

Sir William Cash MP
Chair, EU Scrutiny Committee
House of Commons
SW1A 0AA

16 April 2024

Dear Sir William,

Follow Up to EU Scrutiny Committee's Evidence Session on the Impact of EU Entry/Exit System

P&O Ferries was grateful for the opportunity to appear with Logistics UK and DFDS before the EU Scrutiny Committee to give evidence on the expected impact of the EU's Entry/Exit System ('EES') on operations at the Port of Dover and the Short Straits. As I explained at the time, I focused my remarks on the Port of Dover, because the juxtaposed border controls in place at the port create a unique challenge to the smooth implementation of the EES as it is currently envisaged.

The EES process was designed for pedestrian passengers passing through an airport, and is fundamentally unsuited for a port environment. The very high volumes of passenger and freight passing through the Port of Dover are impossible to separate into distinct streams for processing given the existing layout of the port. We therefore do not see how serious disruption can be avoided as the result of having to process each passenger individually (most of whom are in cars or buses) on the port estate. Mitigating this is beyond the control of Dover Harbour Board or ferry operators.

Our recommendation is for the UK Government to hold discussions with the French Government to rapidly secure a delay to the implementation of EES to October 2025 specifically for ports with juxtaposed border controls. This would allow time for a digital solution to be developed which could enable passengers to be processed before they arrive at the port.

Collaboration between the UK and French Governments and the European Union will be necessary to develop a digital solution which needs to be compatible both with EES and the Electronic Travel Authorisation which the UK is introducing over the next year.

You asked for further detail on exemplars of digital solutions in operation elsewhere. As an Appendix to this letter I have outlined examples of biometric checks being tested in

Europe and beyond that may offer a solution. This includes the contactless biometric immigration clearance system currently being used by Singapore's Immigration and Checkpoint Authority.

The examples highlighted demonstrate the useful international experience the UK and French Governments can draw upon to develop a bespoke solution. The examples also demonstrate the rapidly evolving technology that exists in this area.

Once again, thank you for the opportunity to give evidence on the impact of implementing EES. The Port of Dover is a critical element of the UK's logistics infrastructure, and if mitigating action is not taken, we fear that significant disruption here is inevitable. This will have serious consequences for the UK's economy and reputation internationally.

I trust that the information attached is helpful to the Committee as it considers this vital issue; please do not hesitate to contact me if you have any questions or would like to discuss it further.

Yours sincerely



Jack Steer
European Operations Director, P&O Ferries

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Appendix – Examples of Biometric Checks

Biometrics are increasingly prominent at border crossings as a way to manage immigration access and traffic flow.

Frontex, the EU agency for border and coast guard cooperation, invited evidence from companies to provide border check solutions¹ including the opportunity to demonstrate products during regular industry events². Many of the solutions to date have, however, been aviation focussed and not suited to the unique circumstances in Dover with car traffic and juxtaposed controls, however, the technology is developing quickly. Areas under investigation have included:

- pre-registration self-service solutions;
- biometric and document check tools;
- self-sovereign identity (SSI) solutions (similar to those used by some UK banks to verify identity remotely);
- mobile border checks and other handheld border check devices; and
- secure QR code solutions.

However, Singapore's Immigration and Checkpoints Authority (ICA) began trialling a contactless biometric immigration clearance system since 2022. They have recently begun rolling out a new system will allow car travellers to enter the country by scanning a QR code on their mobile device and verifying their identity using face recognition technology without leaving their vehicle³.

Meanwhile, the U.S. Customs and Border Protection (CBP) agency have been trialling innovative facial biometric checks across different transport modes including car passengers in a pilot in Texas. This uses facial biometrics to automate the manual document checks required for admission into the United States and provides travellers with a secure, seamless experience. Note that this has gone no further than pedestrian and aviation.

¹ <https://www.frontex.europa.eu/innovation/announcements/call-to-industry-remote-and-mobile-equipment-for-border-checks-Ej5QHE>

² https://www.frontex.europa.eu/assets/EUresearchprojects/2023/Conference_on_innovative_technologies_for_Schengen_-_Report.pdf

³ <https://www.ica.gov.sg/news-and-publications/newsroom/media-release/update-on-ica-s-qr-code-initiative-at-woodlands-and-tuas-checkpoints>