

European Scrutiny Committee | Call for evidence on EU Entry/Exit and the UK border | HSRG submission

January 2024

About High Speed Rail Group (HSRG)

Representing companies with experience and an interest in high speed rail, High Speed Rail Group is committed to supporting the successful delivery of a world-class high speed rail network in Britain. Our members have helped deliver major infrastructure projects in the UK and around the world, ranging from creating entirely new high speed networks through to maintaining and improving the UK's existing rail network. This gives us a unique insight into both the shortcomings in the current network, and the transformative capacity and connectivity benefits that high speed rail can bring.

Our unique set of expertise in engineering, operations, funding and regulation gives us the experience to ensure the extension of the high speed rail network leaves a lasting legacy for the UK. The company's principal objective is: "to support, promote and champion the development of high speed rail in Great Britain".

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?

The implementation of EES poses several challenges, and ensuring seamless interoperability and preventing disruptions at border crossings must be of paramount importance. The High Speed Rail Group (HSRG) is concerned that at present there is no plan in place to mitigate disruption. Adapting to these proposed changes and managing the transition period while minimising inconvenience to passengers and operators presents significant hurdles which must be negotiated.

HSRG is extremely concerned at the impact assessment for the rollout of this technology at St Pancras, which indicates alarming potential consequences if proactive measures to mitigate disruption are not taken by the Government. Failure from the UK Government to exert influence over member states swiftly could lead to a projected increase in peak-time queue lengths. The duration of peak times is certain to extend significantly due to bottleneck formations and insufficient capacity, particularly within the context of a network still adapting to increased passenger demand and a shift toward leisure travel post-pandemic.

This disruption not only jeopardises passenger experiences but also poses a threat to overall performance. A spike in severely disrupted journeys will not only impact operators in a financial sense, but scenes of travel chaos at St Pancras are likely to attract national news coverage, and will paint a poor view of international rail travel. We believe that an overnight introduction of EES technology, and the inevitable delay which will ensue, will affect rail at St Pancras much more visibly than ferry transport from Dover or airport travel. Unlike ferry and airport passengers, international rail passengers will experience significant delay and inconvenience on the UK side of the journey.

As such, HSRG's belief is that the introduction of this EES technology, and the delays which will result, will negatively impact UK efforts to achieve modal shift away from cars and flights, toward rail. HSRG appreciates that the eventual implementation of this new system is inevitable, but further consideration and collaboration between UK Government and EU member states is essential to avoid delay and disappointment.

In HSRG's view, modal shift towards rail is crucial if the transport sector is to collectively decarbonise. Beneficial modal shift will only happen if: (1) there is an attractive alternative to road (and short-haul air) travel; and (2) there is capacity to accommodate modal shift on a significant scale. This is a delicate balance: in the UK, evidence shows that the tipping point for modal shift from air to rail lies in the 2.5 hour – 4.5 hour range. For example, research shows that taking an hour off rail journey times on

Edinburgh/Glasgow–London and Edinburgh/Glasgow–Midlands routes would result in rail market shares growing from today's 30% share of the market, to 75%.¹

The kind of delays to international rail travel of the magnitude that are possible this Autumn due to EES rollout, could dissuade many would-be rail users from travelling by train more frequently for longer journeys. If customers are forced to wait for several hours in St Pancras for Eurostar services as has been forecast, the kind of modal shift toward rail that our industry is trying to achieve could be severely undermined.

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). Is this approach justified?

The High Speed Rail Group (HSRG) has concerns regarding the impending introduction of the new EU Entry/Exit system (EES) across juxtaposed border controls. We call on this Committee to encourage Government to take action to prevent significant adverse effects.

We join HS1 Ltd., a member of HSRG, in expressing concerns about the operational rollout of the EES this Autumn. Despite substantial preparatory efforts undertaken by various organisations such as HS1, Eurostar, Getlink, and the Port of Dover, there remain considerable uncertainties. Chief among these uncertainties is the establishment of new border control infrastructure at train and ferry terminals on UK soil, which in our view will lead to significant delays for passengers, cancellation of services, and potential for financial and reputational harm to the UK rail industry.

8. (2) Should the UK, EU and international partners prioritise interoperability between their respective systems?

Interoperability between the UK's Electronic Travel Authorisation scheme and the EU's EES is crucial for streamlined travel operations and ensuring a smooth experience for passengers. Given that rail passenger levels have increased since COVID-19 across the board largely as a result of increased reliance on leisure travel, as opposed to commuting, the significance of maintaining seamless interoperability between the UK, the EU and other international systems cannot be overstated.

Collaborative efforts to establish compatibility between systems is crucial if we are to facilitate efficient data exchange, reduce redundancies, and enhance border security without unduly burdening passengers or operators.

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?

Considering the critical implications of EES implementation on cross-border travel and operations, urgent action is imperative to mitigate the anticipated disruptions. HSRG urges the Government to collaborate closely with pertinent authorities both in the UK and in the EU to ensure a smooth transition, while minimising adverse impacts on both operators and passengers. HSRG joins HS1 Ltd in calling for:

¹ January 2022, High Speed Rail Group research, *Modal shift matters –and HS2 delivers it* <https://www.rail-leaders.com/wp-content/uploads/Modal-shift-matters-landscape-version.pdf>

- a. greater clarity on timelines around the implementation of the technology;
- b. a period of progressive implementation of the technology, to ensure problems are ironed out gradually, should be considered. Greater clarity should be provided on how that could be arranged;
- c. consideration of a “break mechanism”, so that if a maximum level of delay is exceeded then we can quickly revert to the standard passport system;
- d. flexibility in implementation from the Government in the coming months to avert chaos at UK borders
- e. assurance that the UK Government will proactively collaborate with EU member states wherever possible to manage delay and mitigate harm to the UK rail industry.