

European Tourism Association – Written evidence (EBM0019)

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. How much awareness is there of the UK's system and whose responsibility is it to raise awareness? What would be the most effective way to raise awareness?

ETOA has been communicating with its members on a regular basis since ETA was announced in 2021 as part of the [New Plan For Immigration](#)¹. Our members include tour operators based world-wide and (air,sea,land) transport carriers to the UK.

Our [Visas and Border webpage](#) has a section covering [ETA](#)² and includes the official materials published by UK Government (e.g. Webpage to apply, Stakeholder pack, Videos). While our webpage is designed for our members, the webpage is publicly accessible to help raise awareness.

The most effective way in our view to raise awareness would be more official resources (including application form) to be published in other languages, besides English. In comparison, the official [ETIAS website](#)³ is published in 24 languages.

2. How does the ETA differ from the EU scheme (ETIAS)?

ETIAS will apply in 30 countries - all EU member and Schengen states except Ireland. Ireland does not have and (from our current understanding) does not intend to introduce an ETA equivalent, at least in the short term.

	ETA	ETIAS
Cost: ETA is higher and all ages require paying the fee	£10 per person (payable by all ages)	€7 per person (under 18 and over 70 at time of application exempt from paying although still need to apply)
Validity: ETA has less years	2 years, or until expiration of travel document (multiple	3 years, or until expiration of travel document (multiple entries permitted

¹ www.gov.uk/government/publications/new-plan-for-immigration-legal-migration-and-border-control

² www.etoa.org/operating-in-europe/visas-and-borders/#UK-ETA

³ travel-europe.europa.eu/etias_en

	entries permitted during validity)	during validity)
Air-side Transiting: ETA required	Required	Not Required
Application Form language: ETA only in English	1 (English)	24 (all official EU languages)
Biometric data when applying: ETA require facial image in certain cases	Facial image required if age 10+ applying via mobile app	Not required as collected by EES

3. Has the Government addressed concerns about the potential impact of the ETA on the Common Travel Area (CTA)?

British and Irish citizens: ETA does not impact existing travel within the CTA (i.e. free movement)

Other nationals resident in UK: More information is needed (preferably on official ETA webpage) on how other nationals resident in UK can show their UK resident status to transport carriers when travelling from Ireland, Channel Islands, Isle of Man, exempting them from requiring an ETA.

Other nationals (UK visa exempt) resident in Ireland: UK Government has introduced exemption but this only applies when travelling to the UK from within the CTA.

If these nationals were to travel via the UK (including air-side transit) to a country outside the CTA, an ETA would be required on their return journey, which could cause confusion when returning as the national would not have needed an ETA on their outbound journey.

Other nationals (UK visa exempt) visiting Northern Ireland from Ireland: Despite concern from tourism industry ([NITA briefing](#)⁴) and politicians in Northern Ireland, UK Government has not currently granted an exemption to visitors travelling to Northern Ireland from Ireland (who are not resident in Ireland).

The [NI Department for the Economy](#)⁵ is concerned ETA threatens tourism growth and the [British-Irish Parliamentary Assembly](#)⁶ 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".

4. How will the introduction of ETAs affect citizens who still require a visa to enter the UK?

⁴ nitourismalliance.com/reports/

⁵ www.economy-ni.gov.uk/news/electronic-travel-authorisation-scheme-threatens-tourism-growth-murphy

⁶ www.britishirish.org/assets/Committee-A-2023-/231024-COM-A-Protecting-the-CTA-post-Brexit-.pdf

There will be no direct change but the implementation of ETA offers a pathway for visa-requiring nationals to no longer require a visa, as ETA collects pre-arrival information.

5. What are the potential drawbacks of the ETA and what mitigations might be put in place to address these?

- ETA introduces a cost and extra administration (i.e. completing application) for the [top markets to visit the UK](#)⁷ (e.g. EU and USA) that does not exist to date. While some nationals in these markets will be unaffected (e.g. British, Irish, resident in Ireland), the majority will be. Exempting certain categories of person from paying (such as children) would help to mitigate. Also, ETA is more expensive than ETIAS (especially for families).
- The ETA application form is only in English. A person may decide to no longer visit the UK if not confident applying in English. The application form in more languages would help to mitigate.
- The requirement for an ETA for air-side transiting may risk the viability of certain air routes to the UK, as transit passengers choose to fly to other European hub airports. Exempting passengers air-side transiting would help to mitigate and would be the same as ETIAS.
- We are not aware of a formal transition period for ETA, whereas ETIAS will have a formal transition period and an ETIAS will not be required. Furthermore, [UK Government ETA webpage](#)⁸ states that a person can travel to the UK while waiting for a decision on their ETA application. A formal transition period would help prevent potential confusion for carriers boarding passengers.

6. Is the UK prepared for the launch of the EU's Entry/Exit System (EES) and the Electronic Travel Information and Authorisation System (ETIAS)? Are there further steps the Government could take to seek mitigations from the impact of the EES and ETIAS?

We would like to see more communication from UK Government on their preparations for EES and ETIAS, both to industry and public. For instance:

- To industry communicate operational measures agreed with the French government (further to the [Joint UK-France Leaders' declaration in March 2023](#)⁹). The [Tourism Alliance](#)¹⁰ is an umbrella trade association for the UK tourism industry (Outbound, Inbound and Domestic) and would be a good avenue to disseminate this information.
- To public, use Foreign Office travel advice pages to communicate these upcoming changes and direct to the [official website](#)¹¹ for the two schemes.

7. What impact will the schemes have in respect of travel between the UK and the EU? What are the implications for dual nationals of the UK and an EU country?

⁷ www.visitbritain.org/research-insights/inbound-visits-and-spend-quarterly-uk

⁸ www.gov.uk/guidance/apply-for-an-electronic-travel-authorisation-eta

⁹ www.gov.uk/government/publications/uk-france-joint-leaders-declaration/uk-france-joint-leaders-declaration

¹⁰ tourismalliance.com/

¹¹ travel-europe.europa.eu/index_en

There will be no change to travel from UK to Ireland, as Ireland is not implementing EES or ETIAS. From Ireland to UK, travel would change for UK visa-exempt nationals visiting the UK (who are not resident in Ireland) as would require an ETA. Impact would likely be greater travelling from Ireland to Northern Ireland, as a person may be unaware they require an ETA, particularly crossing the land border in a private vehicle.

Travel from UK to Schengen Area (EU25+EFTA) will change in terms of EES and ETIAS being required depending on nationality. British nationals not resident in the Schengen Area (or Ireland pre-2021) will be affected by both schemes. The impact of EES is expected to be greater on travel as collection of biometric data will be collected/verified at the port of entry into Schengen Area, whereas ETIAS is advised to be applied for and received in advance of travel.

Travel from UK to Cyprus is only affected by ETIAS, although if Cyprus' application to join the Schengen Area is approved in the coming months/years, EES will also be implemented.

Travel from Schengen Area (EU25+EFTA) to UK will change in terms of ETA being required for UK-visa exempt nationals. This could further discourage visiting the UK on top of existing passport requirement. We welcome UK Government allowing [children on a French school trip](#)¹² to travel to the UK with their Identity Card and encourage this to be extended to more European countries.

For dual nationals of the UK and an EU country, these nationals are not in scope of EES, ETIAS or ETA. This is on the assumption they travel to/from Schengen Area/Cyprus with their EU passport (where not resident) and when travelling to the UK with their British/Irish passport (where not resident).

25 March 2024

¹² www.gov.uk/guidance/visit-the-uk-as-part-of-a-french-school-trip