

Briefing: Borders and Nationalities Bill - Electronic Travel Authorisation (ETA) and the implications for Tourism

Introduction

NITA welcome the opportunity to provide evidence to the NI Affairs Committee in regard of the impact of the introduction of the ETA, included in the Borders and Nationalities Bill on tourism in Northern Ireland.

The NI Tourism Alliance, established in 2018 and led by industry, is the voice for tourism and travel in Northern Ireland with members spanning all sectors of the tourism economy. An overview of our work and our members is included at the end of this document.

Tourism - A Key Economic Driver

Prior to the covid-19 pandemic, tourism has been one of the most resilient and successful parts of the local economy surpassing returns on investment made in other industrial sectors and out-pacing the average in job creation. 2019 was a record breaking year for Tourism which generated over £1bn in direct visitor spend and supported over 72,000 jobs.



Growth of 31% since 2013



In 2019, the number of external visitors to NI increased by 7%, compared to the RoI (+2%) & GB (+2%)



200% growth in cruise ships docking in Northern Ireland from 2013 - 2019



Visitor spend contributes in excess of £1bn to the economy



Visitor spend grown 46% from 2014 to 2019



70% total visitor spend was by visitors from outside NI



22% growth since 2013 and 35% growth in median pay

Impact of Pandemic on Tourism

Tourism businesses have been at the forefront of the catastrophic economic impact of Covid-19. In effect, the tourism industry lost 12 months of trading during the 24 months of the pandemic. It is estimated that the industry and therefore the economy will have lost over £1bn in visitor spend during that period.

Tourism businesses have shown resilience, innovation and agility to come through the pandemic and there is an ambition to build back stronger, however with unprecedented levels of debt, significantly reduced reserves and increasing costs the industry has its challenges to overcome in order to recover and grow.



Borders and Nationalities Bill - Electronic Travel Authorisation (ETA) and the implications for Tourism

The UK Government are in the process of passing the '[Nationalities and Borders Bill](#)'.

The bill is now at the consideration of amendments stage and the House of Commons is considering the amendments made by the House of Lords. Part of this legislation proposes visa requirement for non-British and Irish nationals to cross the border in Ireland something which the Northern Ireland Tourism Alliance (NITA) and other tourism bodies across the island of Ireland believe will be hugely detrimental to tourism on the island.

Northern Ireland is promoted internationally by Tourism Ireland, as part of the Island of Ireland destination, and the majority of overseas visitors to Northern Ireland arrive via Dublin.

Typically, non-GB overseas tourists who travel to Northern Ireland (those that spend at least one night in Northern Ireland):

- 60% spend nights in both Northern Ireland and Ireland
- 13% spend nights only in Northern Ireland but access via a port in Ireland

Bill summary

The bill is primarily an asylum and immigration bill, however the new legislation extends to short visits into the UK, so tourists will have to comply.

As it stands all non-visa nationals (NVNs) visitors into the UK, who do not hold British or Irish citizenship, will have to apply for an ETA. It is planned that this be fully operational by the start of 2025. There will be a charge attached to this, and once issued, the ETA will entitle the holder to one visit into the UK. Further details as to the exact cost and means of application/issuing are, as yet, unclear. How an approved ETA would be validated for single entry on the Irish border is also unclear.

Industry concerns

The tourism industry in Northern Ireland and across the island have not been consulted at any stage in this process despite being key stakeholders. Introducing an ETA requirement to cross the border in Ireland is of huge significance to our industry, yet in spite of this we see none of our concerns taken on board thus far. This briefing details some of the many ways in which this proposal impacts the tourism industry and the reasons we consider it to be unworkable. We welcome a revision of the proposed legislation and ongoing engagement with key voices in our industry.

Our concerns are echoed by Tourism Northern Ireland and Tourism Ireland and the Irish government has also been outspoken in its desire to see proposals for an ETA requirement on the island of Ireland quashed.

Various industry partners have studied and costed the potential impact of this proposal and their findings are extremely concerning for an industry already on its knees after the pandemic.

This briefing outlines a summary of these findings

Difficulty to implement

Northern Ireland is unique in that it is the only part of the UK that shares a land border with another state. There are over 300 crossing points on this border. It seamlessly sits on fields, villages, streets and bridges. A requirement to have an ETA for every single crossing could run into hundreds of pounds per day for tourists or non-British or Irish residents of Republic of Ireland (RoI) on the border. It would be impossible (and undesirable) to validate every crossing making the proposed legislation totally unworkable.

Independent travellers frequently cross the border multiple times whether travelling by rental car or bus. It would be common to go through the north via Derry/Londonderry to

Donegal and back via Belfast to Dublin. A relatively standard itinerary such as this would require multiple single-entry ETAs and would be a significant extra expense as well as an administrative and psychological deterrent to tourism.

There are many non-Irish EU nationals employed in the tourism sector in the RoI including, but not limited to coach drivers. They are employed and legally resident in RoI, yet their job requires crossing the border, sometimes multiple times per day. Under the proposed scheme they would require a separate ETA for every entry. In addition to these there are the tours which travel to Ireland from mainland Europe, for whom this will be equally unworkable. In an area already experiencing a skills shortage this could prove devastating.

Tourism Ireland research has continually confirmed that hassle and expense are key deterrents for travellers when choosing their holiday destination, therefore consumer perception on ease of travel is paramount. In addition to the bureaucracy and cost we must also consider the threat of prosecution of noncompliance as a significant deterrent. If implemented in its current form this will be expensive and unclear and tourists may likely decide not to bother with the northern part of any itinerary. Furthermore, with fuel costs, inflation and now ETA, the risk is that many global tour operators will exclude Belfast and NI from their itineraries as no longer a feasible option.

The experience of differing regulations and requirements under covid was an example of an administrative, financial and psychological border to free travel and the industry suffered from mass cancellations from tour operators.

Another factor to be considered is the communication element. Entry requirements for any country are generally given when travel is booked into the port of entry. Travellers arriving in to the RoI will not be given this information and so many, especially independent travellers, may be unaware of the requirements and find themselves inadvertently having broken the law. Obviously, this is something we must try and avoid.

Financial implications

NITA and industry partners have costed the implication of the ETA some of those findings are outlined below. Should further information be required this can be provided.

- On an industry-wide level we estimate that the introduction and associated costs of the ETA for NVNs could impact over half a million visitors and put £160.6m visitor spend at risk (based on 2019 NISRA figures).
- In addition, 9% of residents in the RoI are not Irish citizens but are legally resident due to EU membership. Under this proposal they will require an ETA every time they cross the border. Based on 2019 visitor numbers (NISRA) this could impact up to 68,000 visitors from RoI putting around **£13M at risk** from this alone. This is a conservative estimate as there was a significant (estimated ~50%) increase in these numbers during the pandemic
- Visit Belfast handled 867,300 visitor enquiries through its Visitor Information Centres in 2019/20. 48% (416,000) of those enquiries were from outside the

common travel area with many coming into the city via Dublin due to international air access - or as part of an all-island trip.

- For the City of Derry, due to its proximity to the border, more than 30% of its visitors are from outside the CTA, well above the national average for NI. Derry/Londonderry, which is a former (and the first ever) UK City of Culture, could see the years of hard work and innovation which went into establishing it as a go-to place in the field of tourism put at risk due to uncertainty and bureaucracy resulting from the ETA and its unworkability.
- Research from one of NI's key attractions forecasts that an estimated 25% of visitors from outside the Common Travel Area would not travel to Northern Ireland should ETA be a requirement. The combination of the forecasted **drop of both Irish-resident and international visitors totals 15%**, bringing numbers down from 800,000 to 681,920 visitors. This is enormous.
- Based on the economic impact of this aforementioned key attraction contributing £430m in additional spend in its first 10 years, this potential 15% drop in visitors would mean a **loss of approx £10million** in additional spend to the NI economy in financial year 2024/25
- Custodian of other key attractions have also put forward their concerns, noting that, in 2019 of the 998,000 visitors to one of their main sites, 78% were out of state, with significant number entering NI from RoI. It has also been noted that attractions close to the border may feel an even greater impact that that foreseen by the industry in general. Another factor giving them cause for concern is the impact this would have on volunteers, on which many attractions depend, and for whom Northern Ireland in general, and especially areas close to the border, may become a less attractive destination.
- Business tourism is a growing sector and Visit Belfast has advised that on average (5 years pre-pandemic), 35% of all inbound conferences secured for Belfast have been European and international events providing crucial midweek and year-round business for the tourism industry in Northern Ireland. The vast majority of these delegates enter via Dublin due to limited direct flight access into Belfast from international business source markets.
- ETA will significantly impact our ability to compete for international business tourism at a time when Northern Ireland has just launched an [ambitious 10 year strategy for growth in business tourism to the region](#). The sales cycle for international conferences can be 3-5 years in advance so despite the legislation not coming into effect by 2025, it will impact sales prospects now and is a huge risk for international business bids.

Precedent

The Home Office currently have an exemption to existing immigration policy for visitors to NI. EU visitors are no longer able to travel to the UK on an EU ID card however, the Home Office have made an exemption permitting visitors holding only an EU ID card to cross the land border from RoI to NI. This means that the legal entry requirements for entry into the UK are different for ports and for the land border with RoI. This is a sensible and enforceable policy which the tourism industry would like to see replicated in this case.

Proposed action

In line with other exemptions which reflect specific geographic nature of the island of Ireland and the fact that Northern Ireland is promoted internationally as part of the Island of Ireland destination we would like to see an ETA exemption for all those travelling by land to Northern Ireland via the Republic of Ireland for the purposes of tourism/ business/ work/ medical treatment.

About NITA

NITA's role, as the single representative body for the tourism and travel industry in Northern Ireland, is to represent our members and ensure the voice of industry is listened to, to shape the future growth of tourism and lobbying at all levels of government and beyond to raise awareness of and contributing to the solution of major strategic issues affecting the industry, which include everything from the Covid-19 pandemic, the UK's exit from the European Union, the impact of APD, VAT, access to talent and skills development and the ongoing uncertainty of the economic climate to the industry's overall competitiveness and growth.

We work closely with the Department for the Economy, Tourism NI and Tourism Ireland and provide a conduit to the breadth of sectors that make up the Tourism & Travel economy. More recently we have been engaging with Department of Health and The Executive Office regarding Covid-19 regulations, guidance and reopening. NITA were part of the Tourism Recovery Steering Group established by Minister Dodds in response to the decimating impact of Covid-19 to the tourism & travel industry.

In the UK, we are part of the Tourism Industry Emergency Response Group and the Tourism Industry Council ensuring that the challenges we face are understood and considered in policy developed and delivered through UK Government departments.

Members:

Titanic Belfast

Visit Belfast

National Trust

Belfast City Airport

Aer Lingus

British Airways

City of Derry Airport

Visit Derry

Belfast Harbour

Fermanagh Lakelands

Tour Guides NI

NI Tour Guides Association

Hinch Distillery

Titanic Distillers

Visit West Belfast

NI Hotels Federation

Hillsborough Castle

National Museums Northern Ireland

ABTA

Bus and Coach NI

ICC Belfast

Associate Members

Belfast Metropolitan College

Queens University Belfast

Translink

Belfast City Council

Derry and Strabane District Council

Ards and North Down Borough Council

Newry and Mourne District Council

Fermanagh and Omagh District Council

Antrim and Newtownabbey Borough Council

Mid and East Antrim Borough Council

Causeway Coast and Glens Borough Council

Lisburn and Castlereagh City Council

Armagh City, Banbridge and Craigavon Borough Council

Strategic Partners

Tourism NI

Tourism Ireland