

## **Airlines UK representation to the European Scrutiny Committee inquiry into the EU Entry/Exit System and its potential consequences for the UK's border**

**12<sup>th</sup> January 2024**

Airlines UK is the association for UK airlines, with members including 2Excel, Ascend Airways, AirTanker, British Airways, DHL, Eastern Airways, easyJet, European Cargo, FedEx, Jet2.com, Loganair, Ryanair, TUI Airways, Titan Airways, UPS, and Virgin Atlantic.

We are pleased to provide evidence to the European Scrutiny Committee inquiry into the EU Entry/Exit System and its potential consequences for the UK's border.

### **Concern with implementation process and timeline**

The European Entry/Exit System ("EES") project involves the electronic recording and storage of data such as the date, time, and location of entry and exit for travellers crossing the borders of EU member states, specifically within the Schengen area. Ultimately, the introduction of the system should be beneficial in the long term, making it quicker to enter the EU.

Airlines are required to update their check-in systems to verify customer data with EES before travel. UK airlines continue to have concerns about the implementation of this new system, both in terms of process and, consequently, timeline. The implementation date has been postponed on three occasions due to the complexity of the programmes involved and the lack of readiness of border authorities across the EU. The EU now expects a 'go-live' date this year, in 'late 2024', and potentially October. It is welcome that the implementation date has been moved to avoid coinciding with the peak, summer season for travel. Nonetheless, there have been ongoing delays to providing environments for airlines to test the system against, and airlines continue to raise concerns with eu-LISA (which is developing the IT system) that the anticipated dates for testing and implementation remain ultimately unclear. Since the last delay and the removal of the eu-LISA test system, airlines have not been able to continue with their system development work. For many they cannot finalise their system changes until access to the eu-LISA test system is made available, and this is hampering their best efforts to meet a 'late 2024' deadline. What is known of the process and requirements appears unnecessarily laborious, resulting in lower confidence that implementation can be delivered on time.

### **Potential Border Impact**

Significant work will have to go into passenger communications ahead of the launch of the new system to ensure customers are ready and know what to expect and are not put off from travelling, and to ensure that any delay impact at EU entry and exit borders is minimised, particularly during initial biometric enrolment of passengers for EES on arrival into the EU for the first time after launch (potentially a three-minute biometric registration process per passenger). This is likely to be most acute in smaller, seasonal airports, where the physical airport infrastructure can be more limited but that can experience spikes in arrivals during certain times of the year. For example, with

EES biographic details such as fingerprints and photos need to be taken at the border on entry to register a passenger, this will need to be managed effectively in circumstances where, for example, three UK flights arrive might arrive at the same time at a smaller airport.

It remains unclear how all countries are going to implement these new arrangements locally – for example some are opting for kiosks, but it seems there currently there is no single approach.

To minimise any potential disruptions arising from the implementation of EES for the operators and passengers travelling to the Schengen Area, the UK government should take a proactive role in creating awareness about the new system. Although operators can assist in promoting the awareness campaign, the DfT, Border Force, and Home Office communication teams should lead the messaging campaign and make efforts to ensure EU departments share relevant communications to other State authorities and customers. Additionally, the UK government should raise awareness about ETIAS, which is scheduled to be implemented six months after the introduction of the EES.

Given the potential impact on UK nationals at the launch of the scheme, it is important that the UK continues to work constructively with its EU counterparts to ensure rollout can be delivered as seamlessly as possible, without undue delays or disruption to passenger journeys at the launch.

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*January 2024*