

Appendix 1

Written Evidence submitted by Northern Ireland Tourism Alliance, Tourism Northern Ireland and Tourism Ireland to the NI Affairs Committee related to the introduction of the ETA included in the Borders and Nationalities Bill

Written evidence submitted by Northern Ireland Tourism Alliance, related to Tourism and the Common Travel Area non-inquiry Committee business (TCT0002)

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.



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 than 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

Written evidence submitted by Tourism NI, related to Tourism and the Common Travel Area non-inquiry Committee business (TCT0001)

Potential Impact of the Nationality and Borders Bill on Tourism in Northern Ireland

The realisation of the proposed Nationality and Borders Bill has the potential to be damaging to the tourism industry in Northern Ireland. While there may be no routine checks planned on the border between Ireland and Northern Ireland, if this becomes a legal requirement, Tourism NI and Tourism Ireland, who are responsible for the marketing of the Island of Ireland overseas, will have to share that information with prospective visitors, including on our websites Discovernorthernireland.com and Ireland.com. We will also need to advise all overseas tour operators and their agents who feature Northern Ireland in their tour programmes.

Tourism is a vital industry for the Northern Ireland economy. Prior to COVID-19, 2019 was the best year ever for tourism to Northern Ireland, when we welcomed 2.245 million overseas visitors, who spent £589 million during their time here, supporting 70,800 jobs. Since 2010, there has been a +57% growth in overseas tourists to Northern Ireland. This includes growth from the following impacted markets:

- North America +90%
- Mainland Europe +49%
- Other Areas +108%

Also since 2010, we have seen growth of +85% in overseas tourist revenue as follows:

- North America +92%
- Mainland Europe +32%
- Other Areas +85%

The growth in this business has been hard won. We have had to overcome decades of negative international publicity about Northern Ireland and convince tour operators and agents who have been successfully selling traditional itineraries of the Republic of Ireland to include Northern Ireland within their programmes. The requirement for potential visitors to complete an ETA along with the added cost, irrespective of how quick and inexpensive that might be, will be a deterrent and will discourage people from travelling north of the border as part of their trip to the island of Ireland.

The majority of overseas visitors to Northern Ireland arrive on the island of Ireland via Dublin. Typically, amongst 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

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. For example, Tourism Ireland and Tourism Northern Ireland's experiences on communicating the different Covid-19 entry requirements for the Republic of Ireland and Northern Ireland to tour operators, demonstrated that any additional administration resulted in cancellations and lost business.

The impact of introducing an ETA is not limited to potential impact on visitors from overseas, According to the Republic of Ireland's latest published Census of Population (2016), of the 4.76 million population, 535,475 were non-Irish nationals from 200 nations. Of these, 103,113 were from the UK leaving 432,362, representing 9% of the Irish population. This therefore reflects a significant proportion of the resident Irish population who could be directly impacted by the Bill if wishing or requiring to travel to Northern Ireland depending on their visa, work permit status etc.

Attracting visitors from the Republic of Ireland to Northern Ireland has not been without its challenges. In 2016 research undertaken by Tourism NI concluded that of all the short breaks taken by ROI residents on the island of Ireland, less than 3% were taken in Northern Ireland.

Over the course of the past 5 years that has risen to almost 9%, in part due to the ease of access to Northern Ireland during the pandemic period. Research undertaken in 2021 has shown that over 50% of those visiting NI from the Republic had done so for the very first time. Tourism NI believe that there is potential to grow this market further but requiring 9% of the population to be in possession of an ETA will act as a deterrent to that growth.

Written evidence submitted by Tourism Ireland, related to Tourism and the Common Travel Area non-inquiry Committee business (TCT0003)

Opening Statement by Tourism Ireland's Director of Corporate Services, Policy and Northern Ireland to the Northern Ireland Affairs Committee.

Introduction and background

Tourism Ireland is the organisation responsible for marketing the island of Ireland overseas as a leading holiday destination. Our principal objectives are to increase tourism to the island of Ireland and to support Northern Ireland to realise its tourism potential. We operate in over 21 markets around the world and roll out world-class global marketing campaigns for Northern Ireland and the island of Ireland. We work closely with Tourism Northern Ireland to ensure that our promotional themes align with their development priorities for the industry. This is a very integrated and collaborative approach.

Importance of tourism to Northern Ireland

Tourism is a vital industry for Northern Ireland as it is a significant driver of economic growth. Prior to COVID-19, 2019 was the best year ever for tourism to Northern Ireland, when we welcomed 2.245 million overseas visitors, who spent £589 million during their time here, supporting around 71,000 jobs.

Since Tourism Ireland came into operation in 2002, almost 32 million overseas tourists have come to Northern Ireland, whose visits have generated more than £7.2 billion generated for the Northern Ireland economy. Visitors from non-GB markets accounted for 9.5 million, or 30%, of those tourists and £2.7 billion in revenue.

Impact of COVID-19 on tourism

COVID-19 has had a significant impact on global travel and has presented a completely unprecedented and extremely serious situation for our industry. Every destination across the globe has experienced the impact of COVID-19 and now, as we emerge from the pandemic, is seeking its share of the recovery. The competition in the international marketplace to attract tourists is more challenging than ever. Keeping Northern Ireland front and centre in consumers' minds, and making it as easy as possible for them to choose Northern Ireland, is therefore critical.

Nationality and Borders Bill

As Tourism Ireland is responsible for promoting the island of Ireland – including Northern Ireland – overseas, we feel it is important that we voice our concerns about the impact this bill could have on overseas tourism to Northern Ireland.

Although British and Irish citizens (in line with Common Travel Area principles), and non-British and non-Irish citizens who already have a visa for the UK or other kinds of immigration permission, will not need an ETA (Electronic Travel Authorisation), we believe the realisation of this bill has the potential to be very damaging. Everyone outside the aforementioned categories will need to apply for an ETA before travelling to the UK, including for 'local

journeys' from within the CTA. For example, a Polish coach driver living in Co Louth who drives coach tour groups from Dublin to Belfast would require an ETA to cross the border, in order to comply with the law. A French person working in a hotel in Derry-Londonderry, but living in Co Donegal, would require an ETA to go to work.

Under the proposed rules, any non-Irish / non-British citizen who is encountered by the authorities in Northern Ireland without an ETA or other permission to be in the UK would be committing a criminal offence and would be subject to immigration enforcement.

While there may be no routine checks on the border between Ireland and Northern Ireland, if this becomes a legal requirement, Tourism Ireland will have to share that information with prospective visitors, including on our international website, Ireland.com. We will also need to advise all overseas tour operators who feature Northern Ireland in their tour programmes.

The majority of overseas visitors to Northern Ireland arrive on the island of Ireland via Dublin. In 2019, most (62%) non-GB tourists came through the Republic of Ireland and their visits delivered £109 million to the Northern Ireland economy (or half of the non-GB revenue). Two-thirds, or 68%, of Northern Ireland holidaymakers from markets other than Great Britain use the Republic of Ireland as their point of entry (77% from North America, 68% from Mainland Europe and 54% from other areas). In fact, Dublin Airport provides an alternative gateway to Northern Ireland, due to its proximity, share of Northern Ireland resident traffic and its route network, with direct flights from 180 locations.

Typically, the further a tourist travels to get to a destination, the longer they stay and the more they spend. GB visitors to Northern Ireland have a shorter average stay (3.9 nights) and lower average spend (£253) than other tourists (5.4 nights and £281).

Having to apply online for pre-travel clearance in order to cross the border would add an unnecessary layer of bureaucracy and complexity. Tourism Ireland research has continually confirmed that hassle and expense are key deterrents for travellers when choosing their holiday destination. For example, over the past two years, Tourism Ireland and Tourism Northern Ireland's experiences in communicating the different COVID-19 entry requirements for the Republic of Ireland and Northern Ireland to tour operators demonstrated that any additional administration resulted in cancellations and lost business.

MCCP research

Earlier this month, Tourism Ireland commissioned research to assess the awareness and perceived tourism impact of the proposed bill. The research was conducted by MCCP and involved interviews with both tourism industry professionals and overseas tour operators.

The research showed that, although the cost of the implementation of the proposed bill is not yet known, the tour operators and industry foresee an immediate drop in visits to Northern Ireland, as it will bring increased cost and administrative burdens which will be passed on to the traveller.

Northern Ireland, unlike other parts of the UK, relies more on non-domestic visitors and on visitors coming via Dublin as the main gateway. Northern Ireland is an important part of an itinerary but is not a stand-alone destination for many.

Industry and tour operators interviewed for this research made it clear that adding this barrier to a currently seamless offer is likely to strike Northern Ireland off itineraries. The 'unity' of the Tourism Ireland brand and island of Ireland proposition will be fractured after so much investment and many successful years.

The proposed bill has the potential to damage our reputation. Among those interviewed, it is seen as a step backwards, at a time when tourism needs support and forward momentum. Northern Ireland will become more isolated and become a harder sell, as an ETA is seen as a border check. Tour operators will want to adhere to the law, even if it will not be border controlled, and it is feared that any news of potential arrests will present perceptions that it is unsafe and not easy to travel to Northern Ireland.

In addition, the bill is seen by the industry as an additional bureaucratic burden that does not give due consideration to the economic impact on Northern Ireland.

Conclusion

The realisation of the proposed Nationality and Borders Bill has the potential to be extremely damaging for overseas tourism to Northern Ireland. Our research highlights that there are significant concerns amongst industry and tour operators and certainty is urgently needed.

Since it came into operation, Tourism Ireland has invested over £1 billion in marketing the island of Ireland, including Northern Ireland, overseas. This investment – from the Irish Government and the Northern Ireland Assembly – has been made on the basis of unrestricted access across the island. If this bill is passed, the island of Ireland proposition will be fractured after so much investment and many successful years.

If the bill is passed, clear communication, clarity on its implementation and a simple application process will be required.

I ask members of this committee to consider the risks associated with this bill and look at mitigation options. It is vital for the future of the Northern Ireland tourism sector that all efforts are made to keep travel from overseas as hassle-free as possible.

THE POTENTIAL TOURISM IMPACT OF THE PROPOSED UK NATIONALITIES AND BORDERS BILL (Presentation for Tourism Ireland by MCCP, the Independent Strategy Agency)

1. BACKGROUND AND OBJECTIVES

RESEARCH OBJECTIVE

Assess the awareness and perceived tourism impact of the proposed UK Nationality and Borders Bill which includes the requirement for an Electronic Travel Authorisation (ETA) to enter the UK and Northern Ireland.

Who we spoke to

- 12 x in-depth interviews (15-20 minutes)
- Across both industry and tour operators
- Locations in Europe and North America
- Conducted w/c 4thApril –12thApril 2022
- Moderators: Kay McCarthy and Richard O'Donnell

Number	Profile	Location
1	Industry professional	Ireland
2	Industry professional	Ireland
3	Industry professional	Northern Ireland
4	Industry professional	Northern Ireland
5	Tour operator	France
6	Tour operator	France
7	Tour operator	USA
8	Tour operator	Canada
9	Tour operator	USA
10	Tour operator	USA
11	Tour operator	Germany
12	Tour operator	Global

2. AWARENESS AND UNDERSTANDING

LOW AWARENESS, CONTEXT IS AN INDUSTRY IN SEVERE RECOVERY MODE

- **Now focussed and in recovery mode:** The tourism sector is in the midst of recovery in the wake of Brexit and Covid-19 disruptions, so not looking as far out as 2024, even though this will impact some travellers and operators very shortly. Some feel it is a bit under the radar.
- **Good news is required, not confusion or uncertainty:** An optimistic pressure now exists for success in 2023 and forecasting through to 2024/25 –but all *without* considering this Nationality and Borders Bill.
- The absence of detail on how it will work, how it will be managed, and associated costs is **adding more uncertainty** at a time where recovery and good news are needed.
- Industry experts appear more informed than tour operators of the Bill's existence and there is consensus between both groups that the **traveller is not at all aware of this change**.
- Several operators did not know much about it, apart from some communication from Tourism Ireland.

“Tourism is so busy – planning ahead is key and this issue could be in danger of slipping through” (Industry)

“We need good news and clarity, more uncertainty is fuelling concern and this will impact on decisions today that are being made for 2024” (Industry)

THE BILL IS VIEWED AS A DEVASTATING MOVE FOR TOURISM ON A NUMBER OF LEVELS

- The economic impact: Even though the cost and implementation plan is not known, tour operators and industry foresee an immediate drop in visits to Northern Ireland, as this regulation will bring increased cost and administrative burdens which will be passed on to the traveller.
- Northern Ireland, unlike other parts of the UK, relies more on non-domestic visitors and on visitors coming into Ireland via the Dublin as the main gateway.
- Northern Ireland is an important part of an exciting itinerary but is not a stand-alone destination from many.
- Adding complexity: Adding in a barrier to a seamless offer is likely to strike Northern Ireland off an itinerary as it is often a one or two-day trip for many. For some (e.g. long-haul travellers who include Ireland as part of a European trip), the island of Ireland could be struck off, as it will increase the cost and hassle of the trip and make it less competitive versus other European destinations.

*“Exceptionally detrimental, this is a shame, we’re only growing back business post-Covid ”
(Tour operator)*

“Island of Ireland has a great proposition – now people may have to forgo the North, this will have an impact on visitor numbers and the overall proposition will also suffer” (Industry)

TOURISM IRELAND’S BRAND AND REPUTATION WILL BE UNDERMINED

- ETA/Bill creates a marked difference between visitor requirements from one tourism market and another. Ireland being sold as an inclusive, single destination will be compromised.
- Tourism Ireland’s work along with Tourism Northern Ireland has been successful in the promotion and development of iconic attractions. It is felt that this work (investment) will be undermined by the introduction of the border bill, as it will put a barrier in place for both travellers and operators. It is seen as a step backwards at a time when the tourism industry needs support and forward momentum.
- Ease of travel is a key benefit for operators to promote and to travellers who want to get more options for their stay. This will no longer be the case.
- Tour operators will want to adhere to the law, even if it will not be border controlled, and it is feared that any news of potential arrests will present perceptions that it is unsafe and not easy to travel to Northern Ireland.

“We have been successful in promoting the Island of Ireland as one beautiful place with many different attractions, this will put a barrier for the traveller, they want the opportunity to visit all of it” (Tour operator)

DIVERGENCE OF REGULATIONS WILL BE DIVISIVE BETWEEN TOURISM MARKETS, IMPEDING EASE OF CROSS SELL

REPUBLIC OF IRELAND - may be more insulated from the Bill impact:

- Main focus destination –larger offering, longer stays
- Tourists often holiday close to where they arrive
- EU travel freedoms
- Currency convenience
- Longer tourism history –but less of a diversified offering without Northern Ireland

NORTHERN IRELAND - Northern Ireland will become a more difficult sell:

- Minor/short stay destination easy to ignore by travellers
- Tour operators may reduce promotion of NI
- Electronic border = unwelcome psychological barrier
- Resurgence of unpleasant Troubles' memories and safety issues
- Currency difference
- Unravelling of all island co-operation benefits

BILL IS SEEN AS A BUREAUCRATICAL BURDEN WITHOUT DUE CONSIDERATION OF ITS ECONOMIC IMPACT ON NI

- Tour operators distinguish between the appeal of visiting a country and the administration negatives that authorities may impose
- Ireland-Northern Ireland destination is unique and operational ease is important to successful collaboration and the tourism experience
- Some European operators still maintain frustration towards Brexit and see this Bill as a further political hindrance for the sector
- If the ETA requirement does not equate to a request (an actual border check), it becomes a pointless (and costly) obligation
- Tour operators fear the UK is attempting to enforce illogical tourism procedures in Ireland disguised as migration/asylum control plans

“The UK just wants money from everywhere, money grabbing, which it must do when it has isolated itself from Europe” (Tour operator)

“Bad thing, Brexit has not been a good point, French have got attitude to travel to places that are safe and easy... this ETA is not a good way” (Tour operator)

3. THOSE THAT WILL BE IMPACTED MOST

PERCEIVED IMPACT ON JOURNEY TYPE

- EUROPEAN: Potential for significant impact
- SPONTANEOUS: Potential for significant impact
- LONG HAUL: Potential for moderate impact

EUROPEAN VISITORS ARE BETTER POSITIONED TO CHOOSE ELSEWHERE

- Tour operators view the European tourist market as very competitive for Ireland
- As there are currently no 'close' European destinations with such a proposed ETA process, any additional administration provides an easy reason to choose an alternative 'sunnier place to visit' instead
- In addition, proportionately, Europeans will find it difficult to justify an ETA fee on top of a cheap flight for a short break
- Bitterness still exists for some Europeans towards Brexit and the UK authorities' approaches to doing business and travel; another barrier is not a helpful move

"While cost of this ETA is as yet unknown, it would be difficult to proportionately justify such a cost against an inexpensive flight for a weekend to Belfast" (Tour operator)

SOCIAL, SPONTANEOUS AND SHORT- TERM TRAVEL WILL BE PROHIBITIVE

- Spontaneity of travel from the Republic to Northern Ireland will be immediately affected
- The notable 9% of Irish residents, but non-citizens, that want to travel to Northern Ireland will be affected
- last minute weekends away to Northern Ireland or concerts for non-Irish/non-UK passport holders are expected to be too complex under ETA, to make it worth it
- Tour operators will be prohibited from taking spontaneous advantages for their customers, on events, special offers north of the border

"For tourists that want to travel on a whim to Northern Ireland, it will have a massive impact on this." (Industry)

ETA COULD BE MORE MANAGEABLE WITH LONG-HAUL TRAVEL

Tour operators in locations such as North America are somewhat more accepting of this proposed policy, once it is within reason in terms of cost, online process etc.

- Long-haul destinations are part of a more involved travel booking process including other 'paperwork' elements, all of which are usually planned well in advance
- This new authorisation completion could become just a small part of the bigger process

- However the irrational requirement for an ETA vs 'no request' at the destination (no actual border checkpoint), is expected to drive complaints over the actual logic of the system and may deter travel in the end

“For long haul travel, tourists are used to filling out a lot of forms so this will probably end up being just another thing to do” (Tour operator)

PERCEIVED NEGATIVE IMPACT ON TRAVELLER TYPE

- FAMILIES: Unjustified (multiple) expense and effort
- OLDER TRAVELLERS: Anxiety and unnecessary hassle
- BUSINESS TRAVEL: Uncertainty and doubt
- OPERATORS: Complexity, increase costs and admin

FAMILIES WILL BE EXPOSED TO UNJUSTIFIED EXPENSE AND EFFORT

- Identification cards' option for EEA citizens for cross-border travel is a clear advantage for practical and cost-conscious families
- Whether from Europe or elsewhere, any additional cost in multiples for a family trip, is a psychological barrier to travel
- Northern Ireland has a smaller tourism offering so an easily avoidable destination if such a short trip proportionately does not justify the expense or hassle of an ETA
- Families (particularly European) will favour the Republic of
- Ireland over Northern Ireland; or the Schengen zone

“You are forcing families to pay unnecessary money ... multiple ETA fees add up for a family” (Tour operator)

OLDER TRAVELLERS VULNERABLE TO ADDITIONAL REQUIREMENTS

- Older travellers benefit and rely on the security, re-assurance and convenience of using tour operators
- Additional costs or processes will need to be carefully managed with, and communicated, to these more anxious customers
- More paperwork or a new online task pre-travel, may encourage older travellers to avoid this destination in order to avoid the uncertainty and anxiety

“What happens if an older traveller hasn't completed it correctly or forgotten to do it, it would create a lot of anxiety on their trip if they realised they didn't have it when we were crossing the border ” (Tour operator)

ETA COULD BE VERY DAMAGING TO BUSINESS TRAVEL

- For companies booking business conferences, an additional requirement like this would be a significant deterrent for fear of those attending being unaware of this requirement
- Additionally, business travellers in general are extra sensitive to additional requirements and hassle and ease of travel and doing business takes priority for them
- Again, this ETA in conjunction with continuing Brexit bitterness may endorse a business decision to travel elsewhere

“Business travellers are very sensitive to any additional requirements, they are more sensitive to the pain of organising a trip than most” (Industry)

SIGNIFICANT CONCERNS EXIST FOR TOUR OPERATORS

- The existing challenging labour market often requires non-CTA citizens to be responsible for both planned and un-planned cross- border travel. A new layer of costs and a procedure will need to be included by employers and tour operators to continue to include these workers on cross-border travel
- The introduction of an ETA will introduce unnecessary hassle for tour operators where passengers will seek information and guidance from their already stretched teams
- It is likely tour operators will start to bypass quick trips to Northern Ireland on their scheduled tours and potentially avoid promoting Northern Ireland in certain instances to avoid the hassle of tourists having to apply for an ETA

“For quick stops in the North, we would start to bypass these on our tours to avoid the hassle” (Tour Operator)

4. SUMMARY

IN SUMMARY:

1. There is undoubtedly poor awareness of this Bill, which is concerning for tourism as it will most likely change traveller behaviour, negatively affect Northern Ireland and cause wider economic implications
2. The ‘unity’ of the Tourism Ireland brand and island of Ireland proposition will be fractured after so much investment and many successful years, where Northern Ireland’s offering (albeit on a smaller scale) has become valuable
3. Northern Ireland will clearly become more isolated and become a harder sell; as an ETA is seen as a border check (even if it may not actually be requested which also causes frustration and confusion)
4. The assumed similarities to ESTA and the PLF forms will increase operational pressures (including cross-border worker concerns), costs and force product offering changes for tour operators etc.
5. Those travellers that can find easier and affordable alternatives – such as families, older visitors, business travellers, short-haul/European markets – are expected to vote first ‘with their feet’
6. FIT (independent) travellers will also be impacted and will require more advanced communication to ensure they are aware of requirements

7. The Bill is viewed as a lack of consideration of the vital impact of tourism to Northern Ireland
8. However, hope exists that Northern Ireland's and the industry's voices will emerge – that exemptions or allowances such as the recent passport adjustment for European travellers will be an option – although time is of the essence
9. If it is passed, clear communication, clarity on its implementation and a simple application process will be required
- 10.