

Written evidence submitted by ETOA - European Tourism Association (EEE0009)

ETOA (European Tourism Association) is an international trade association of 1,100 members conducting business across Europe. It was founded in 1989, is now based in Brussels, with a commercial and operational hub in the UK. Our membership includes tour operators based world-wide, European destination management companies, accommodation providers, visitor attractions, transport operators and national/local tourism boards. ETOA lobbies and participates in meetings with EU institutions, national and local governments. Cross-border travel policy is closely followed (both UK outbound/inbound) and ETOA is part of the European Commission advisory group on ETIAS communication with other industry associations and FRONTEX (EU's border and coast guard agency).

1. The EU first proposed an entry/exit system for the Schengen Area in February 2008. How have proposals for its introduction developed over the last 15 years?

The Entry/Exit system (EES) is part of a long-term [strategy for the Schengen Area](#) to modernise and manage the 'external border', thereby supporting freedom of movement within the zone. 29 countries will be implementing EES (25 EU and 4 EFTA member states). This may increase to 30 if Cyprus's application to join the Schengen Area is approved. Ireland will not implement EES.

The UK opted out of the Schengen Aquis while a member of the EU, and therefore, the UK would not be implementing EES had the UK remained a member. Nevertheless, EES would still have had an impact in the UK on the non-EU/non-EFTA ('third country') nationals travelling from the UK to EES countries. However, the impact and challenges of introduction, particularly at ports with juxtaposed controls has significantly increased due to the UK leaving the EU and the EU Single Market, as British nationals (not resident in an EES country) will now be subject to EES as 'third country' nationals.

2. Are there currently any other domestic or transnational systems either planned or in operation that are similar to EES?

USA ESTA, Australia ETA and Singapore all operate system with similar effect.

3. The EU's Entry/Exit System was initially due to be introduced in 2022. What challenges do the EU and its Member States face in ensuring the full introduction and effective operation of EES?

New technical (IT) & physical infrastructure is required at all 'external border' ports for the collection of biometric data and to register a traveller's entry and exit from any of the 29 EES countries. The challenge of effective operation is enhanced at ports with a high number of third country nationals arriving at border control at the same time e.g. major airports, cruise terminals and land ports with limited space for additional facilities including passenger/traffic management. Whether sufficient testing takes place to ensure adequate flow management at peak times is a key question. Implementation remains a member state competence, whose progress the EU monitors.

4. What challenges will 'third country' (non-EU Member State) ports and operators face servicing destinations in the Schengen Area when EES becomes fully operational?

Border processing times are forecasted to increase due to the collection of biometric data required. This could affect a port's passenger/traffic management plans. At ports where passengers arrive in a vehicle, there is a health and safety concern if travellers are required to leave their vehicle where there is moving traffic to submit their biometric data.

Carrier itineraries could also be impacted by the increased border processing times e.g. disembarking a cruise, disembarking a ferry where this is limited space for vehicles to queue, as well as driving and rest time regulations for professional transport operators affected by traffic delays. On ferry journeys where border control is carried out on arrival, a place on board a ferry where it is permitted for a third country national to submit their biometric data during the journey, ahead of verification at border control, could help to mitigate any delays.

5. How will EES affect the travel experience of third country nationals?

Replacing passport stamping is a beneficial change reducing the cost of replacing a passport for frequent travellers and reducing processing time.

We understand a mobile app is being developed by FRONTEX to capture a person's facial image in advance which should help reduce processing time at border control, where the border official is only required to verify the image captured. However, it will not be obligatory for a traveller to use the app in advance, and neither will it be mandatory for countries implementing EES to permit the use of the app. Also, we understand it will not be possible to upload fingerprints in advance (required for a person aged 12 and above) due to insufficient technological security standard.

For frequent visitors, EES countries may implement a [national facilitation programme](#) to 'fast-track' these visitors reducing waiting times. For others, the process will differ between 'first time' and 'returning' visitors when collecting biometric data. As a result, for 'returning visitors' fingerprints may not be required to be collected depending on date of last visit and registration date (only a facial image will be required).

6. The EU is not planning to allow registration for EES remotely—e.g. via a dedicated website or mobile phone application—or physically at a location away from London St Pancras, Dover or Folkestone (such as an EU or Member State facility in a major UK city).

a. Is this approach justified?

i. Would remote registration be justifiable for nationals of countries with comparable immigration and security standards to the EU?

We understand a mobile app is being developed by FRONTEX to capture a person's facial image in advance which should help reduce processing time at border control (subject to member state acceptance). While this will not be obligatory and a border official is still required to verify the image captured, efficient remote registration in an attempt to reduce border processing times would be welcome. Extending this option to fingerprints would help even more if/when available. Also, at ports where a traveller is arriving by vehicle, remote registration is justified to mitigate any health and safety concern leaving a vehicle where there is moving traffic.

To incentivise the traveller to register their biometric data in advance, separate border control lanes should be made available (similar to frequent visitors on national facilitation programmes) when staffing/infrastructure allows. There would be little incentive to provide information in advance if you may have to wait behind those that have not.

- 7. Juxtaposed UK/France(Schengen) border controls are in operation at London St Pancras International, Folkestone and Dover.**
 - a. If introduced in its current form, what challenges will EES present UK sites facilitating juxtaposed border controls?**
 - b. Should special dispensation for remote registration or remote pre-registration for EES be provided for at these sites?**

The three UK ports with juxtaposed border controls have limited space for expansion and have/will incur additional costs for infrastructure to manage the forecasted increase in border processing times to collect a traveller's biometric data.

Increased border processing times could also lead to traffic delays arriving at Dover or Folkestone and cause passenger congestion at London St Pancras. Not only will this impact the travellers subject to EES but also travellers such as EU nationals returning to the Schengen Area after visiting the UK. In Kent, the local economy would also be affected by traffic delays and [Operation Brock](#) could become a regular occurrence.

As a result, remote registration for travellers should be provided/permited at these ports. Remote registration need not be far from the port itself and should be as simple as possible.

- 8. In addition to EES, the EU plans to introduce a 'European Travel Information and Authorisation System' (ETIAS) in 2024. The UK's 'Electronic Travel Authorisation' scheme will go live in November 2023.**
 - a. What challenges does the introduction of new EU and UK electronic travel systems present for operators and travellers?**
 - b. Should the UK, EU and international partners prioritise interoperability between their respective systems?**

The impact of ETIAS is not expected to be as challenging as EES, as applying for an ETIAS is advised to be done well in advance of travel. There will also be a transition and grace period for ETIAS, whereby an ETIAS will not be mandatory (during the grace period only for travellers entering for the first time since the ending of the transition period). Furthermore, the ETIAS application form will be in multiple languages and children aged under 18 and adults aged over 70 at time of application will be exempt from paying the application fee.

The UK plans to fully implement the ETA for all applicable travellers before the end of 2024. We understand the target start date for EU nationals (excluding Irish), which could also affect other nationals such as USA, Japan resident in mainland EU, is anticipated to be in autumn/winter 2024. Thus, it is possible the ETA start date for these nationals may coincide with EES as its start date is currently expected in autumn 2024.

Delaying the implementation of ETA or introducing a transition period (similar to ETIAS) would help in case of operational issues with EES implementation. Unrelated to EES, the [British-Irish Parliamentary Assembly](#) has also recommended implementation of ETA "should be suspended until appropriate measures have been introduced to mitigate the negative impact on Ireland and Northern Ireland's tourism industry".

Interoperability between the respective systems (ETA and ETIAS) where a traveller's data is shared with the traveller's consent, would be helpful for travellers who visit more than one country on the same trip (e.g. UK and France) to avoid additional paperwork and confusion between ETA and ETIAS.

When comparing with ETIAS, the ETA application form is only in English, all travellers must pay the £10 fee which is higher than ETIAS and travellers when only transiting airside through the UK must nevertheless have an ETA.

9. What steps should the UK Government be taking to mitigate potential disruption stemming from the introduction of EES for UK ports, operators, and passengers travelling to the Schengen Area?

- Help the European Commission communicate and raise awareness of EES and ETIAS to travellers in the UK e.g. via Foreign Office travel webpages, media channels
- Communicate the operational measures agreed with the French government (further to the [Joint UK-France Leaders' declaration in March 2023](#)).
- Adequate forecasting, resource management and pre-implementation testing to minimise bottlenecks at peak times.
- Contingency planning for traffic delays (welfare provision, traffic management, communication of alternative traffic measures e.g. on gantries on road network).
- Delay the implementation of ETA until after EES is implemented or allow for a transition period.

Our [Visas and Borders webpage](#) with information on EES, ETIAS and ETA is regularly updated and links to official information.

ETOA, 11th January 2024.

January 2024