

Written evidence submitted by Confederation of Passenger Transport (EEE0006)

Commons EU Scrutiny Committee Written submission

CPT UK a brief introduction

CPT is the primary trade body for the road passenger transport sector in the United Kingdom with over 700 member coach & bus operators ranging from the largest publicly listed organisations to the smallest operators that are usually family owned and it is mainly these smaller enterprises that will be impacted the most when EES is introduced.

The implications of EES at the “juxtaposed UK Border with the EU/ Schengen area

Introduction of EES is likely to increase the time it takes to process non-EU nationals passing through the border into the EU/Schengen area, with the potential for that increase in time likely to be significant.

Excessive delays particularly at Dover / Eurotunnel where large numbers of coaches cross the frontier, and the Border is juxtaposed represents a threat to the future of international coach tourism if Border resources do not match passenger numbers, particularly at peak times. Delays could result in rendering international coach travel unattractive & therefore loss of much needed business for many SME coach operators – 8 out of 10 coach operators are family owned, 7 out of 10 own less than 15 vehicles.

EES monitoring of movements into & out of the EU/Schengen area will also introduce a much more stringent enforcement of how much time crew members: e.g. Drivers & Couriers spend within the EU territory & whilst only a limited number of such individuals spend large single “blocks” of time within the EU, a far larger number of them visit for short periods of time on multiple occasions. Electronic recording of entry will mean much less flexibility for both coach operators & their employee’s when deciding which employees to allocate to these duties.

Therefore, some flexibility for coach drivers & couriers in relation to the “90/180 day rule* for those crew members who are based in the UK and always return to the UK within a specified period of time: e.g. 28 days would ensure that efficient scheduling & planning of crews can continue.

There must be sufficient port infrastructure available at the “juxtaposed” Border points at The Port of Dover & Folkstone (Eurotunnel) to ensure efficient processing of outbound passengers. – Typically, 50 passengers on a coach and we are told initial process takes 1.25 mins per person due to biometric download. Therefore, taking around 70 mins in total for one coach! At least **Six booths** or more would reduce this processing time to around 12 minutes per coach.

The available space at The Port of Dover for installation of EES related infrastructure is severely limited and the EU’s apparent reluctance at present to agree to EES processing at a remote location away from Eastern Docks which would ensure more opportunity to install the maximum amount of so called “kiosks” to enable as much foot fall through the Border as possible at any given time.

Remote processing would simply mean a coach being sealed once passengers have been processed by EES for approximately 0.5 miles between the remote clearing point & the dock where the coach embarks onto the ferry etc.

The EU’s promise of an “app” to be available when the EES system is introduced, must be fulfilled – this would allow users to partially complete the EES process **BEFORE** they pass through the Border. It is essential that the EU are held to this stated objective. It is also very important that France adopt the app as soon as it is available because it is believed that each EU member state can decide whether or not they do so or not.

International travel via the “narrow straits” key statistics

70K coaches a year currently take UK travellers into the EU/Schengen area via this route. An estimated 3 million passengers.

Key groups using coaches for international travel:

- School & College groups.
- Older people.
- Mainstream tourists preferring not to fly.

***Environmental benefits of coach travel**

- Average coach Co2 emissions five times lower than travel by air.
- One coach can eliminate up to 50 separate car journeys.

**According to the 90/180-day rule, non-EU/EEA nationals can stay in EU member states of the Schengen Area for a maximum of 90 days within any 180-day period. The rule applies to cumulative stays within the Schengen Area and is calculated backward from the date of entry.*

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