

European Scrutiny Committee

Oral evidence: EU Entry/Exit and the UK border, HC 169

Wednesday 29 November 2023

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Watch the meeting

Members present: Sir William Cash (Chair); Richard Drax; Dame Andrea Jenkyns; Mr David Jones; Gavin Robinson; Greg Smith.

Questions 1 - 40

Witnesses

[I](#): Luke Petherbridge, Director of Public Affairs, ABTA—The Travel Association; Phil Smith, UK Coach Manager, Confederation of Passenger Transport UK.



Examination of witnesses

Witnesses: Luke Petherbridge and Phil Smith.

Q1 Chair: Good afternoon and thank you for appearing to give evidence today. In July, we heard from the Port of Dover, Getlink and Eurostar on the EU's soon to be introduced entry/exit system. As they facilitate juxtaposed border controls at their sites, they will feel the impact of entry/exit acutely. They told us about their particular concerns and preparations regarding the introduction of the system. Did you watch that? I presume you did.

Today, we will look at how entry/exit will impact the travel industry more generally, including passengers departing from the UK, from traditional non-juxtaposed ports, for the EU/Schengen area. We are especially interested in the preparations that airlines and coach operators are making to ensure that travellers are aware of the upcoming changes and your views on your own and the Government's responsibilities in this regard.

With the system now stated to be introduced late next year, we hope to hear further details on what it will entail. We appreciate, however, that this information is for the European Commission to provide and the UK Government to elicit. We will also ask about related systems, such as the EU's ETIAS and the UK's ETA, and we will ask for the thoughts of the travel industry on what seems like a proliferation of new digital border systems.

Our overriding concerns are, first, that the UK Government are providing the support and advocacy that your members require ahead of such a major change and, secondly, that next year does not roll around with the travelling public unaware of the new EU entry requirements that they are going to be facing.

Before we get started, then, for those watching at home, would you mind briefly introducing yourselves?

Luke Petherbridge: My name is Luke Petherbridge. I am director of public affairs at ABTA—The Travel Association.

Phil Smith: I am Phil Smith. I am here on behalf of the Confederation of Passenger Transport. We represent around 500 coach operators across the UK. I am the UK coach manager in that organisation.

Q2 Chair: By the way, as we go through, we want to look at the practical side of this. In the coach industry, these are big coaches. How will you handle that? Can people come out of the coaches? Do you have some ingenious method of speeding things up that you have put forward to the Government and to others, which they are not taking notice of? It seems to me quite extraordinary, with modern digital facilities, that it is taking so long. You might believe that is the case; maybe you think there is no way around it. I wanted to introduce that as a thought.



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If you think you have something practical to say on that subject, feel free to say it. We are hearing from a lot of colleagues that the mechanics of checking people out, really because of the nature of coach travel in particular, is probably the biggest problem. Is that right? Please do throw something out into the arena on that subject, if you feel you would like to do so, or if we have not asked that question in the way you think it should be asked.

I am asking the first question. As a Committee, we are experts in UK-EU affairs. Our expertise does not, with some exceptions—I am looking to my right—stretch to travel and tourism. For our benefit, would you briefly describe your respective industries, explaining those aspects that make them unique, which in a funny kind of way is what I was trying to refer to just now, and say why a fluid UK-EU border is important for you and your members?

Luke Petherbridge: Our members are UK travel businesses, primarily intermediaries. They are not always the carriers themselves. There are some exceptions to that, but they will primarily be tour operators or travel agents that have purchased travel arrangements from other providers. They are not in charge of the airline, the rail operator, ferry operator or whatever the case may be.

This matters to us quite simply because about 77% of all outbound UK holidays—our members primarily sell outbound holidays, but they do also sell some domestic holidays—go to the European Union. It is by far our largest outbound market. Therefore, we need to ensure that the flows between us and the European Union continue in a free fashion.

Q3 **Chair:** You have made that clear. To offer a thought on the theme I was putting forward before, why can people not be checked at an earlier stage in the journey—in other words, when they are going towards the port, rather than at the port?

Luke Petherbridge: Yes, the fundamental reason for that is that it is written in regulation that the check has to occur at the border. If there are checks prior to that, they have to be verified at the border. In reality, for coach travel, that means scanning the passports of each individual. Even in the event that there was an app or something that allowed some of the information from passengers to be taken downstream, you would still need to take fingerprints at the border, because there is not the technology to do that.

Q4 **Chair:** Do you have any technology that will enable you to speed up that part of the process? You could do it from the depot from which the coach made its way to the border, though I know there is always the problem of people impersonating other people and all that kind of stuff. Is this something you have been giving a lot of thought to?

Luke Petherbridge: I suspect that the industry's solution—Phil might expand on this—would be to take this away from the border and do it in a mobile fashion.



Q5 **Chair:** Will you deal with this later?

Phil Smith: Yes. It is interesting that you should raise this, Sir William. We were told in one of the HM Government workshops run by the Home Office that it would be a possible option for a frontier official to come on board the coach and use a tablet or an iPad to scan passengers' faces. I believe that has since been dismissed because of the angle that the device would have to be held at in order to take an accurate image. The issue about space on board vehicles for officials to move back and forth was also cited as a difficulty.

Q6 **Chair:** That is assuming they are sitting there in the coach for this purpose. If they somehow did it as they went into the coach, they could be static.

Phil Smith: I will come to that as well. Passport scanning technology is already available. Two of the ferry operators are using it for their own internal process of embarkation, when passengers leave the UK on coaches through the narrow straits. For the two ferry operators concerned, that saves a great deal of time when the coach arrives at the frontier on the quayside at Dover Eastern Docks.

As a layman and not a technological expert, I would have thought that between the European Union and the UK Government it might be possible to develop some form of application to process at least a part of the EES process. I accept it might not solve the issue of fingerprints. I believe it is written into the regulation that, despite the passenger having to pass through one of these kiosks to have their passport read biometrically and to have their fingerprints taken, et cetera, they still have to present to an EU state—

Q7 **Chair:** No one took my fingerprint yesterday when I came back from Madrid. You go through a visual recognition system. They do not ask you to put your finger on a bit of blue ink.

Luke Petherbridge: It is part of the new system that is coming in. With the EES, fingerprints will be part of the biometric checks that are required. That is not in place yet. It is due to come in at the back end of next year.

Q8 **Chair:** I am thinking out of the box, or in the box, really. I cannot understand why there is not a simple solution to this. Is it a frustration for the people on the coaches and so on?

Phil Smith: We would be very pleased if a proportion of the EES process could be conducted away from the border itself. Given the tech app developments that have taken place at two of the ferry operators—the third one is probably working on something as well—some adaptation of that by the EU, because it is an EU scheme at the end of the day, ought to be possible to remove at least some of the more routine bits of EES, such as the scanning of the passport.



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We are reliably informed that each initial transaction through one of the kiosks will take up to 1.25 minutes, because everything has to be downloaded. The person is then clear for the next three years. If they get a new passport or the three years expires, the next time they go through, it all has to be done again. It is going to be a rolling ball, inasmuch as there will always be people with new passports; there will always be people who have not been before. Anything that can be done to take some of this process away from the physical border would be very welcome.

Q9 **Greg Smith:** Continuing with the theme of the Chairman's questions, it is clear that the fingerprint and photograph position is going to be difficult. Can you take us through some of the other impacts the entry/exit system is going to have, particularly on your sector, Mr Smith, and on the wider travel sector, Mr Petherbridge?

Phil Smith: In terms of coaches, currently everybody has to get off the vehicle and have their passport ink-stamped. Depending on the physical ability of the people on board the vehicle, that can sometimes be a quicker or slower process.

With EES, that time is going to be increased significantly, because everybody is going to have to troop through a kiosk. There will be the inevitable issues about some people not realising what they have to do once they get into it, because it will be the first time they have done it. Even if it is not the first time, they will still struggle. There will be a further queue to present themselves to the frontier officials so they can have their passport scanned. It will slow the whole process down.

The pivotal issue for us will be how many kiosks are going to be physically present at Dover Eastern Docks. For us, that is the location that really holds the key to the future of international coach travel post EES. If we get this wrong, I can see international coach travel becoming very difficult to maintain on a consistent basis in volume, because so much of the traffic goes through Dover.

Q10 **Greg Smith:** What does your modelling show to be the expected delays for a coach when the passengers in all 52 seats or whatever are fresh to the system?

Phil Smith: It is a good question. It really depends on the number of kiosks that are installed. For example, if there are six kiosks, it could take 12 to 15 minutes to get one coachload or 50 passengers through. If there are fewer, it is going to take longer.

We see spikes in coach traffic through the narrow straits at certain times of the year, such as post Christmas when the schools go skiing and then again at Easter. The two main spring and summer school holidays create additional peaks as well. Just to give you an example, we believe around 70,000 coaches a year go through Dover and the Eurotunnel altogether.



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It is about 3 million passengers. That is not evenly spread. If you went down there today, you would probably only see one or two coaches.

As we know from past events and the media coverage they attract when things slow down, it does not take a great deal of disruption to the pattern of processing for difficulties to arise, with all the resultant problems in the town of Dover and the impact it has on the people who live there who have to go about their normal business.

Q11 Greg Smith: Just before I bring Mr Petherbridge in, there are clearly other borders that coaches cross. Where in the world offers the best solution for this? Is it the United States to Canada or the United States to Mexico? These are countries that are pretty well renowned for having secure borders.

Phil Smith: It is difficult to find an example. It might be worthy of further investigation to look at USA-Mexico, but it is not really a like-for-like comparison. The narrow straits are very unique because of the coach volume. I am sure coaches go through the US border into Mexico and Canada, but this concept of coaches going across into the EU has been developed over 70 years. It is a very popular means of travelling internationally, particularly for school groups and older people who do not like to fly. It is very eco-friendly. As an industry we distribute about five times less carbon than a journey by air. It would be a real shame if what is really an administrative challenge destabilised and ultimately destroyed the international coach travel market.

Greg Smith: It was not a particular challenge before we regained our sovereignty either.

Phil Smith: Indeed, yes.

Luke Petherbridge: I will pick up on what Phil was saying. It is about volume and velocity. If we look at the juxtaposed borders, particularly at Dover but also for the Eurostar, there is not the capacity to have large numbers of people dwelling at those border checks. It is the juxtaposed nature of the border checks that makes them unique. As Phil said, I am not sure there is an international comparison that quite works because of the juxtaposed nature of the border.

For us, the primary concern around the entry/exit scheme is pinch points. Yes, it is about the juxtaposed borders in particular, but picking up on what Phil said about seasonality, this is true of all travel and tourism. We should not dismiss the risk of disruption in aviation, particularly at small regional European airports or those that have very large volumes of UK travellers at specific times, whether that be the summer peak, during half-term holidays in October and February or, indeed, over Easter.

When we look at the specific sectors that we have concerns about within our membership—Phil touched on this a couple of times—school travel in particular does have a reliance on short straits travel, particularly through



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Dover at the moment. Eurotunnel has reduced its capacity for coach travel, which has pushed more coaches into Dover. Back at Easter we saw what happens when full border checks are enforced. There were significant delays.

Our members in the school travel sector have very long lead-in times. That is very important. They have 12-to-18-month lead-in times and booking windows for schools who book these trips. If you have significant delays one year, it knocks on over more than one season. You are then looking at dissuading travellers in future years, who look at it and think, "I cannot have kids from this school sat at the border for hours on end." We saw delays of 11 to 15 hours over the Easter period. There are safeguarding concerns when children and other vulnerable groups of travellers are on those coaches.

Q12 Chair: You mentioned emissions. I do not know enough about this to know whether you are into electrical power systems in coaches. Is that on the agenda at all?

Phil Smith: It is on the agenda, as is potentially hydrogen. I could probably spend the whole afternoon telling you about where that is going.

Chair: I just wanted to know that, because you did mention emissions. An electric-operated system would be a great improvement.

Phil Smith: I would say one other thing about international coach travel at the moment and zero-emission vehicles. The ranges available from electric vehicles specifically are still quite challenging, in terms of some of the long distances that these vehicles have to travel across Europe once they have crossed the border.

Gavin Robinson: It is the perfect time to say that Wrightbus in Northern Ireland does a great range of battery-powered electric vehicles.

Phil Smith: It is working on a zero-emissions vehicle.

Q13 Gavin Robinson: Thank you, Chair, for that. There are no advertisements from Parliament, and I have no interest to declare.

Gentlemen, we heard back in July from John Keefe at Getlink. He talked about not only the severe delays associated with the entry/exit scheme, but the aspiration that the information would be available by October. We are at the back end of November. Do you have final specifications?

Phil Smith: No, in a word. We were informed at the end of last week by Port of Dover that the EU has still not made clear the type of spec that it needs to follow in terms of the kiosks. There is an immediate obstacle in terms of planning installation. The EU has not as yet confirmed exactly what is required.

Q14 Gavin Robinson: Are you doing all of your engagement—I will ask Mr Smith first—through Dover? Is that the primary engagement, or are you having direct engagement yourselves?



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Phil Smith: It is a significant partner in terms of engagement, but I have to say that, in terms of operational communications, the Home Office has been running readiness workshops for this. I have been to about three of them. They have been very useful. They are in the same position; they are reliant on the information they can extract from their colleagues in the EC.

Q15 **Gavin Robinson:** ABTA is in exactly the same position. Do you have your own direct engagement? More importantly, we were told in July that the final specification would be available in October. Do you have any sense today of when the final specification will be available?

Luke Petherbridge: My understanding on the specification is no different to Phil's. We are still waiting for the final details. That impacts not just the ports and operators at the juxtaposed borders but everybody, including the airlines, which will need to put systems changes in place to facilitate these as well. That is a very significant challenge for the entire travel industry.

In terms of our engagement, we engage politically directly, but when it comes to the operational matters, we rely on the carrier associations, people like Phil, Dover and those that are going to be operationally impacted. As I mentioned earlier, our members are primarily intermediaries. They are one step back; they are not operating the ferries or airlines themselves.

Q16 **Gavin Robinson:** Knowing what the final specification is would allow you and us to discern what roll-out periods, trial periods and flexibilities there may be within this. In all of the engagement either of you have had up until now, do you have any sense of where those considerations may land, albeit not in a final form, or do you see this as a moving feast, where there will be changes in each of those parameters?

Phil Smith: There are two points here. First, it was made pretty clear to us a few months ago that it is unlikely this will happen before the Paris Olympics next summer. The consistent theme has been October 2024.

More recently, there has been some suggestion that there might be trials, but it has been very loose, I have to say. A trial would be very sensible. I do not know how you would do it. Every 10th coach going through could be subject to a trial, just thinking off the top of my head. Again, it seems to be very unclear whether this will definitely happen in October. If so, where will the vehicles go in Dover to be processed? Will the Port of Dover have all the necessary information to move this project forward before autumn 2024?

Q17 **Gavin Robinson:** Do you agree with that?

Luke Petherbridge: The latest information from Frontex is that it will be late 2024 for entry/exit checks. ETIAS, which is due to come on six months later, would then be mid-2025.



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Q18 Gavin Robinson: At this stage, have you crystallised in your mind what sort of lead-in period you would require, if this is to go live? What is the industry saying? Do you need a trial period of six months, eight months or nine months?

Luke Petherbridge: Our members have expressed concern with any implementation period below 12 months. We have a secondary concern, which is that six months after the entry/exit system scheme is switched on, we will also have ETIAS. That window of six months is also a concern for the industry. It would prefer a longer lead-in time between the two systems.

Port of Dover is certainly on record as saying that it would have liked 18 months. It was saying, "We need specifications now" back in July. As we have said, we still do not have that specification yet.

Phil Smith: I did not completely hear your question, but it is fair to say that, in terms of the lead-in for EES, yes, trials would be good. Secondly, as soon as we know exactly what is required of our operator members and our passengers, we can start working out ways of making coach passengers and users aware of the changes, and getting everybody into the mindset of what will happen, how it will happen and where it will happen on arrival at the frontier. At the moment, we cannot tell anybody anything because everything is so fluid.

Q19 Richard Drax: Good afternoon. Just for the viewers and for me, if I am a passenger on a bus, what biometric information would the border guards need exactly? You would have to show your passport.

Phil Smith: Yes.

Richard Drax: What else?

Phil Smith: Again, we have not seen a practical demonstration, but fingerprint taking is involved. I am making an assumption, but presumably, as well as their passport going into the scanner at the booth for it to be read and for all the personal data to be downloaded into the EU's database, a passenger will have to put their hand in as well, so it can take their fingerprints.

Richard Drax: It will happen at the same time as they take your photograph.

Phil Smith: Indeed, yes.

Q20 Richard Drax: It will be rather like the things you go through now at airports. You put your passport in, and it takes a photograph of you. It identifies you and then through you go.

Luke Petherbridge: It is a very similar system to the US ESTA. You are looking at facial recognition, biographical information from your passport and your fingerprint. It uses your fingerprint because that is something that belongs to you and is completely immutable.



Q21 Richard Drax: Will it be practical? Let us say you are a bus passenger. To do all that, 50 people have to get off the bus into a terminal where there are lots of check-in points, you hope. The driver goes through his or her own little checkpoint. The cars keep going. You go through and rejoin your bus. Is that the sort of thing that will happen?

Phil Smith: That is effectively what will happen. That is kind of what happens now, but it is the additional time that these extra requirements will take to process.

Returning to the Chair's earlier point about pre-validation, if we could get to a position where the passport is scanned before somebody even leaves home, for example, or the driver has the ability to scan the passport by way of an app, it could save a great deal of time at the frontier. It may then just be a case of facial recognition, which is somebody staring at a camera, and putting their hand in the scanner to get their fingerprints. That would potentially take out about 50% of the time of the process.

Q22 Richard Drax: Mr Smith, you are saying that the impact on a family or person from a non-Schengen area country going through border control to enter the EU or Schengen area from the UK is very hard to gauge right now. You cannot answer the question. Is that fair? It will certainly go up.

Phil Smith: Yes, it will increase. We were given an estimate by one of the Home Office workshops. They forecasted that the initial transaction would be 1.25 minutes per person. That assumes that they do not make mistakes during the induction process.

Q23 Richard Drax: For a busload of 50 people, that is nearly an hour.

Phil Smith: Yes. Again, it depends how many booths you have.

Richard Drax: Yes, and how many buses you have.

Phil Smith: Yes. On Maundy Thursday there could be 250 coaches.

Q24 Richard Drax: It sounds like there is the potential for a nightmare.

Luke Petherbridge: Yes. That is where you get into the capacity issues and the infrastructure at the port. There simply is not the space to store that number of coaches.

Q25 Richard Drax: You are not going to have 50 border guards, are you? These are French border guards.

Phil Smith: To be fair, we have been seeing at peak time six and seven border guards on the existing system. One of the issues in the spring was that there were not enough frontier supervisors. Between them, Port of Dover and the French authorities addressed that. We have largely seen the delays disappear since then, but EES brings a whole new set of challenges into the mix.

Q26 Richard Drax: For those who have given their biometric data, do you have any idea how long it will take them to go through within the three-



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year period? Will it be quicker? Will they say, "You can just keep going"?

Phil Smith: No, we have not been given an exact time amount, but we are assured it will be significantly quicker the second time around.

Luke Petherbridge: It is quicker once the initial registration has taken place.

Q27 **Richard Drax:** Based on the period of three years, on a year-by-year basis, how many people who travel with your members will be repeat travellers and how many will need to register for EES for the first time? Many bus travellers travel quite frequently. It is almost an annual event, is it not?

Phil Smith: There will be a demographic split. When a lot of the school groups are going through, you will find that they will be first-timers. With the tourists, who are predominantly people of a more mature demographic who tend to be regular travellers, other than issues like mobility and things that sometimes happen with older people, you might find that after the initial trip through the border, the subsequent trips become a bit quicker because they do it so often.

We have to bear in mind that the times we have seen these issues with processing people at the border have been when the schools are on the move. My forecast is that a lot of those will be first-timers. For example, we would hope that, when this system comes in, it will be embedded in time for when the ski season starts, which is when a lot of school groups travel to the continent. We would not want it to come in at the start of that.

Luke Petherbridge: That is a really important point. That switch-on point and how this is timed with the peak periods for travel will be really important for the initial implementation of the scheme. We are going to have a bulge of first-time travellers initially because they have never had to do this before.

Q28 **Richard Drax:** The moral of the story is: do not be on that first bus.

Luke Petherbridge: The message we would give is: turn it on at the correct time. Do not turn it on at peak travel periods. That applies to both regimes, the entry/exit scheme and ETIAS. Avoid turning them on at peak periods.

Q29 **Richard Drax:** Just finally, you have six to 10 or however many buses in a queue waiting to get through. There are six border guards. You have 50 people in each bus. Maths was not my strong point. You are looking at several hours for that last busload to get through.

Phil Smith: Again, I would refer you to my earlier answer regarding the number of kiosks, because the critical thing here is how many kiosks are actually available.

Q30 **Richard Drax:** These are French-manned.



Phil Smith: On this side, at Dover, yes.

Richard Drax: These are French people who are on the kiosks.

Luke Petherbridge: At the juxtaposed borders, yes.

Q31 **Richard Drax:** I am just wondering whether they are going to be willing to put a lot of checkpoints on this side.

Phil Smith: Hang on. There are two things here. The first issue is the kiosks, which will be standing infrastructure. It is my understanding that Port of Dover will be responsible for installing and providing those. It will really depend on how much money for investment it has available and, crucially, how much space it has to install what is perceived to be the right number of booths.

Frontier staff is a French issue. In fairness, after we had the initial problems in the spring, there appear to have been fewer issues with the number of French border officials in situ at the juxtaposed border since. It would be my view that, post EES, because the border guards still have to supervise all this and scan passports, if it is busy, there will be six or seven of them with six or seven scanners to make sure that the flow of people coming through the kiosks happens in an efficient way.

Richard Drax: I have encroached slightly on the next question, so I am going to hand back.

Q32 **Dame Andrea Jenkyns:** We heard in July—this is pre my time; it is my first time today—that for juxtaposed border controls in the UK, there was limited physical space, which poses an issue in preparing the infrastructure required. Are certain types of travellers more likely to be impacted by the EES, especially when they primarily travel by coach or ferry, for example? I know you have mentioned children going on school trips.

Luke Petherbridge: At the juxtaposed borders, the primary concern is going to be coach passengers. There are some large demographics, such as schoolchildren and, as Phil mentioned, the elderly. Those would be the two demographic groups. That is the concern at the juxtaposed borders.

As you suggested in the question—it was covered in July—there are significant capacity problems at both Dover, where there simply is not the space to increase the checks around the port, and the Eurostar terminal. Anyone who has been through St Pancras will realise that it is a very busy international station.

Q33 **Dame Andrea Jenkyns:** Will people be dissuaded from travelling in the future?

Luke Petherbridge: This is why we need both the Governments on the other side of the channel in the European Union and the UK Government to increase the political prioritisation this is given.



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Q34 **Dame Andrea Jenkyns:** Both sides need to get their acts together, do they not?

Luke Petherbridge: We need solutions that do not require all these checks to occur at the border. If they do, you are looking at serious slowdowns. Yes, that would then dissuade people.

Phil Smith: I would reiterate what I have said already about having as much pre-departure processing as possible. If there were an option for coach drivers to scan passports en route to the channel port, the amount of time it would take the passengers to go through the kiosks and present themselves to the frontier official would be significantly reduced.

During the whole EU exit process, there has always been lots of talk about making the best use of the technological advances that have been made in the last 10 years or so. This is a classic example of where technology could go a long way to solving this issue.

Q35 **Dame Andrea Jenkyns:** Yes, I completely agree. As we know, the EU is planning to introduce the European travel information and authorisation system, which is an additional travel credential. The UK has just introduced the electronic travel authorisation system. It is a real mouthful.

Is there a concern in the travel industry that the proliferation of new systems will dissuade people from travelling? Are you aware of any co-ordination between the UK Government and the European Commission on the introduction of these new systems?

Phil Smith: In terms of ETA, that is relatively straightforward. We are generally satisfied that HM Government are taking a measured and cautious approach to its introduction. It is an issue for our members that are involved in the inbound tourist market. People who are coming into the UK have to have one of these. Ultimately, it will be for every country whose citizens do not require visas. It is being done in such a way that they can iron out any issues that arise. So far I am not aware of any coach operators having any difficulties with it. We are reasonably relaxed about ETA.

With the other one—I also have to get the initials in the right order—ETIAS, which is the EU version of ETA, has been subsumed a bit by the juggernaut, no pun intended, of EES. My understanding is that it is going to cost €7. People technically will have to apply two working days before travel. That is fine; they can do it at home. Even if they do not do it at home, it is potentially achievable to apply when you are on the coach. As long as you are not an international criminal of some description or wanted in a particular country, you should be able to get a successful application.

Dame Andrea Jenkyns: We ought to be challenging them when they come over to us.



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Phil Smith: I agree with Luke's point that we have to be cognisant of it. At the end of the day, if it was just ETIAS that was coming down the track, we would be relatively comfortable about how we explained that to our passengers, making sure that it went out in marketing material and publicity. "For next summer, you have to do this". It does not have the time constraints that EES imposes.

Luke Petherbridge: I would primarily agree with that assessment. ETIAS is very similar to the US ESTA and the Canadian eTA. We have two concerns around ETIAS. One is consumer awareness. As we saw with the passport validity problems post Brexit, this can catch travellers out. We do need to ensure as an industry—and Government also have a role in this—that UK travellers are aware of it before they travel for the first time once the system is turned on.

The other aspect of ETIAS where we would have a slight concern is around fraud. That is essentially about online scams and people offering to sell ETIAS to UK travellers when the system is not live yet. If you go online now and search for "ETIAS", you can be sold ETIAS online although it does not exist. Again, there is a role for the Government to play around consumer awareness.

Q36 **Greg Smith:** My question is for Mr Petherbridge. I would like to talk about air travel. Do you represent any airlines?

Luke Petherbridge: We have airline-owning tour operators, such as Jet2, TUI, EasyJet and Virgin Atlantic.

Q37 **Greg Smith:** We have had evidence—in fact, you have touched on this already—that United Kingdom airports are less likely to be affected by EES because there are no juxtaposed controls. However, British travellers will be travelling into European airports in the Schengen area. How big of an issue will EES be for British passengers flying into the Schengen area?

Luke Petherbridge: Again, there might be a pinch-point issue when it is first turned on, particularly if that is done at periods where there are large volumes. This may cause queues at smaller regional airports where they do not have the physical infrastructure to cope with large volumes of travellers or airports where there are very large volumes of UK travellers arriving in Europe. I would not expect those queues to be anywhere near the length we see at the juxtaposed borders because airports are more used to dealing with these issues, but, yes, we do have some concerns around initial disruption and initial queues.

Q38 **Greg Smith:** You mentioned the smaller regional airports. A number of British and Irish airlines, Ryanair in particular, fly to these so-called secondary airports, which I would have thought were less able to cope with the pressure of EES. It would be a pretty significant capital investment for those airports. Are they going to be able to discharge that?



Luke Petherbridge: I suspect they will, but it will require the Government in destination to be alert to this problem coming. Some airports in Europe have already adopted measures to help the flow of UK travellers. For example, in some Portuguese and Spanish airports where there are large numbers of UK travellers, there are already additional border checks. They will allow a minimal check and then verification by a border guard. You already see some attempts to smooth the border flows. I suspect you will see that in destinations with large volumes of UK travellers.

Q39 **Gavin Robinson:** Gentlemen, we have talked about specifications and how much preparation and planning you can do with the lack of specifics you have at this stage. Knowing that there will be a process and knowing that your members are the ones that will be receiving the ire of the public, should it prove problematic, do you have a moral obligation or a responsibility to indicate in advance what is required and that there may be disruption? Do you have plans in place with your partners or members as to how that may be rolled out? If you do, can you share those with us?

Luke Petherbridge: Yes, ABTA has quite a well-known consumer brand. We absolutely see it as part of our role to inform customers about changes to travel. We are looking at putting up information on our website for consumers to make them as aware as we can at this point that these systems are coming. Indeed, for the UK ETA we already have some advice for inbound travellers as well. We will be doing that from a UK travel industry perspective.

Where I would slightly push back is that we do not know the specs; we do not know exactly what is required yet; we do not know the date this is coming into entry, so it is difficult. We cannot give much information at this point, but we absolutely see a role for industry, as well as Government, in getting those messages across.

Q40 **Chair:** That point about the Government is really important. Have you had discussions with them about making travellers aware of the new requirements?

Luke Petherbridge: Yes, we have very strong relationships with the Foreign Office and the Department for Transport. We are making these points to them. In fairness, we do not have a switch-on date yet, so there is not an ability to do that, but we will continue to make that case.

Chair: That is really helpful and very interesting. It has given us a new dimension of your industry to look at. I was in Madrid airport yesterday. I was surprised at how few people there were around. It struck me as very odd. I could not quite understand why. That is not really your problem, is it?

Phil Smith: It is strange that you say that. I was in London yesterday. When I travelled home to the north-west, the train was quiet and Euston



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was quiet, and I thought central London was quiet given that it was a weekday in November. I do not know.

Chair: There might be some other reason. Anyway, thank you very much for coming. It has been very interesting and informative.