



EU ENTRY/EXIT AND THE UK BORDER

House of Commons European Scrutiny Committee

TA Written evidence submission

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About the Tourism Alliance

The Tourism Alliance is the umbrella trade association for the whole UK tourism industry – inbound, outbound, and domestic. We have more than 70 members who are all trade associations, member associations, or Destination Management Organisations (DMOs). Our members range in size from very large national bodies to small organisations representing niche but important parts of the tourism ecosystem.

Background

The introduction of the EU Entry and Exit System (EES) and the associated European Travel Information and Authorisation System (ETIAS) are significant changes to the way that travellers, including tourists, will plan for and cross EU borders in the future¹. Separately, but along similar timelines, the UK is also instituting its own Electronic Travel Authorisation system (ETA). Each of these systems brings potential challenge and complexity for tourists as well as businesses who facilitate their travel.

The underlying issue for the tourism sector is to make the introduction of these schemes as seamless, straightforward, simple and as little time consuming as possible. However, there are issues with each which

¹ The Common Travel Area with Ireland notwithstanding. Ireland will not be taking part in EES and therefore travel between the UK and Ireland should be largely untouched by these new schemes. Where we refer to EU travel in this document it refers to those EU countries who will be taking part in the EES and ETIAS schemes.

could make their introduction more difficult, especially at juxtaposed borders – a set of issues with which the Committee has already engaged through its previous oral evidence sessions.

The Committee will have already received information from authoritative sources regarding the proposed introduction timelines for these schemes, along with information about their legal basis, and the judged necessity of them from the various Governments involved. We will therefore constrain our comments to the impact on tourists and the businesses who facilitate their travel.

Leaving the EU has led to UK citizens now being treated as third country nationals for travel into the EU, similar in status to US citizens. There have already been implications of this change in status at the border for UK citizens, such as the need for manual checking and wet-stamping, along with more legal restrictions on activities and, importantly, maximum entry periods into the EU (the “90 days in 180” rule).

The EU’s decision to proceed with EES and ETIAS therefore impacts significantly on UK nationals (notwithstanding any exceptions that may apply to certain categories of traveller) travelling to the EU. In broad terms, the process at the border for UK citizens travelling to the EU will increasingly be much more akin to travelling to the United States than it was for travelling to the EU when the UK was a Member State. This is the natural consequence of the decision the UK took to leave the EU, the relationship between the two sides that was agreed to during the Brexit process, and the decision to proceed with EES and ETIAS.

There are significant issues that arise with this, however. Firstly, travel between the UK and the EU is much more common than to the US. Secondly, many tourists have been used to travelling with relative ease into the EU, even post-Brexit, with no pre-registration required (as will be required with ETIAS), and no need for biometric registration or confirmation (as will be required with EES). And many of our onshore facilities, especially at locations with juxtaposed borders, were not designed to cope with such a system whereby there will increasingly be a hard external border between the EU and a third country.

All of which is to say that there is potential for significant disruption for travellers as these systems bed in and while travellers get used to the new requirements at and before the border.

It is likely and forecasted that queues and waiting times at the border at EU ports will be increased from what is currently the case. It is already an issue that EU ports now require UK nationals to proceed to staffed inspection booths. We are not aware of any modelling by the EU institutions as to what the impact on queues at the border might be. The EU’s messaging is that “the main advantage of the EES is saving time,”² because of the reduced need to wet-stamp passports. This seems extremely unlikely as the need to enrol in EES in the first place, and the need to photograph travellers on subsequent border crossings is likely significantly to exceed the time needed to stamp the passport.

This is a matter of especial concern to travellers. Data from the IATA Global Passenger Survey 2023 shows that border control is among the top three pain points for travellers in their journey with respondents in particular highlighting “Too much time spent at border control, especially when travelling with kids.”³⁴

The particular issues at the juxtaposed border

As was drawn out in the Committee’s evidence session on 19 July 2023 neither the Port of Dover, nor St Pancras international terminal, nor the Folkestone Eurotunnel terminal, nor indeed the Le Touquet/Canterbury agreements, were designed with the expectation that there would be a hard external

² https://travel-europe.europa.eu/ees/general-information_en

³ <https://www.iata.org/en/publications/store/global-passenger-survey/>

⁴ <https://www.iata.org/en/pressroom/2023-releases/2023-10-25-01/>

border inside the UK with the EU. Neither, it appears, was EES designed with the particular challenges faced by those borders in mind. It is much more clearly designed for airport arrivals on EU territory.

Firstly, large numbers of vehicles – in particular coaches, caravans and motorhomes – travel through Dover and Folkestone which will need processing. Secondly, the physical set-up at Dover and Folkestone will mean that all passengers may have to exit their vehicle at least initially to enrol in EES with their fingerprints and to provide a photo. This may also be needed on subsequent crossing as it will be difficult for photographs to be taken and/or checked from within the vehicle. There is also apparent reluctance on the part of the EU to accept processing at Dover's Eastern Docks which would mitigate some of the space constraints for coach passengers.

The physical constraints at all three juxtaposed borders, but especially Dover, already present problems during disruption or during times of high demand. These are likely to significantly increase at the very least during the initial roll out phase when passengers and operators will be getting used to the system and when passengers will overwhelmingly need to undertake initial enrolment into the scheme.

The juxtaposed borders have been a significant success and have facilitated easier travel. However, the fact that border formalities take place before travel can result in additional stress during times of disruption. Passengers can miss their crossings and can have difficulty judging when to arrive at the terminal to begin the process despite the best efforts of the operators to provide accurate and up-to-date information.

As has been seen many times, disruption at Dover in particular, can have a knock-on effect on the local and regional road network, fouling up logistic networks, creating havoc for local residents, and having a huge reputational impact on the ports, the operators, the tourism industry, and – regardless of the justification – the UK Government.

Opportunities to alleviate the situation

The EU must announce the start date for EES and ETIAS immediately. Although 6 October 2024 as an EES start date has been reported it has not been officially announced by the EU and there is some doubt as to the veracity of that reporting. Clarity is needed for operators and businesses immediately as Ryanair made clear to the Committee in its written evidence⁵. This is vital in order for businesses and travellers to make the necessary arrangements.

The EU intend to launch a mobile app so that passengers can (but will not be required to) provide much of the information in advance of arrival at the border. We welcome this, however, details are currently scant. We understand that photographs will be able to be uploaded, but that fingerprints will still need to be collected at the border. The app, or at least far more detail about how it will work, need to be published immediately. In particular, we believe that it will be up to individual EU member states to decide whether to adopt the app for arrivals into their which is far from optimal as it will inevitably reduce the take up and add complexity for travellers who will need to look into this before travelling. It will be a clear barrier to acceptance and use from the travelling public.

In any case, a large-scale communications campaign on EES, ETIAS and encouragement to make use of the app (where possible) must begin ASAP. Travellers need to be made aware of these changes and how they can make their journeys easier.

We believe there is a role for the UK Government to work with the EU institutions on such a communications campaign given the likely impact on UK citizens and businesses as well as the potential reputational risk to all involved.

⁵ <https://committees.parliament.uk/writtenevidence/126960/html/>

We believe that travellers will be best incentivised to use the app to pre-register their details if there is a direct positive impact on their own journey across the border. It will be insufficient for travellers to think their doing it may have a marginal impact once they get to the front of an extremely long queue. To this end, we encourage the authorities to establish separate, faster lanes for those who have pre-registered with the app.

Longer-term arrangements

UK citizens being subject to EES and ETIAS is the natural, logical, and legal consequence of our leaving the EU. The UK was indeed part of the EU decision-making process in establishing these schemes when we were an EU Member State. Stepping back from the practical and logistical issues, we are forced to ask the question: is it really necessary? Are UK citizens more of a concern or threat to the EU than we were when we were EU citizens? It is certainly the case that freedom of movement has gone, but why are we making it harder, lengthier and more cumbersome to cross the border for tourism and trade? It is in fact in no one's interests.

We believe there is a case for exploring how to alleviate these matters and make travel between the two jurisdictions easier, not harder, through a comprehensive EU-UK mobility agreement as part of the Trade and Cooperation Agreement (TCA) review. This would be an opportunity to address EES and ETIAS, but also the 90/180 rule, establish an EU-wide Youth Mobility Agreement, and resolve school group travel issues, all of which we believe are possible without reopening the Brexit debate. These are issues for the next parliament, but which we believe are sensible and worthy of serious consideration.