

Written evidence submitted by the Airport Operators Association (COR0247)

Summary

- AOA and the aviation industry share the Government's vision and commitment to a smarter and more effective border which encourages prosperity and enhances security.
- The challenges facing the current border operation during this pandemic have been numerous, especially with checks for pre-departure test and Passenger Locator Form (PLF) requirements.
- A better resourced Border Force would help with the passenger queues but also integrated checks at the border within an automated system.
- New technology and the digitisation of border processes, both on the passenger and freight side, will be essential to realising the shared ambitions of Government and industry.
- Slow or delayed modernisation will risk the UK falling behind global competitors.
- In principle, the funding of the border should sit with the Government; should industry be expected to contribute more to this essential function of the state, a broader discussion on the service standards expected from that contribution will need to be had.

Introduction

1. The Airport Operators Association (AOA) is the trade association representing the interests of UK airports, and the principal such body engaging with the UK Government and regulatory authorities on airport matters. The AOA's members include more than 50 airports and 160 Associate Members, made up of companies representing a wide range of suppliers in the aviation industry.
2. Aviation is crucial to the UK economy. A thriving aviation sector boosts economic growth, connectivity and skills and will be key to our future prosperity with the UK now having left the European Union. In 2019, UK airports transported nearly 300 million passengers, including nearly 75% of all visitors to the UK, and facilitated 40% of the UK's non-EU trade by value. Airports are thus critical infrastructure for the UK, across all its regions.
3. The UK Border and its efficient operation is an issue of vital importance to UK airports and so the AOA welcomes the opportunity to respond to the Home Affairs Committee: Supplementary call for evidence: Home Office preparedness for Covid-19 looking at point 6 the management of the border.
4. In addition to securing the nation and forming the frontline of the UK's immigration system, the border is the first point-of-contact for visitors and business travellers; with this in mind it is important that the system is secure but also as welcoming as possible.
 - a. The AOA published a report in 2018 "Towards a Smooth and Improved Border"¹, which includes some suggestions as to how some of the current issues with the UK Border operation in airports might be resolved.

¹ The AOA, 2018, Towards a Smooth and Improved Border, <https://www.aoa.org.uk/wp-content/uploads/2018/07/A-smooth-and-improved-Border.pdf>

5. The border and what happens at the border has never been more central to the public debate than today. We have seen media reports of significant queues in border halls for passengers, despite volumes being at an all-time low, due to the current health requirements for entering the UK making processing passengers more difficult. Given the current COVID-19 health emergency, and the need for social distancing, any prospect of further delays - and thus queues - is clearly unacceptable.
6. As the UK has left the EU and seeks new trade opportunities both with the EU and with countries across the globe, the border will be our calling card. UK airports are committed to working with the Home Office, Border Force, port health authorities and the Department for Transport in improving the experience of the border for traders and passengers alike.

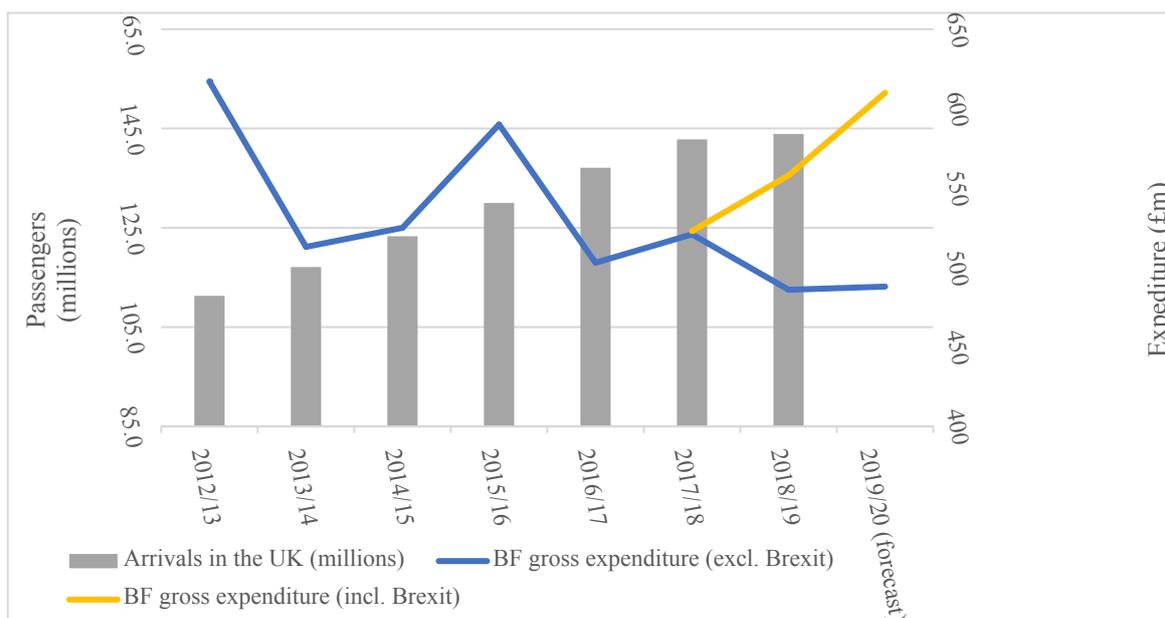
A Supplementary call for evidence: Home Office preparedness for Covid-19.

Covid-19 and the Border

7. The Government's lockdown and severe travel restrictions, which have effectively closed down the UK's airports – and the continued lack of clear pathway out of them – has resulted in very depressed passenger confidence levels. AOA has written many times to Ministers making clear the dire situation facing UK airports, including after the announcement of the latest set of restrictions. We urgently called for clear communications regarding travel rules, for the Government to cover airport's operational losses during this latest period of lockdown and for the introduction of mass rapid testing, removing the need for quarantine. It was reiterated that while the five-day test to release was welcome, it was always the first step towards quarantine-free air travel.
8. Whilst airports understand the public health reasons behind the lockdowns, the situation for airports in the last several weeks has seen another devastating blow for the industry. The closure of travel corridors is again understandable from a public health perspective, but it more or less completes the current shutdown of the UK's airports, which are vital for our post-pandemic prosperity. This continues to make a devastating situation for UK airports and communities relying on the jobs and economic benefits that aviation brings.
9. The Prime Minister's announcement in January that arrivals from over 30 COVID-19 hotspots will have to quarantine in hotels was welcome in that the Prime Minister had listened to industry's concerns and ensured that the new measures only apply to a limited number of countries. However, the previous set of strict travel restrictions were only introduced shortly before the managed quarantine policy was announced, and it remains unclear what additional public health benefit mandatory hotel quarantine would have. It is vital the government now sets when and how we can ease all these measures safely and provide people and businesses reassurance that travel will be possible again in the future.
10. All international arrivals, including UK nationals, have to provide proof of a pre-departure test and a completed Passenger Locator Form (PLF). This will understandably place a burden on Border Force: from the 18 January they have been physically checking each passenger has the correct documentation. This has led to widespread media coverage with images of large queues at airports creating a highly negative image of the desirability of travel to the UK.
11. This process clearly is not going to work when passenger numbers come back in any volume. Even with passenger numbers across the UK at around 2% of 2019 levels, there are passengers queuing for over an hour in some airports. It is important that Border Force are resourced

sufficiently and can deal with the volumes of passengers (even at the relatively low number) to ensure smooth movement of passengers.

12. The Home Office must take responsibility regarding the shambolic nature of the introduction of the PLF, which remains lengthy, overly complex, not available in other languages and cannot be checked on an automated system, such as that used by ePassport gates. In summer 2020 it was announced that it would be simplified, albeit with very minor changes. While some further progress was made in recent weeks, we are still waiting for a PLF that is fit for purpose. The delay to this process when industry has been clearly highlighting how it should be improved is something that the Home Office should have acted upon sooner.
13. This issue also highlights the importance of having technology where assets are used to the best and fullest extent possible, which are both economically and operationally desirable. This does not mean that technology should or must standstill. Continuous improvement of processes and technology can still achieve real improvement at the Border.
14. We also wish to clarify that it is Border Force and the Home Office that are in charge of the immigration halls – not the airports - and it is they who must ensure that it is properly resourced. Airports communicate with their Border Force colleagues on a regular basis and we hope that through this regular dialogue Border Force are able to gauge the resourcing issues that would be needed for a secure and satisfactory service for passengers.
15. Airports have appropriate signage in place to ensure passengers are reminded of social distancing but there are points in the airport journey where social distancing is not possible due to the waiting times and the volume of people in relatively small spaces. This is why face masks are mandatory in airports to reduce the risk of transmission.
16. It is worth highlighting that the issue of queues that stretched sometimes for hours at some of the UK's biggest airports in the summer of 2018, leading to negative comments in the press both here and abroad. Our 2018 report set out some of the reasons for these issues: growing passenger numbers coupled with declining resources for Border Force. This relationship is



highlighted below

17. Despite the growing use of ePassport gates, the decline in staff and wider resource at airports saw queues increasing in UK airports, breaching the waiting times that Border Force work to (known as the Service Level Agreement - SLA). In response, Border Force made a small change in 2017/18, which saw one Border Force officer monitor ten ePassport gates, compared to five previously, to ensure more ePassport gates could be kept open despite lower Border Force staff levels.
18. However, this small change had limited impact on the queues, with passenger growth continuing at record levels pre-pandemic. Particularly during peak seasons, such as the summer holiday period and the arrival of international students in the UK in September, airports across the UK saw queues go well beyond 25 minutes for EEA passengers and 45 minutes for non-EEA passengers, with the EEA queues at London Stansted and non-EEA queues at airports like Heathrow and Manchester grabbing headlines in particular.
19. In 2019, a further change was made to allow citizens of the Border 5 (US, Canada, New Zealand and Australia) and Singapore, South Korea and Japan being able to use ePassport gates. This saw a meaningful improvement in airports with high volumes from those countries, and shows how important the role of technology and innovation, even if this was a minor innovation on existing technology, is.
20. It is important that the Home Office and Border Force do not rest easy on future-proofing the border while passenger numbers are low due to the pandemic. While the pressure may be off for a period, when people do start travelling again in pre-pandemic numbers, the border will again come under pressure. As the AOA outlined in its Airport Recovery Plan, published on 3 February 2021², now is the time to invest significantly in an improved border experience for passengers, focusing in particular on digitisation and implementing seamless journey technology. Other countries, such as the United States, have made great strides in this and the UK risks being left behind.

Policing

21. The collapse in passenger traffic since the start of this pandemic has resulted in revenue decreases of close to 80% in the second and third quarters of 2020, compared to 2019. The reduction in traffic and passengers means that airports have lost their main source of revenue, both aeronautical (airport charges to airlines) as well as non-aeronautical (retail, car parking, etc.). Throughout this period costs have stayed roughly the same: 70-80% of an airports' costs are fixed, including costs for policing, security, rescue and fire-fighting services and air traffic control. Whether one flight departure or a hundred, these remain the same.
22. The Government's announcement of tighter border restrictions that anyone wanting to travel out of the UK will be required to declare their reason for travel, and this will be checked by carriers and with increased police presence at airports and ports. Thus, it is AOA's view that Government must provide assistance with policing costs reflecting its fixed nature despite reduced passenger numbers. Airports pay for the level of policing required and this is a major cost to them, in light of the changed operational reality and depleting revenue streams.
23. While on the cost of policing, appreciating this is likely beyond the scope of this inquiry, the AOA does want to raise the nature of policing at airports and the cost. Police forces in England & Wales have, in general, been very forthcoming in their discussions with airports on the level of

² <https://www.aoa.org.uk/wp-content/uploads/2021/02/AOA-Airport-Recovery-Plan.pdf>

policing required during the pandemic in light of reduced passenger volumes. A risk-based approach has seen a reduction in policing costs to airports. It is important that local police continue to communicate with their local airport(s) so they are able to ensure that this risk-based approach and reduced airport policing cost can continue. However, we are aware of some cases where police have significantly increased costs to airports despite no material change in travel patterns. While the police have their own budgets that need to be met, there must also be an understanding of the predicament that airports and airlines find themselves. Our ideal scenario would be that as part of its support for the airport sector, the UK Government, provides airports with funding for the cost of policing until airport operations can get back to some sort of normality.

February 2021