to enter public establishments such as bars and restaurants; travellers can be required to undergo mandatory isolation and testing upon arrival.

COVID-19 Digital Certificate

The COVID-19 digital certificate states that citizens are fully vaccinated against COVID-19, have tested negative for the virus, or are recovering from infection. The specifications about issuance, verification, and acceptance of the certificates

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are outlined in an EU Regulation⁵.

The connection of Switzerland, Ukraine, Turkey, and North Macedonia to the EU digital COVID-19 certificate system means that COVID-19 certificates issued in the named countries are accepted in the EU under the same conditions as EU members states' EU digital COVID-19 certificates. The agreements are reciprocal, which means that COVID-19 digital certificates issued in the EU are recognised in North Macedonia, Turkey, Ukraine, and Switzerland.

The U.K. has yet to join the digital COVID-19 system in the EU, which, according to some reports, is caused by technical issues. In the U.K., the COVID-19 certificate is available as an app in England and Wales, but in Northern Ireland and Scotland, the app is not accessible yet. This can make travelling from the U.K. to the EU challenging.

For example, U.K. travellers entering Italy must be in self-quarantine for the first five days and they must take a swab test within 48 hours prior to their arrival and again at the end of the five-day quarantine. Hungary presents a range of restrictions to U.K. travellers. For example, when vaccine status is required, the traveller's proof of status is accepted only if it is issued in Hungary. In such case, the traveller must possess a recent PCR test.

KPMG NOTE

The EU COVID-19 certificate is good for vaccines that are approved by the European Medicines Agency (EMA).⁹ Some non-EU countries have approved and used vaccines that are not yet approved by EMA such as Sputnik V and Sinovac. When an individual is vaccinated with a vaccine that is not approved by EMA, it is up to each EU member state to decide if it will accept that vaccine as sufficient proof of immunisation.

It is yet not clear how the different approval statuses of vaccines in the EU will be tackled by the EU system for COVID-19 digital certificates.

It is important for all travellers to inform themselves thoroughly about all travel requirements before each trip they take. The EU Commission has set up a website and an app Re-open EU that contains detailed information about travel restrictions in EU member states.

FOOTNOTES:

- 1 See GMS Flash Alert 2021-185, 28 June 2021.
- 2 Federal Office for Public Health in Switzerland (in English), "Can I use the COVID certificate for travelling?," (information extracted 26 August 2021).
- 3 European Commission: "<u>EU Digital COVID Certificate: Commission adopts equivalence decisions for Turkey,</u> North Macedonia and Ukraine," (19 August 2021).
- 4 See D. Boffey, "NHS Covid pass still not recognised in some EU countries," *The Guardian* (online), 24 August 2021 at: https://www.theguardian.com/world/2021/aug/24/nhs-covid-pass-still-not-recognised-in-some-eu-countries. (By clicking on this link, you will be leaving the KPMG website for an external site that KPMG is not affiliated with nor is KPMG endorsing its content; the use of the external site and its content may be subject to the terms of use and/or privacy policies of its owner or operator.)

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FOOTNOTES (cont'd):

- 5 Full text, <u>EU Regulation 2021/953 on a framework for the issuance, verification and acceptance of interoperable COVID-19 vaccination, test, and recovery certificates to facilitate free movement during the COVID-19 pandemic, (14 June 2021).</u>
- 6 See footnote 4.
- 7 Italian Ministerio della Salute (in English): "Covid-19 information for travellers," (information extracted 26 August 2021).
- 8 The U.K. government, "Foreign travel advice to Hungary," (information extracted 26 August 2021).
- 9 European Medicines Agency: "Human regulatory, COVID-19 vaccines," (information extracted 26 August 2021).

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Contact us

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The information contained in this newsletter was submitted by the KPMG International member firm in The Netherlands.

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