GREAT BRITAIN (GB) TO SCHENGEN AREA ROAD TRANSPORT UNDER THE EUROPEAN UNION'S (EU) ENTRY/EXIT SYSTEM (EES)

GB goods and passenger transport operators' expectations of the EES and Schengen Short Stay rule

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EXECUTIVE SUMMARY

Context

The EU's Entry/Exit System (EES) began a phased rollout on 12 October 2025. It replaces manual passport stamping with a digital register that records each entry and exit for non-Schengen ("third-country") nationals, including United Kingdom (UK) nationals. According to the EU, the EES modernises border checks and enhances the security of Europe's borders. It is expected to lead to greater enforcement of the Schengen area short-stay limit, which caps visa-free stays at 90 days in any rolling 180-day period (90/180), more systematically.[1]

For UK goods and passenger transport operators operating in the Schengen area, this means that all business and leisure travel by UK national drivers in the Schengen area now counts towards the 90/180 limit. Therefore, EES could change how operators plan cross-border services, assign drivers and manage compliance risks.

Aim of the study

The Department for Transport (DfT) commissioned this study to provide a robust pre-EES implementation baseline for UK operators that hold a Standard International Operator Licence (SIOL). The study focuses on goods and passenger transport operators and profiles:

- current operator activity, including the extent and frequency of Great Britain (GB)–Schengen operations
- workforce composition by nationality and residence status
- current monitoring of days in the Schengen area under the 90/180 rule
- awareness of, and early responses to, EES introduction

The findings are intended to build an evidence-based picture of the extent to and ways in which UK SIOL-holding operators are exposed to EES and the 90/180 rule.

Approach to data collection

The study used a mixed-methods design that combined a census-style quantitative survey with in-depth qualitative interviews. The population of interest was all GB-registered heavy goods vehicle (HGV) and light goods vehicle (LGV) and coach operators that hold a SIOL, including both operators who currently use their licence for GB–Schengen work and those who do not. The latter were included because the SIOL dataset used does not distinguish

[1] A full explanation of what EES is and its benefits can be found at: [EU Entry/Exist System: What is the EES?]

which operators actively use their licences, and to try to capture the views of any operators that may have recently stopped operating internationally as a result of EES.

The quantitative element was a push-to-web survey addressed to all SIOL-holding operators identified from the Vehicle Operator Licensing (VOL) database. As of 6 July 2025, this totalled 9,652 goods vehicle operators and 1,702 public service (passenger) vehicle (PSV) operators. Computer Assisted Telephone Interviewing (CATI) was also offered for accessibility and to boost response rates among non-responders. Cognitive testing with eight operators was carried out before launch to refine question wording, question flow, and the time required to complete the survey.

Despite extensive follow-up and additional recruitment, survey response rates were lower than initially hoped. After data cleaning, 435 usable responses were obtained, of which 365 were from goods vehicle operators, and 70 from passenger vehicle operators. The survey was not weighted, so findings should be interpreted as indicative rather than statistically representative of the full population.

A parallel qualitative strand provided depth and context, comprising 42 semi-structured interviews conducted with a purposive sample of survey respondents. The sample covered a spread of operator sizes, sectors and levels of GB–Schengen area activity, including operators that frequently, rarely or never travel into the Schengen area. The interviews followed a common topic guide and were thematically coded.

The timing of this research is likely to have affected responses. The survey and interviews were carried out in September and October 2025, shortly before and just after the formal start of EES on 12 October 2025. EES was being introduced on a staggered basis, with full rollout expected to be completed by April 2026. As a result, the findings reflect operator views during an early implementation period, when awareness was increasing but practical exposure to the new system was still limited and likely to be patchy. Reported impacts may therefore understate the longer-term effects of EES once the system is fully rolled out and more consistently experienced across operators, while awareness and preparedness may have been heightened by communications and media coverage around the point of implementation.

Taken together, the mixed-methods approach provides a structured snapshot of operators' planning and perspectives immediately before, and in the very early stages of, EES implementation. However, results are descriptive, reflect self-reported behaviour and perceptions, and do not capture any operators that have already exited the market.

Summary of findings

Exposure to EU and Schengen travel

Survey evidence suggested that **direct exposure to EES and the 90/180 rule was concentrated among a minority of SIOL-holding operators**. Of the 435 survey responses, 169 operators (39%) reported running services that require cross-border travel between GB and the mainland EU or the wider Schengen area. This included 138 goods operators (38% of surveyed goods operators) and 31 passenger operators (44% of surveyed passenger operators).

Among those who do travel internationally, many did so infrequently. Using monthly travel as a conservative indicator of high frequency of travel and exposure to the 90/180 rule, 88 goods operators and 12 passenger operators in the survey were identified as potentially at risk of having drivers exceed the 90-day limit. This is equivalent to 24% of surveyed goods operators and 17% of surveyed passenger operators.

International activity was more concentrated among larger goods operators. Around 30% of goods operators with up to five vehicles in continuous use reported operating services in the EU or Schengen area, compared with over 50% of goods operators with more than 20 vehicles. Passenger travel was more often infrequent and seasonal, reflecting the nature of coach tours, holidays and school trips.[2]

Both goods and passenger operators reported a heavy reliance on UK national drivers. Among operators that run services to the mainland EU or the Schengen area, goods operators reported that 85% of their drivers were UK nationals on average, while passenger operators reported an average of 96%. Interview evidence suggested that operators are not generally managing exposure to the 90/180 rule through nationality-based recruitment.

Awareness of the 90/180 rule and EES

Awareness of the 90/180 rule was generally high across the survey sample. Overall, 84% of operators reported being somewhat or fully aware of the rule, rising to 96% among operators that reported running services to the EU or Schengen area. Interview evidence was broadly consistent with this pattern, with more EU-facing operators generally showing a stronger understanding of the rule.

Awareness of EES was also highest among operators who travel more frequently. Around 92% of both goods and passenger operators that reported frequent (at least monthly) cross-border services said they were somewhat or fully aware of EES, including 65% that reported being fully aware. Interview evidence suggested, however, that most operators did not have a detailed understanding of the new system and its implications. Some operators remained uncertain about practical issues such as how days should be counted, how leisure travel should be treated, and what compliance would look like in practice once EES was introduced.

2 Passenger operator respondent size profiles are largely in line with averages for PSV SIOL-holders. However, the largest operators, such as FlixBus and National Express, did not respond to our request for comment.

Preparedness for EES implementation

Preparedness for EES appeared mixed. Survey responses suggested that, among operators running EU or Schengen services, 70% of goods operators and 81% of passenger operators monitor drivers' workdays in those countries. However, the corresponding figures for monitoring leisure days were lower, at 43% for goods operators and 55% for passenger operators. Only 38% of goods operators and 52% of passenger operators reported monitoring both work and leisure days.

Interview evidence suggests that **monitoring was often lighter and less complete than the survey results alone implied**. Many operators described relying on existing rota systems, simple spreadsheets or drivers' own records rather than formal systems designed to capture full exposure to the 90/180 rule. Where monitoring was not carried out, operators usually cited low perceived risk or limited enforcement to date, rather than the administrative cost of doing so.

A minority of operators reported making operational changes in response to EES or the 90/180 rule, and reported changes were limited in scope. Among operators that ran services in the mainland EU or Schengen area, 70% of goods operators reported no operational changes in response to EES or the 90/180 rule, compared with 52% of passenger operators. Passenger operators were more likely to report practical preparations such as allowing more time at ports, adjusting journey timings or preparing information for passengers. Goods operators were more likely to say that they had not yet adapted, often because they had not experienced direct enforcement effects or hoped that some form of policy mitigation might still emerge.

Impact of the 90/180 rule and EES

Impacts to date have been limited for many operators

Reported impacts to date were mixed for many operators, with negative responses deriving mostly from those that do not regularly run services to the mainland EU or the Schengen area. Interview evidence suggested that, for many operators, this may reflect both low exposure to the 90/180 rule and the fact that manual passport stamping has made the rule difficult to enforce consistently in practice.

Most interviewees perceived that the 90/180 rule had not yet forced major operational changes. Some operators that regularly travel to the EU or Schengen area accepted that drivers may already have exceeded the 90-day limit at times, but said that, in practice, this had not led to routine challenge or sanction.

Future impacts from EES are expected to be more significant

Operators were more likely to expect negative impacts from EES than to report substantial impacts to date from the 90/180 rule alone. Among operators running EU or Schengen services, 46% of goods operators and 55% of passenger operators reported that EES had already had a somewhat or very negative impact on their organisation. When asked about future impacts, this rose to 59% of goods operators and 68% of passenger operators.

These concerns were strongest among operators travelling more frequently to the mainland EU or the Schengen area. Interview evidence suggests that operators saw EES and the 90/180 rule as closely linked, with EES expected to make time spent in the Schengen area easier to record and the 90-day limit easier to enforce. For many operators, this is the main reason why expected future impacts were more negative than current reported impacts.

Border delays and disruption are an immediate concern

One of the concerns reported more commonly during interviews was that EES would increase delays at the border, particularly during the early stages of implementation. Passenger operators were especially concerned about queues at ports, longer processing times, and the knock-on effects for passengers, journey times and compliance with drivers' hours rules. These concerns were most commonly mentioned by operators carrying school groups, holiday travellers and other passengers who may be more affected by delays and border processing requirements.

Goods operators also raised concerns during interviews about added friction at the border, although these concerns were often discussed alongside the wider customs and regulatory pressures already affecting EU-facing work. For some operators, especially those moving specialist goods, the risk was not only the delay itself, but the way delays could disrupt tightly planned schedules and affect future assignments.

The main business risk is reduced operational flexibility

Interview respondents perceived that EES may reduce operators' ability to run their existing operating model in the way they do now. Operators reported they have not generally adapted recruitment or route allocation around nationality or 90/180 exposure. Instead, they reported continuing to allocate international work mainly based on skills, experience, driver preferences and availability.

This matters because, if EES makes the 90/180 rule more binding in practice, operators may have less flexibility to deploy their existing drivers across domestic and international work. Some operators interviewed expected that they would need to rotate drivers more often, employ additional staff, reduce the frequency of EU-facing trips, or shift towards a more UK-focused operating model. These concerns were strongest among operators whose business depends on regular or specialist EU work, where switching to domestic activity may not be realistic.

Some operators fear competitiveness and viability impacts

A further concern raised in interviews was that stricter enforcement could weaken the position of GB operators relative to EU- and Schengen-based competitors. Some operators feared that firms based in the EU would be better placed to undertake cross-border work if GB operators face tighter staffing constraints under the 90/180 rule. For these operators, the issue was not limited to administrative burden at the border, but extended to competitiveness, contract retention and long-term business viability.

These risks were raised most strongly by operators involved in regular or specialist EU-facing work, including some niche goods and passenger services. A small number of operators described the possibility of reducing EU work, restructuring parts of their business, or in extreme cases questioning whether their current operating model would remain viable.

Wider impacts may extend beyond directly exposed operators

Although the strongest concerns came from operators running EU or Schengen services, a smaller number of operators not directly engaged in international work also anticipated indirect effects. In the survey, 15% of goods operators and 31% of passenger operators that do not work in the mainland EU or Schengen area still expected a negative impact from EES. Interview evidence suggests that these concerns related mainly to knock-on effects through supply chains, delays, higher costs and wider disruption across the transport sector.

Overall, the impact evidence suggests that EES is unlikely to affect all SIOL-holding operators in the same way. For many operators, direct effects may remain limited because their exposure to EU and Schengen travel is low. For a smaller but important group of more exposed operators, however, EES may turn what has so far been a weakly enforced constraint into a more binding operational and commercial challenge.

Table 1 displays the glossary of key terms and acronyms used within this report.

Table 1 Glossary of key terms and acronyms

Term	Explanation
90/180 Schengen rule (duration of stay limitations)	The Schengen rule is a duration-of-stay limitation that caps the total number of visa-free days for third-country nationals within the Schengen area at 90 in every 180-day period for both work and leisure journeys.
CATI	Computer Assisted Telephone Interviewing – a structured interview conducted by phone.
Census-style approach	An approach that invites everyone in the relevant list or 'population' to take part, rather than selecting a smaller sample.

Term	Explanation
Coach	A comfortably equipped single-deck passenger transport vehicle, used for transporting passengers from the UK internationally, for example, holidaymakers and touring musicians. A passenger transport, standard international operator licence is required to operate a vehicle for hire or reward (payment or payment in kind) that can carry nine or more passengers internationally.
Cognitive testing	A method used to test respondents' cognitive understanding of survey questions and answer options, to improve wording and question order before the full launch.
Contextual factor	The external conditions that influence how the direct and indirect impacts of an intervention, policy or shock are realised.
CPT	Confederation of Passenger Transport – a UK trade association representing bus, coach, light rail, and metro operators.
Descriptive analysis	The process of summarising and interpreting data to inform a high-level understanding of the wider setting and analysis.
DiD	Difference-in-differences – compares changes over time in operators impacted by EES implementation through enhanced enforcement of the 90/180 limit, with changes over time in a similar comparison group that was not impacted by this enhanced enforcement.
Enforcement of the 90/180 rule	The anticipated increase in the enforcement of the Schengen area 90/180-day immigration limit following the implementation of EES.
Entry/Exit System (EES)	Entry/Exit System – an EU-implemented automatic register of personal details, for any third-country national arriving at a Schengen border crossing point. Scheduled to become operational in October 2025.
Feeder Drivers	Drivers who move cargo between locations including warehouses, sorting facilities or into central hubs for onward distribution or collection working on local or regional routes.
GB	Great Britain – refers to the mainland UK, including England, Scotland and Wales but not Northern Ireland.
GDPR	General Data Protection Regulation – data protection rules that set out how personal data must be collected, used, and stored lawfully and securely.
HGV	Heavy Goods Vehicle – vehicles with a Maximum Authorised Mass of over 3,500kg.
LGV	Light Goods Vehicle – usually a van or similar small vehicle which weighs more than 2,500kg and less than 3,500kg Maximum Authorised Mass either alone, or when used with a trailer.
Likert scale	A standard response scale that measures views using options such as 'strongly agree' to 'strongly disagree'.

Term	Explanation
Margin of error	A statistical measure that defines the range within which the true value is expected to lie, given the sample size.
Methodology report	An initial phase of work entitled "Methodological approach to gathering evidence from GB goods and passenger transport operators", was undertaken from Spring to Summer 2025, during which Frontier Economics and SYSTRA developed a monitoring and evaluation framework for EES.
Mixed methods	A research approach that combines quantitative data (for example, surveys) with qualitative data (for example, interviews).
Occasional passenger transport services	Any type of journeys not counted as a regular or special regular service (for example, holiday tours).
Population group	The full group you want to understand or draw conclusions about (for example, all GB operators running international services).
Public Service Vehicle (PSV) operator licence	A Public Service Vehicle operator licence is required to operate vehicles that are designed or adapted to carry nine or more passengers, and payment is taken for carrying passengers (hire or reward) this category includes buses or coaches, either on scheduled routes or for private hire. It includes four licence types: standard (national) standard (international), restricted (maximum of two vehicles, normally eight passenger seats or fewer), and special restricted (licensed private hire or taxi operators running local services, with stops less than 15 miles apart).
Purposive sample	Selecting participants deliberately to cover a range of relevant characteristics (for example operator type or size), rather than selecting at random.
Push-to-web survey	A survey approach where people receive an invitation by post (or email) that directs them to complete the survey online.
Regular passenger transport services	Following a timetable, transporting passengers between fixed points along a specified route.
RHA	Road Haulage Association – a UK trade body representing road transport operators.
RORO	Roll-on, roll-off – road goods travelling to Europe via vessels that are designed for cargo to be wheeled on and off.
Sample group	The subset of the population group that provides data and is used to draw conclusions about the wider population.
Schengen area	Comprises 29 European countries that have abolished border checks at their common or internal borders.
SIC code	Standard Industrial Classification codes – standardised sector identifiers commonly used by the Office for National Statistics (ONS).

Term	Explanation
SME	Micro-, small-, and medium-sized enterprises – any organisation that has fewer than 250 employees and an annual turnover less than or equal to £44m or a balance sheet total of less than or equal to £38m.[3]
Special passenger transport services	A regular service carrying specified types of passengers (for example, taking workers between home and work).
Standard International Operator Licence (SIOL)	Goods Vehicles: The Standard International Operator Licence is required for operating goods vehicles over 2,500kg Maximum Authorised Mass internationally for payment (hire and reward). Holders of these licences can run fleets comprised entirely of HGVs or LGVs or fleets with a mixture of the two vehicle types. Passenger Transport: PSV Standard International Operator Licences are applicable to vehicles that are designed or adapted to carry nine or more passengers. Vehicles that carry fewer passengers would normally be licensed as taxis.
TCA	Trade and Cooperation Agreement – the agreement that sets out the framework governing the relationship between the UK and EU for cooperation, including in relation to road transport.
Thematic analysis	A way of analysing qualitative data by coding responses and grouping them into repeated themes and patterns.
VOL database	The Vehicle Operator Licensing database – the central digital system used in Great Britain to manage, process, and record all goods and public service vehicle operator licences. It is operated jointly by the Driver and Vehicle Standards Agency (DVSA) and the Traffic Commissioners for Great Britain.

Source: Frontier Economics

[3] https://www.gov.uk/government/publications/procurement-act-2023-short-guides/supplementary-information-small-and-medium-sized-enterprises-definition-html

1 Introduction

1.1 Background and purpose

The EU's Entry/Exit System (EES) introduces a new digital process to record the entry and exit of non-EU and non-Schengen nationals, including UK nationals, to strengthen border control and to enforce the 90-days-in-180-days short-stay rule in the Schengen area (90/180). The system began operating on 12 October 2025 and is being phased in over a six-month period, with full implementation expected by April 2026.

The Department for Transport (DfT) has commissioned pre-EES implementation data collection and analysis to understand how EES, together with stronger enforcement of the 90/180 rule, is likely to affect Great Britain (GB) to Schengen area goods and passenger operations. This work focuses on GB-registered goods and passenger operators that hold a Standard International Operator Licence (SIOL), meaning they are licensed to operate these routes, who may face new constraints in planning and resourcing cross-border services.

This report presents the findings from that data collection. It draws on quantitative survey data and qualitative interviews collected between September and October 2025, covering the weeks immediately before EES became operational and in the early stages of the phased rollout. The findings provide a structured picture of operators' current profiles, workforce composition, monitoring practices, and perceived impacts, before EES is fully implemented. The report is intended to describe the industry position at the start of implementation and to create a benchmark against which future monitoring and evaluation of EES impacts can be undertaken.

1.2 Summary of methodology report findings

This study forms part of a wider programme of work on GB to Schengen area road transport under the EU's EES. The methodology report, entitled "Methodological approach to gathering evidence from GB goods and passenger transport operators", was undertaken from Spring to Summer 2025, during which Frontier Economics and SYSTRA developed a monitoring and evaluation framework for EES. That work combined an evidence review and data-mapping exercise to identify what is already known about GB–Schengen goods and passenger operations and where the key data gaps lie. It highlighted a set of core evidence themes, including the composition and nationality of drivers, operator characteristics and business models, and the volume, frequency, and duration of GB–Schengen journeys.

The methodology report found that existing data sources could not provide several indicators critical for understanding EES impacts, such as GB operators' dependence on UK-national drivers for cross-border work, the flexibility of operating models and the extent to which driver rotations already allow individual drivers to stick within the 90/180 rule. Therefore, it was recommended that new primary data collection be conducted using a mixed-methods baseline, structured around agreed research questions and an indicator set.

1.3 Scope

The data presented in this report uses a census-style, push-to-web survey of SIOL-holding operators, supported by telephone interviewing and an in-depth qualitative programme, to provide rich contextual evidence on the pre-implementation state of passenger and goods operators and whether and how operators are responding to the 90/180 rule and preparing for EES.

The study focuses on GB–Schengen movements undertaken by GB-registered goods and passenger operators. It covers cross-border journeys between GB and the mainland EU or Schengen area countries, including services that transit multiple Schengen states. Movements wholly within the Common Travel Area, for example, GB–Ireland trips, are outside the scope of this study.

The population of interest is GB-registered goods and passenger operators that hold a SIOL. This includes:

- operators that currently conduct at least some business in the Schengen area
- operators that hold an SIOL but are not presently operating in the Schengen area, who provide an important context group for understanding the wider GB operating environment and potential future responses

The survey and interview samples were drawn from this population and are designed to capture a range of operator sizes, service types and patterns of international activity.

2 EU Entry/Exit System

This section provides background context to the introduction of the EU's EES, including the previous operational status quo and the rationale for introducing the new system. It then covers what this policy change means for travellers in practice. Lastly, the relevant research questions explored in this study and preceding work are outlined.

2.1 Background

As of April 2026, the EU's EES is fully operational at all external border crossing points of the countries using EES.[4] However, at the time of data collection (September to October 2025), the EU was preparing for the phased rollout of the new EES, designed to strengthen border controls, improve how it monitors the days individuals (non-EU or Schengen nationals) spend in the Schengen area, and automatically enforce duration-of-stay limits. A full list of the benefits is available from the EU advice pages: What is the EES?

Duration-of-stay limitations for visitors to the EU and Schengen area have been in force continuously for non-EU or Schengen nationals since 1999 and have applied to UK nationals since 2021. These rules allow non-EU or Schengen nationals to stay in the Schengen area for a maximum of 90 days within any 180-day rolling period. Until recently, compliance monitoring of the 90/180 rule has been limited to manual tracking of visitor days through passport stamping by border guards.

The EU's EES introduces an electronic system to monitor the number of days visitors spend within the Schengen area, replacing manual passport stamping with an automatic register. This register collects the personal details of any third-country national arriving at the border crossing point, including name, travel document, biometrics and the date and place of entry or exit.

The new system strengthens EU border security by enabling automatic, systematic enforcement of duration-of-stay limits and enhanced detection of overstaying by easily identifying non-EU nationals who do not meet entry conditions or who stay longer than permitted in the Schengen area.

The rollout of EES began on 12 October 2025, after several delays. Originally planned for 2022, implementation was postponed to 2023, then to late 2024, and finally to 2025.[5] The full timeline is set out by The House of Commons: The EU EES and EU travel authorisation system. The system will be phased in across six months, becoming fully operational by 10 April 2026. Until then, uptake and usage of the new system are expected to vary. This means

[4] Travel in Europe with the European Entry/Exit System (EES) | EEAS

[5] The European Commission first proposed the new Entry/Exit System (EES) in April 2016 as part of a revised Smart Borders Package. In December 2024, the EC proposed the start of operations of EES. The progressive start of EES operations entered into force in July 2025. In July, the EC set 12 October as the launch date for the start of EES operations.

that even at the same border crossing, the method used to register visits (EES or passport stamps) may vary, depending on operational factors.

2.2 Research questions

Building on the methodology report, we expected EES to influence operators' commercial and operational behaviour. Therefore, we included baseline questions to examine current commercial and operational characteristics, as well as the anticipated effects of EES.

- **Operator characteristics**. What are the characteristics of operators holding a SIOL?
  - Scale (eg annual turnover and number of employees)
  - Type (eg private, public, or not-for-profit)
  - Industry (eg primary activity and SIC)
  - Geography of operations (eg UK/EU split)
  - Partnerships with EU-based operators (eg existence and strength of partnerships)
- **Driver management, assignment, and rotation**. How are organisations currently managing driver allocations?
  - How do businesses operate currently with regard to how they manage drivers, assign work across employees, and rotate their staff between routes?
  - How do operators recruit for international travel? Does this differ from how they recruit for domestic travel, and what factors do they consider in recruitment?
  - What costs are associated with driver management, assignment and rotation, and are these a significant proportion of overall operating costs?
- **Experience since the end of the UK's transition period**. How has the 90/180 rule impacted businesses so far?
  - To what extent are businesses aware of the 90/180 rule?
  - How has the 90/180 rule impacted operations to date?
  - What changes have businesses made to their operations to comply with the 90/180 rule?
- **Awareness, preparedness, and anticipated impacts of EES**. How ready are businesses for EES, and what impacts do they expect on their operations?
  - Are businesses aware of EES and its details?
  - How prepared are businesses for EES? To what extent have they already made adjustments, and how will this affect their operations?
  - What challenges and risks do businesses anticipate facing in the short and medium term as a result of EES?

3 Methodology and sampling

This section covers the methodology for the quantitative survey, including survey design, boosting responses, and data cleaning, and summarises the key characteristics of the businesses sampled. In addition, this section covers the methodology for the qualitative interviews, including interview structure and key areas covered in the topic guide. Finally, this section summarises the analysis of the quantitative survey results and qualitative interview results and highlights potential limitations.

The primary research for this study took a mixed-methods approach, combining quantitative (an online survey) and qualitative (in-depth interviews) techniques.

The points below provide an overview of the data collection process and timeline:

- survey questionnaire and qualitative topic guide design (21 July to 8 August 2025)
- cognitive testing of survey and abridged in-depth interviews (11 to 19 August 2025)
- online survey made available for responses (5 September to 24 October 2025)
- in-depth interviews conducted (16 September to 17 October 2025).

This mixed-methods approach to data collection was selected because it enables a more comprehensive understanding of the subject matter. The survey, with its relatively high response rate, provides a broad overview of industry experiences and opinions. Although the response pool is smaller, evidence from the qualitative research provides a deeper understanding and wider context than the survey. By applying a mixed-methods research design, evidence sources can be triangulated, providing a more robust output.

3.1 Quantitative survey approach

3.1.1 Sample frame

The population of interest for the quantitative survey was:

- HGV operators registered in GB that hold an SIOL and undertake at least some of their business in the Schengen area
- coach operators registered in GB that hold an SIOL and undertake at least some of their business in the Schengen area
- HGV operators registered in GB that hold an SIOL but do not use it
- coach operators registered in GB that hold an SIOL but do not use it

SYSTRA identified in-scope operators for the survey using the publicly available 'Vehicle Operator Licensing (VOL) database. This data was shared with Field Locker (an agency specialising in recruiting participants to research studies).

Field Locker accessed sample lists to match the records within the list of in-scope operators against contact information (such as name, business address, email address, and telephone number). The sample lists were accessed via the brokers' Datascope: Datascope homepage, Dunn & Bradstreet: D&B Privacy Notice, and Experian: Consumer Information Portal | Experian, and were all sourced in compliance with GDPR.

3.1.2 Survey design

The survey questions and content were designed in close collaboration between SYSTRA, Frontier Economics and DfT.

The quantitative metrics for collection were defined based on the methodology report, which identified gaps in information necessary to develop a fuller understanding of the existing industry activity prior to EES implementation. Evidence gaps identified in the methodology report included:

- the dependency of GB-registered HGV and coach operators that hold SIOLs on UK- or non-EU-national drivers (specifically for cross-border travel into the Schengen area)
- the current HGV and coach operators' operating models, the flexibility to shift these models, and the associated costs
- a greater understanding of the trends of coach operators, and passengers that travel by coach into the Schengen area, and the average duration of coach tours by month
- the extent to which operators had anticipated EES implementation and the responses taken to the limitations on the duration of stay
- the broader contextual factors relating to the effects of the UK-EU Trade and Cooperation Agreement (TCA) on cross-border movements of operators, and cross-border flows of goods and people

Considering these evidence gaps, we defined several indicator categories to improve understanding of EES pre-implementation. These categories included:

- **direct indicators**: such as the number of GB operators that conduct operations within the EU and the nationality of drivers
- **indirect indicators**: such as an understanding of the distribution of market share within the HGV and coach operator industries
- **contextual indicators**: such as the business models and the extent to which driver rotation is based on the number of days spent in the EU.

These indicators were drafted into survey questions. The questions were ordered to form a logical flow from one topic to the next. The survey covered the following topics (see the full questionnaire in Annex A):

- background details of the organisation

- current operations
- vehicle drivers
- organisation revenues
- changes in operations due to the 90/180 Schengen rule
- changes in operations due to EES implementation

3.1.3 Cognitive testing

Before launching the survey, eight cognitive interviews were undertaken with a mix of goods and passenger operators holding an SIOL. Participants for the cognitive interviews were recruited by Field Locker and interviewed by SYSTRA.

The purpose of the cognitive interviews was to ensure that participants fully understood and interpreted the survey questions as intended. The interviews also provided an indication of survey duration and ease of completion for different styles of questioning.

The interviews were conducted with the aid of a scripted online survey to ensure participants completed the questions and experienced the survey in the same way as they would during the live fieldwork. Screen sharing was used via MS Teams so both the moderator and the interviewee could see the survey being completed. Participants were invited to 'think-aloud', narrating their experiences and understanding of each question, with their views noted down by the SYSTRA moderator.

The feedback from the eight interviews was collated into a single summary note and shared with DfT for review. The note documented each interviewee's comments against each question, with an accompanying recommendation on whether (and how) the comment could be actioned. Each action was discussed among SYSTRA, Frontier Economics, and DfT, and the agreed actions were applied to the script to inform the final survey design for the main fieldwork phase. In summary, the changes applied to the survey following the cognitive testing were:

- some minor wording changes to provide clarification on the information requested, or to remove ambiguity in the answer options provided
- the inclusion of 'not applicable' answer options, and the recategorisation of revenue bands so respondents could respond accordingly to questions that do not apply to their organisation's operations
- removal of a small number of questions, which added significantly to the survey duration

To encourage participation, cognitive testing participants received an incentive payment of £100, distributed as gift vouchers by Field Locker.

3.1.4 Survey distribution

A census approach was used for survey distribution, with all operators in the sample frame invited to complete the survey. This approach was taken to ensure the views of all in-scope operators who wanted to share their opinions could be captured. However, response rates were monitored to ensure a variety of organisations responded (a mix of business sizes, sectors, and types of operations), as previous research has indicated that the impacts of EES implementation may vary by the characteristics of businesses operating internationally.

A postal 'push-to-web' approach was used, with the primary means of completion through an online survey form. Computer Assisted Telephone Interviewing (CATI) was offered as a secondary data-collection method for those who preferred to provide their views in that format. Using the names and addresses from the matched records in the sample frame, each operator was sent a two-sided invitation letter. The letter included:

- a summary of the research, including context, survey duration, and fieldwork window
- a QR code and hyperlink to the survey
- details regarding the prize draw
- a hyperlink with further information on EES implementation
- confirmation on how the data would be used, including a link to the privacy notice
- logos for DfT, SYSTRA, Frontier Economics, and Field Locker, to provide authenticity to the letter

3.1.5 Boosting survey responses

Following the distribution of the invitation letter to operators, survey response rates were closely monitored and Field Locker followed up with phone calls as a reminder to non-respondents. Operators had the choice of completing the survey with a Field Locker team member on the phone, entering their responses directly into the script (CATI), being re-sent the QR code or hyperlink to their email address, or completing the survey in their own time.

Despite follow-up calls, responses to the survey remained low compared with expectations, particularly among larger businesses. Therefore, in addition to the telephone reminders:

- SYSTRA identified a further 96 contacts in the road haulage sector through a web-based exercise, of which 30 were prioritised due to their size and volume of international travel.
- Field Locker offered an additional incentive of £10 to operators who had previously been contacted and re-sent the survey link.
- DfT wrote to industry bodies to promote and raise awareness of the research. These letters encouraged organisations to participate in a bid to maximise reach and response rates.

The survey period was also extended by two weeks, changing the deadline from 10 October to 24 October 2025, to accommodate these additional strategies and maximise the sample size. This extension was anticipated to have minimal impact on the results, given that the staggered rollout of EES meant that most organisations were unlikely to have experienced the new system by 24 October.

In total, 435 responses were received before data cleaning, with the large majority from goods (84%) compared to passenger operators (16%).

Table 2 below shows differences in fleet size (number of authorised vehicles) between the companies that responded to the survey and all operators featured in the industry database. Compared with the Vehicle Operator Licensing (VOL) database, the mix of goods operators who responded to the survey had a larger share of very small (up to one authorised vehicles) and very large fleets (more than 20 vehicles), and fewer mid-sized fleets. On the other hand, for passenger operators, the fleet size distribution of survey respondents closely matches that of all operators in the database. This means findings for goods operators may be less representative of the whole sector than those for passenger operators. Further detail can be found in Annex D1.

Table 2 Fleet sizes (number of authorised vehicles) for survey respondent operators vs. for operators registered in VOL

	Goods operators			Passenger operators		
Fleet size	**Survey sample (%)**	**Population group (%)**	**Difference (percentage points)**	**Survey sample (%)**	**Population group (%)**	**Difference (percentage points)**
0 to 1 vehicle	19%	11%	+8	6%	7%	-1
2 to 5 vehicles	32%	47%	-15	30%	32%	+2
6 to 10 vehicles	22%	19%	+3	16%	19%	-3
11 to 20 vehicles	10%	11%	-1	23%	20%	+3
More than 20 vehicles	17%	11%	+6	24%	21%	+3

Source: Goods and public service vehicle operator licence records database (VOL), SYSTRA Ltd.

Note: Rounding means percentages may not always sum to 100%.
Survey sample = survey respondents
Population group = VOL database

3.1.6 Data cleaning

During the fieldwork period, interim data files were sent from Field Locker to SYSTRA. This allowed SYSTRA to conduct early checks on the data and to set up data-cleaning code in RStudio, a software for statistical analysis. The data cleaning process included checks for duplicate IDs, identifying potential flatliners (for example, identical responses to a list of Likert scale questions), and identifying contradictory responses. Further detail on the data cleaning checks can be found in Annex D2.

3.1.7 Summary of survey respondent characteristics

The survey screened responses into two groups of respondents. Organisations that:

- operate vehicles transporting goods on the road (HGVs, LGVs, and mixed fleets)
- operate vehicles transporting passengers on the road (bus and coach operators)

The survey collected a set of business demographic data for each respondent operator, including details on:

- fleet size
- business size (by revenue)
- number of drivers
- types of goods transported or types of services provided
- whether it conducts business operations requiring cross-border travel between the UK and mainland EU or the Schengen area.

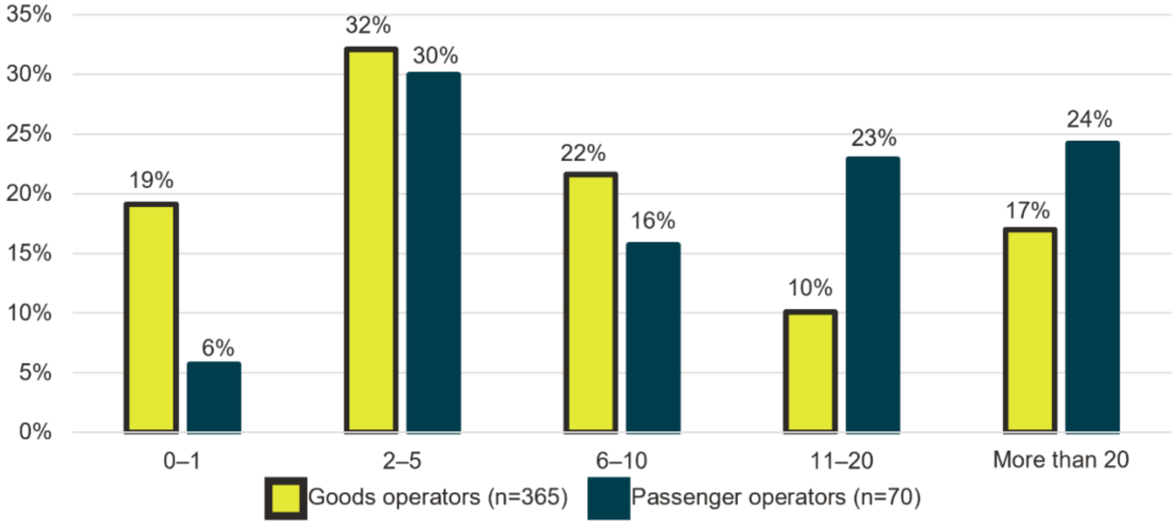
Key points to note on the survey sample demographics are summarised below by demographic characteristic (the full set of sample demographics is presented in Annex B).

Fleet size

Figure 1 displays the respondent operator breakdown by fleet size. The most common (modal) fleet size amongst survey respondents was two to five vehicles, for both goods and passenger operators. A combined 73% of goods operator respondents fell into the three smallest fleet size categories in the chart below ('0–1', '2–5', and '6–10'), whereas 51% of passenger operator respondents fell into the same categories.[6]

[6] Note that the reported proportion of passenger operators with up to 10 vehicles differs to the graph due to rounding. The proportions correct to one decimal point are: 0-1 (5.7%), 2-5 (30%), 6-10 (15.7%).

Figure 1 Fleet size (number of vehicles)



Source: Frontier Economics

Note: Question asked: "In total, how many vehicles does your company have continuous use of at present?" 365 goods operators responded to this question in total, and 70 passenger operators responded in total. "Don't know" responses have been suppressed.

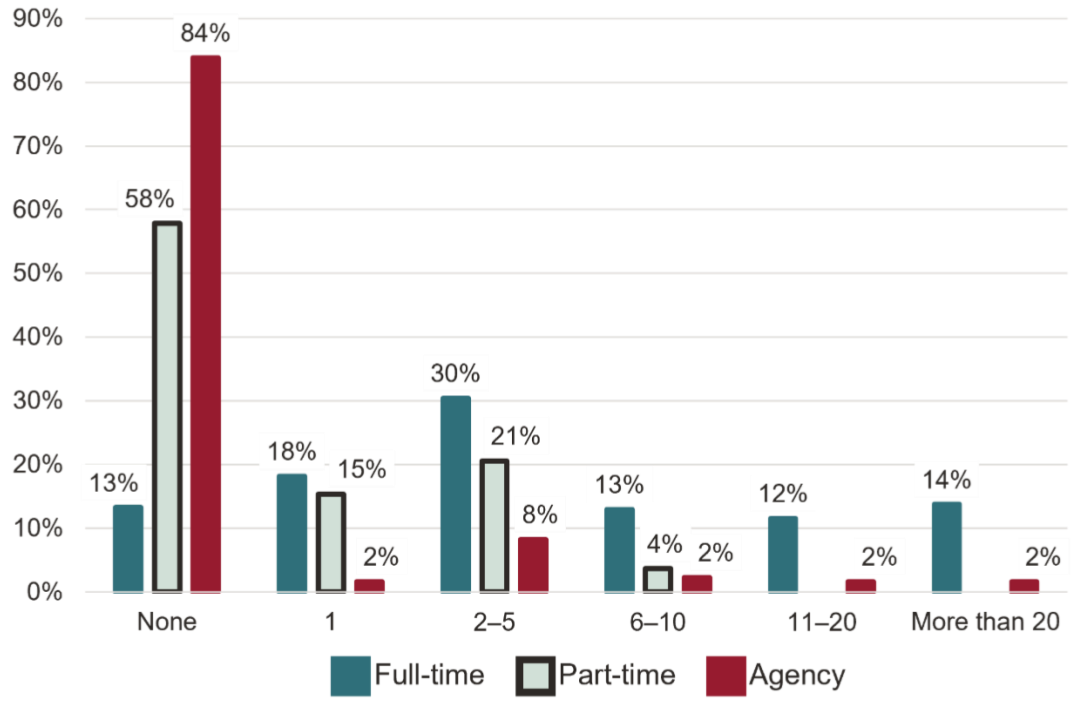
Business size

According to respondents' approximations of annual business turnover, the majority of both goods and passenger operator groups in the sample are micro businesses (turnover of less than £1 million per year). However, 18% of goods operators and 23% of passenger operators responded to this question with 'Prefer not to say' or 'Don't know'.

Number of drivers

Respondent breakdown by number of drivers is presented for goods and passenger operators in Figure 2 and Figure 3, respectively. Among survey respondents, passenger operators were more likely than goods operators to employ part-time drivers, with 73% of passenger operators employing part-time drivers (most commonly two to five drivers), compared with only 42% of goods operators. There was limited use of agency drivers, with only 15% of goods operators and 9% of passenger operators hiring agency driver staff as part of their operations.

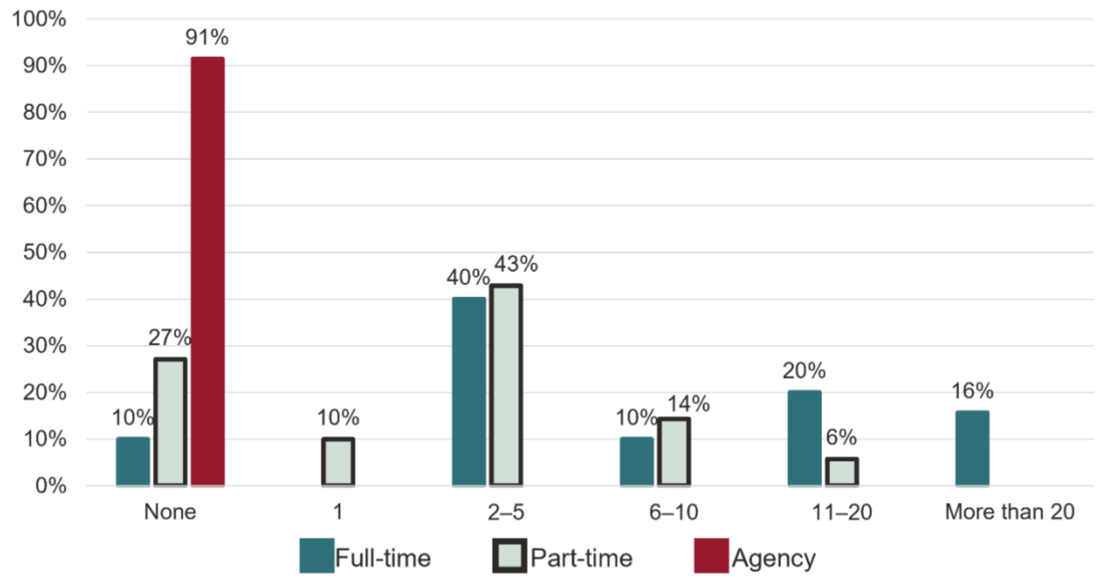
Figure 2 Number of drivers employed by goods operators



Source: *Frontier Economics*

Note: *Question asked: "Approximately, how many of each type of employee work for your organisation?" 365 Goods operators responded to the question in total.*
Responses that relate to less than four responses have been suppressed. "Don't know" responses have been suppressed.

Figure 3 Number of drivers employed by passenger operators



Source: Frontier Economics

Note: Question asked: "Approximately, how many of each type of employee work for your organisation?" Seventy passenger operators responded in total.
Subgroups that relate to less than four responses have been suppressed. "Don't know" responses have been suppressed

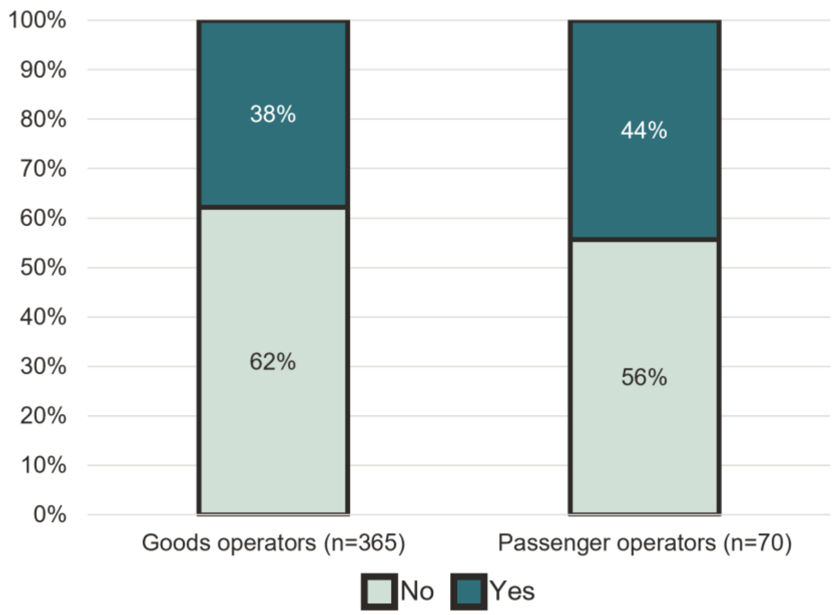
Types of goods transported or services offered

The top five types of goods that operators reported transporting were 'Other' goods (33%); food products including beverages and tobacco (29%); machinery and equipment (28%); empty containers, pallets and other packaging (26%); and furniture and other manufactured goods (20%). The full list is provided in Annex B. Passenger operators responded most commonly with 'Occasional passenger services' (83%), followed by 'Regular passenger services' (26%), and 'Special passenger services' (13%).[7]

Operations in mainland EU or the Schengen area

Among the sampled survey respondents, 38% of goods operators and 44% of passenger operators said they operate international services that require cross-border travel between the UK and the mainland EU or the Schengen area. This breakdown is displayed in Figure 4.

Figure 4 Operations in mainland EU or the Schengen area



Source: Frontier Economics

Note: Question asked: "Does your organisation currently run any international services that require cross-border travel between the UK and the mainland EU or the Schengen area?" 365 goods operators responded, and 70 passenger operators responded, all giving either 'Yes' or 'No' as an answer.

[7] *Regular services: following a timetable, transporting passengers between fixed points along a specified route. Special regular services: a regular service carrying specified types of passengers (eg taking workers between home and work). Occasional services: any type of journeys not counted as a regular or special regular service (eg holiday tours)*

3.2 Qualitative interview approach

3.2.1 Interview structure

A semi-structured topic guide was developed by SYSTRA, in close collaboration with DfT and Frontier Economics (see Annex A). A semi-structured interview design was selected as this interview format allows the required data to be collected whilst permitting participants to explore topics not explicitly covered by the topic guide. The list of relevant indicators and metrics identified in the methodology report was used as a starting point for developing the topic guide. The list of indicators to be covered through the primary qualitative research included:

- the relationship between nationality and route assignment
- the types of operating models and flexibility to shift
- the extent to which driver days in the Schengen area or EU are currently monitored and managed, including driver leisure days
- the effects on the monitoring of driver days in the Schengen area or the EU, and management methods
- information on partnerships between UK and EU operators and changes over time
- current driver rotation patterns and flexibility to make changes
- the effects on the length of driver rotations and recruitment practices
- the distribution of cross-border trip duration and evolution over time
- the principal routes for scheduled travel and their proportion of total cross-border passenger transport

The topic guide was designed to ensure flow and guide the participant chronologically through the past five years to the rollout of EES. Discussions started with general questions about the business and its drivers, moved on to discuss any changes the business has experienced over the past five years, focusing on the 90/180 rule, and finally explored the impacts of EES implementation.

The topic guide covered:

- organisation characteristics
- characteristics of current operations in the mainland EU and the Schengen area
- flexibility of organisation to change operations
- driver characteristics, focusing on their rights to live and work in the mainland EU and the Schengen area and driver assignments
- flexibility of organisation to make changes to driver rotation patterns
- changes in operations since the UK's EU exit
- awareness of the 90/180 rule

- changes in operations since the introduction of the 90/180 rule
- awareness of EES
- changes in operations due to the implementation of EES
- measures that could help operators manage the changes caused by the implementation of EES

The population of interest and eligibility criteria for the qualitative interviews were the same as for the quantitative survey (see Section 3.1.1). Although preference was given to operators that run services in the EU or Schengen area, interview participants included those operators who held an SIOL but were not running international services. The main reason was to capture cases where operators had recently ceased international operations. Participants for interviews were recruited from the survey, and all survey respondents were asked whether they wanted to volunteer for an in-depth interview. Interview participants were given an incentive payment of £75, which Field Locker distributed as gift vouchers. Note that all interview participants were representatives of companies that were still in business at the time of the interview.

Forty-two in-depth interviews with representatives of goods and passenger operator companies were conducted between 16 September and 17 October 2025. The in-depth interviews were originally planned to take place between 8 September and 10 October 2025, but the fieldwork period was extended by two weeks, to 24 October 2025, to achieve a higher response rate.

Of the in-depth interview participants, 35 represented goods operators, and seven represented passenger transport companies. There was variation across the companies represented by participants in terms of size, driver characteristics, and whether they operated in mainland EU or Schengen area countries. For Schengen-operating companies, the frequency of operations varied. Operators who frequently travelled into the mainland EU and the Schengen area tended to operate in specialist industries, including the entertainment industry and horse transport.

Interviews typically lasted between 45 minutes and one hour and were led by a SYSTRA researcher. Interviews took place on MS Teams, or, where preferred by the participant, over the telephone, and all interviews were auto-transcribed using MS Teams' transcription functionality. Following auto-transcription, the researcher reviewed the transcript and entered the findings into an analysis matrix in MS Excel. Each interview was assigned a number to ensure that it could be identified while maintaining the participant's anonymity.

The following frequency of travel classifications were used to report the findings:

- Frequent travel to EU/Schengen area: operators who typically travel to the mainland EU or Schengen area countries once a month or more often (19 operators)
- Rare travel to EU/Schengen area: operators who travel to the mainland EU or Schengen area countries less frequently than once a month (10 operators)

- Never or very rare travel to EU/Schengen area: operators who have not travelled to the mainland EU or Schengen area countries for the past five years, or have never done so (13 operators)

Operator size was classified by the number of drivers who drive for the company, including those employed by the company and agency workers:

- 1 driver (6 operators)
- 2 to 5 drivers (13 operators)
- 6 to 10 drivers (11 operators)
- 11 to 20 drivers (<4 operators)
- More than 20 drivers (9 operators)

3.3 Analysis and limitations

3.3.1 Quantitative survey analysis

A summary of the survey analysis methodology is presented in Annex D3. The quantitative results rely on findings from the survey shared with operators. The following limitations should be considered when interpreting the results:

- Descriptive, not causal: the survey and analysis were designed to provide a pre-implementation snapshot and indicators for monitoring, not to estimate the causal effects of EES. Any patterns explored should be considered as associations.
- Coverage and representativeness: even with the efforts to contact a wide range of operators, some groups may be under-represented or have ceased operation. A lack of reliable population-level data constrains the scope for reweighting responses. Results may not generalise to all GB operators active in the EU or Schengen area.
- Timing and anticipatory change: some operators may have already started adapting in anticipation of the new system. Results may not represent a true 'baseline' for future analysis.
- Self-report and recall bias: misreporting, especially when recalling past behaviours, and inconsistent interpretation of terms may affect estimates of monitoring the 90/180 rule or EES awareness.
- Small subgroups and statistical precision: some sub-samples, especially for passenger operators, may be too small for robust percentage estimates. Where suitable, results will report margins of error.

Organisations that had received multiple invitations to complete the survey and had requested the survey link but had not yet completed it were provided with an incentive payment of £10 for completing it. A discussion of biases associated with incentives is presented under Qualitative Interviews.

3.3.2 Qualitative interviews

The research team coded each interview using a two-level thematic analysis approach, grouping codes (see Annex D4). The thematic analysis approach applied to this research was pragmatic and focused on identifying themes that relate specifically to the predefined research questions outlined in the topic guide, rather than deriving themes more generally from the interview outputs. Thematic analysis is a widely used method for analysis of qualitative data, and benefits from being flexible in terms of the extent to which analysis is grounded in theory or more inductive forms of analysis. The purpose of thematic analysis is to organise data and analyse it through grouping meanings into codes and themes whilst maintaining nuance, detail, and complexity of the dataset and subsequent analysis.[8] Further detail on how thematic analysis was conducted for this research can be found in Appendix H.

As with any qualitative research method, interviews entail caveats and limitations. These include the following:

- Qualitative interview participants were recruited through non-probability sampling, based on their companies being registered as holding an SIOL and the companies still being in business. Research using non-probability sampling can be at risk of self-selection or volunteer bias, as participants who volunteer to take part in an interview may be more likely to have strong opinions or different characteristics compared to the wider population of goods and passenger operators holding a SIOL. The sample is not expected to be representative of all operators.

- Only representatives of companies still in business were interviewed, and it is possible that some companies have ceased operations in recent years as a result of the 90/180 rule or the upcoming implementation of EES. These operators' opinions and perceptions may differ from those of participants in this research, and their views are not captured here.

- Cognitive testing and in-depth interview participants were provided with an incentive payment: £100 for cognitive testing participants, and £75 for in-depth interview participants. Providing research participants with incentives can introduce bias into the views reported, as the incentive may attract participants who are motivated by the reward and less interested in the research topic. Additionally, low-income individuals may be more motivated to participate in the research than those from higher-income levels. However, DfT and the research team, in consultation with DfT's Ethics Committee, agreed that the benefits of providing incentives outweighed the potential negatives, given the size of the desired sample, the busy nature of the industry and potential participants, and the need to thank participants for taking the time to participate.

[8] Braun, V. and Clarke, V. (2006). Using thematic analysis in psychology. *Qualitative research in psychology,* 3(2), pp. 77-101.

- The findings reported are views and opinions and not necessarily factual. The information gathered during interviews is likely, at least to some extent, to be based on subjective perceptions.

Qualitative research aims to gain depth of understanding, rather than breadth. While the research included a large qualitative sample, it does not provide a general overview of the scope of opinions and perceptions within the industry, as has been gained from other evidence sources.

Thematic analysis can involve issues with researcher bias due to subjectivity in interpretation and analysis of results, as well as inconsistent findings if the analysis were conducted by another researcher. To reduce bias in this research, a 3-person team of researchers conducted the qualitative data collection and analysis, and DfT provided quality assurance of codes and themes. Having multiple qualitative researchers helped reduce the impact of any individual researcher's bias on the analysis, and weekly meetings among the qualitative research team members ensured that discussions could be held to ensure consistency in the interpretation of findings.

4 Study findings

This section presents the main findings from the study, drawing on both the operator survey and qualitative interviews.

The survey provides structured, comparable data across a large number of SIOL-holding operators but is indicative rather than fully representative of the population. The interviews offer richer detail on how operators think and behave, but reflect the views of a smaller number of participants. Throughout, we use the survey to describe the scale and pattern of effects, whereas the interviews provide operator perspectives as to why these patterns arise. We highlight where the two sources align or diverge.

Findings should also be interpreted in the wider context of recent changes affecting UK road transport. These include the UK's exit from the EU single market and customs union, new border regulatory requirements, and broader cost pressures (such as higher wages, insurance and fuel costs). The survey and interviews were carried out in September and October 2025, shortly before and just after the formal start of EES, so they capture views at a time of ongoing adjustment.

Overall, the findings suggest that direct exposure to EES and the 90/180 rule is concentrated among a minority of operators, but that the implications could be significant for those that rely on regular mainland EU and Schengen travel. The findings are presented in the following sub-sections:

- Exposure to EU and Schengen travel
- Awareness of the 90/180 Schengen rule and EES
- Preparedness for EES implementation
- Impact of the 90/180 rule and expected impact of EES
- Wider challenges

4.1 Exposure to EU and Schengen travel

Survey evidence suggests that only a minority of SIOL-holding operators ran services that require cross-border travel between the UK and the mainland EU or the Schengen area. This international activity was found to be more common among larger goods operators who reported a higher frequency of EU or Schengen area travel than passenger operators.

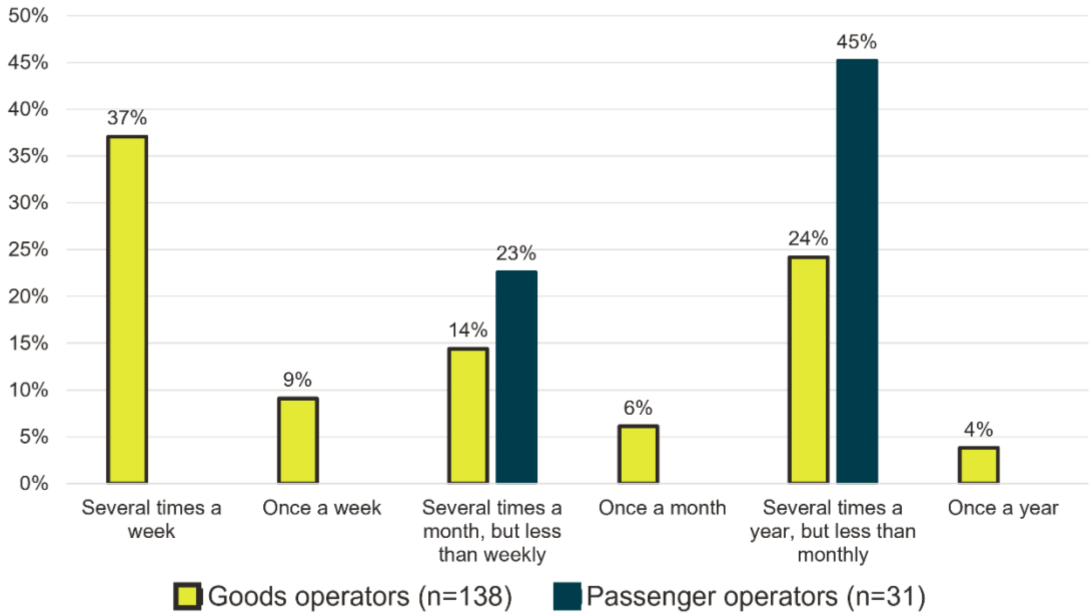
Less than 40% of all surveyed operators reported running services via the mainland EU or Schengen area countries (38% of goods operators and 44% of passenger operators). Many of the operators that do travel to the EU/Schengen do so infrequently. Just 24% of SIOL-holding goods operators and 17% of SIOL-holding passenger operators reported making trips to at least one mainland EU or Schengen area country on a monthly basis.

4.1.1 Frequency of travel to mainland EU or Schengen area

Of the 435 survey responses, just 169 (39%) reported providing services that required cross-border travel between the UK and mainland EU or the Schengen area. By operator type, this included 138 (38%) of goods and 31 (44%) of passenger operators.

Many operators that do travel to the EU/Schengen area do so infrequently, meaning their drivers are unlikely to breach the 90-day limit. When asked how often operators travelled to or through EU/Schengen destinations, 46% of goods operators reported travel to at least one mainland EU or Schengen area country on a weekly basis. In comparison, the majority of passenger operators (65%) reported travelling to the Schengen area or the EU once a month or less, with just 9% travelling at least once a week. These breakdowns are presented in Figure 5.

Figure 5 Frequency of travel to the EU or Schengen area



Source: Frontier Economics

Note: Operators are classified by the most frequent travel pattern they reported for any EU or Schengen area destination. For example, if an operator reported at least one destination as 'once a week', they are counted in the 'once a week' category even if other destinations were less frequent.
Based on the question: "How often does your organisation travel to and through each of the following countries using SIOL vehicles?"
Sample includes passenger and goods operators that provide services requiring cross-border travel between the UK and mainland EU or the Schengen area.
Totals may not sum to 100% due to rounding differences.
Subgroups that relate to less than four responses have been suppressed to reduce the risk of identifying individual respondents, including "Don't know" responses.

This measure should be interpreted with care, as it is based on the most frequent destination reported by each operator. As a result, it is more likely to understate than overstate operators' overall exposure to cross-border travel.

Operators that report travelling to the EU or Schengen area less than monthly are unlikely to have drivers exceeding the 90/180 rule. Using monthly travel as a conservative cut-off for exposure to the 90/180 rule, 88 goods operators and 12 passenger operators surveyed were identified as potentially at risk of having drivers exceed the 90/180 rule. This is equivalent to 24% of SIOL-holding goods operators and 17% of SIOL-holding passenger operators.

Seasonality of travel

These results should be interpreted with care. The survey question asked about the frequency in any one-year period, but travel is unlikely to be consistent across the whole year. The presence of seasonal differences may mean operators face greater risk of exceeding the 90/180 rule during specific times of the year. This exposure may be overlooked in the survey results.

Passenger operators providing coach services indicated in qualitative interviews that the frequency of their journeys into the mainland EU and the Schengen area varied throughout the year. Operators referenced making more regular trips during school holidays, particularly around Christmas and Easter, reflecting the high seasonality of passenger operations.

Goods operators are also expected to experience seasonality, with a higher frequency of journeys to the EU or Schengen area before the Christmas period. Seasonal differences depend on the type of goods transported, according to the operator interviews. Peak seasons were reported during the Christmas period and in summer months for certain food and alcohol products. Similarly, some also mentioned seasonality for the transport of specialised goods such as horses, with increased demand typically during the summer months.

Characteristics of operators that travel more frequently

For goods operators, running services in the EU or Schengen area is more concentrated among larger firms. Around 30% of surveyed goods operators with up to five vehicles in continuous use reported operating these services. This rises to over 50% among goods operators with more than 20 vehicles. This relationship is not observed for passenger operators.

Due to the high variety of goods transported, the frequency of mixed loads (groupage) and the relatively small sample of operators that travel to the mainland EU or Schengen, it has not been possible to assess whether some goods are more exposed to the new rules than others. However, a few operators interviewed were responsible for transporting perishable goods and reported being particularly concerned about the additional delays that the new system may cause at border crossings.

4.1.2 Driver nationality

As EU nationals are not subject to the 90/180 rule, greater reliance on UK and other third-country nationals for international trips increases the likelihood of exposure to the 90/180 rule.

Both goods and passenger operators that responded to the survey reported relying heavily on UK nationals. Goods operators that run services to mainland EU or the Schengen area reported that 85% of their drivers were UK nationals, on average. Passenger operators that run services to the EU/Schengen reported even higher reliance with an average 96% of their drivers with UK nationality.[9] These figures are only marginally smaller for goods and passenger operators that report travelling to at least one EU or Schengen country at least once a month.

This high reliance on UK nationals suggests that many of the operators that travel frequently to the EU may have drivers that currently overstay their 90 days in the EU. Once EES is fully introduced, these operators may need to make adjustments to avoid difficulties at the border and potential fines.

> *"There's a certain amount of planning that goes on, and previously we haven't had to take into account the number of days drivers have been overseas. We don't have enough drivers to fulfil all the jobs and if one delivery goes wrong or a driver calls in sick or is unable to do something, who are you going to choose to do that work?" - Goods operator with more than 20 drivers, frequently travels to mainland EU or Schengen area*

4.2 Awareness of the 90/180 Schengen rule and EES

The evidence suggests that headline awareness of EES is high, especially among EU-facing operators. However, detailed understanding of processes and implications remains uneven, and many operators would welcome clearer guidance from official sources.

4.2.1 Awareness of the 90/180 Schengen rule

Overall, awareness of the 90/180 rule is high across all surveyed operators, including those who do not run services to the EU or Schengen area. Among all operators surveyed, 84% confirmed they were 'somewhat' or 'fully' aware of the rule, rising to 96% among operators that report running services to the EU or Schengen area. This is consistent across the survey and interview findings.

In qualitative interviews, most operators demonstrated a good level of understanding of the rule. However, some operators were less certain about whether leisure days counted towards

[9] Due to missing or invalid responses, these statistics are based on the responses of 130 goods operators and 31 passenger operators.

the 90/180 rule. Others were unsure of the practicalities of the rule, such as when a 'day' began and was counted, or that the 180 days functioned on a rolling basis.

4.2.2 Awareness of EES implementation

Table 3 shows that awareness was highest among operators running frequent services to the mainland EU or the Schengen area. Around 92% of both goods and passenger operators that operate a high frequency of cross-border services (at least monthly) reported being 'fully' or 'somewhat' aware of EES. With the majority (65%) reporting that they were fully aware. This indicates a correlation between running international services and greater awareness of the 90/180 rule.

Table 3 Operator awareness of the EU's EES

	No EU or Schengen travel	Low frequency of EU or Schengen travel	High frequency of EU or Schengen travel
Fully aware	63 (27%)	19 (33%)	65 (66%)
Somewhat aware	98 (42%)	33 (58%)	27 (28%)
Not at all aware	74 (31%)	5 (9%)	6 (6%)
Total	**235**	**57**	**98**

Source: Frontier Economics

Note: Rounding means percentages may not always sum to 100%.
High frequency is associated with operators that report travelling to at least one EU or Schengen area country at least once a month.
Subgroups that represent fewer than four responses have been suppressed to reduce the risk of identifying individual respondents, including "Don't know" responses.

A similar pattern was expressed in the operator interviews. Participants whose organisations travelled regularly into the mainland EU and Schengen area had a significant understanding of EES, its implementation, and its practical effects on travel to and from the mainland EU and Schengen area.

The majority of operators interviewed stated they had known about the implementation of EES for at least six months, with many aware for over a year. Several of these participants noted that they expected (and had been informed) that the system would be operational in 2024, but that this implementation had been delayed.

Differences by operator type and interview timing

Both goods and passenger operators displayed equally high levels of awareness of EES. Among operators that run services to the mainland EU or Schengen area, 92% of goods operators and 93% of passenger operators reported being 'fully' or 'somewhat' aware of EES implementation. Survey evidence also finds no difference in awareness by operator size.

The general level of understanding across participants was highest among those interviewed immediately before and after the introduction of EES on 12 October 2025, following widespread media coverage of the new system. Others interviewed a few weeks prior had very little awareness of EES implementation. These participants were particularly unsure of the practicalities of the new system, how it would function, and what impact it might have when travelling to and from the mainland EU and Schengen area.

> *"I don't have much knowledge about this new system. I heard about it, but I didn't know exactly what it is referring to."* – Goods operator with two to five drivers, rarely travels to mainland EU or Schengen area
>
> *"I was aware that they were coming in but wasn't entirely sure what the actual physical changes or processes are."* – Goods operator with one driver, rarely travels to mainland EU or Schengen area
>
> *"Since day one of them actually announcing it, because I'm very heavily involved at the CPT and the CPT are really good at putting newsletters out and bulletins when things are happening that will eventually affect our industry."* – Passenger operator with six to ten drivers, frequently travels to mainland EU or Schengen area

Sources of information

Participants referred to many different sources of information for their understanding of EES. Some of the most frequently referenced sources included:

- Industry publications and associations, especially the Road Haulage Association (RHA) and Confederation for Passenger Transport (CPT). Several participants referred to campaigns launched by both organisations calling for exemptions or visas for transport drivers. For those who believed they would not be directly affected by the changes, these publications and campaigns were also important in developing their understanding of the potential impacts across the industry.
- Online sources, such as social media and industry forums, where drivers and others in the sector reportedly discuss policy, regulatory and practical changes.
- The wider media, which participants suggested had begun to report on the introduction of EES immediately prior to implementation on 12 October 2025.

> *"We've got all our information through the RHA. We're a member of the RHA. If you're not a member of the RHA all of this will pass you by, so I think there should be some onus on the government to say 'this is what we've agreed' and send it out to anybody that's got an operating licence. Just as a basic checklist to make sure we can all comply with it rather*

than have the nasty surprise at the border." – Goods operator with two to five drivers, frequently travels to mainland EU or Schengen area

"I think there could have been more publicity or more information, whether it be adverts on TV, because there's been no information about it really, apart from the odd thing you hear on the news or the odd email I've had." – Goods operator with one driver, rarely travels to mainland EU or Schengen area

Several respondents felt they would appreciate more informational materials from DfT to help raise awareness and understanding of EES. However, as EES is an EU policy the EU has been leading on overall communications to the public and operators. The UK Government has supported this messaging for the UK public, with a wide range of communications to coincide with the beginning of the rollout period (12 October 2025).

DfT launched its EES communication campaign on 6 September 2025, which included several communication activities to ensure information about EES implementation was cascaded to transport industry stakeholders. The DfT industry toolkit was shared with over 250 transport and travel stakeholders (including associations, operators, and industry bodies) for use on their platforms and in their customer communications. The toolkit included links to online communication assets which organisations could use to communicate information about EES to their passengers.

A Transport Industry Communications Group was also set up by DfT. This Group provided industry stakeholders with updates relating to EES implementation and the opportunity to ask questions to officials. Answers to questions were circulated by email to all attendees. Additionally, DfT and CO jointly held two 'Train the Trainer' webinar sessions (on 24 July 2025 and 1 October 2025) with customer-facing staff in the transport industry. These sessions supported industry staff in understanding the requirements of EES and how to respond to various customer questions.

4.3 Preparedness for EES implementation

Results suggest that, so far, operators have not reshaped recruitment, route assignment or monitoring to manage exposure to the 90/180 rule. Although some operators report making some operational changes in preparation, the majority of both passenger and goods operators that run EU or Schengen services report no changes.

4.3.1 Monitoring of driver days spent in the EU and Schengen area

Survey and interview evidence suggest a mixed picture on monitoring. Operators appear more likely to report that they monitor drivers' workdays in mainland EU or the Schengen area in the survey than is reflected in the qualitative findings. Interviews suggest that monitoring was often light, patchy, and focused only on work, rather than leisure. Where monitoring is not carried out, operators usually see it as unnecessary because of low volumes of EU work or because they expect limited enforcement of the 90/180 rule.

Where monitoring is and is not done

Responses to the operators' survey suggest that monitoring of driver workdays spent in the EU and Schengen area is relatively high. As shown in Table 4, the survey finds that 70% of goods operators and 81% of passenger operators that run services in the EU or Schengen area either 'agree' or 'strongly agree' with the statement 'My organisation monitors the number of days its drivers spend in the mainland EU or Schengen area for work'. However, when asking a similar question about the monitoring of leisure days, these rates decrease to 43% of goods operators and 55% of passenger operators.

Table 4 Reports of monitoring by operator type

	Number of goods operators	Number of passenger operators
Monitors workdays	92 (70%)	25 (81%)
Monitors leisure days	56 (43%)	17 (55%)
Monitors both	48 (38%)	16 (52%)
Total	**138**	**31**

Source: Frontier Economics

Note: Sample includes operators that run services to the mainland EU or Schengen area and excludes those that responded "Don't know" to the monitoring questions.
Table counts the number of operators responding that they (strongly) agree with the statement "My organisation monitors the number of days its drivers spend in the mainland EU or Schengen Area for work/leisure". 'Don't know' responses are excluded.

Interview findings contradict the survey results by suggesting that monitoring of days is limited for both goods and passenger operators. This discrepancy with the survey results could reflect differences in understanding what monitoring is required to abide by the 90/180 rule. Some of the affirmative responses in the survey may represent an understanding of a lighter form of monitoring (for example, through standard shift monitoring).

The survey results provide further evidence for this, as monitoring does not appear correlated with exposure to the 90/180 rule. Goods operators that run frequent services (at least once a month) to the mainland EU or Schengen area report lower rates of monitoring workdays in the EU than those with less frequent services. However, this difference is not statistically significant.

Whereas interview evidence found operators with low volumes of EU and Schengen area work typically saw monitoring as unnecessary due to their low risk of exceeding the 90/180 rule. These operators also expressed no intention to monitor driver days in the future unless their travel frequency to these countries increased.

> *"If the work becomes more regular, then obviously we would start keeping an eye on it … We got a rota with all the drivers, hours and times on it."* – Goods operator with more than 20 drivers, frequently travels to mainland EU or Schengen area

Larger organisations, those that travelled into Europe more frequently, or those that employed transport managers and planners, were more likely to consistently monitor driver days, although some still chose not to. Their main reasons were a lack of 90/180 rule enforcement at borders and uncertainty about whether EES would be fully implemented. A few operators hoped for an industry-specific exemption.

> *"Ultimately, it's their [drivers'] responsibility to count their own days as well as my responsibility as well. Everybody can't hold me accountable, the drivers are doing it themselves and that's what they want to do. So no, I'm not going to change anything until we have a problem."* – Goods operator with six to ten drivers, frequently travels to mainland EU or Schengen area
>
> *"We're going to have to start probably in January saying, 'right every sixth week you're [the driver] going to have to work in the UK to get your numbers down' because we can't let it get to 90, can we?"* – Goods operator with more than 20 drivers, frequently travels to mainland EU or Schengen area

Several goods and passenger operators reported beginning to monitor or preparing to monitor the number of days drivers had spent in mainland EU or Schengen area countries once EES had been implemented. Some participants expected this to affect drivers' ability to vacation in mainland EU or Schengen countries. Some operators were already planning to limit the number of leisure days drivers can spend in the EU, to preserve room within the 90-day limit for work trips. However, they were worried that this would be unpopular and could make recruitment and retention harder.

> *"We've got to be careful that the drivers and the holidays don't interfere with it … So that will be an issue because obviously if they do take a summer holiday that's 14 out of their days … So that will have an impact and that's something we're going to have to look at."* – Passenger operator with six to ten drivers, frequently travels to mainland EU or Schengen area
>
> *"I've told them that they're going to have to plan it … I don't think they're going to be able to do last-minute holidays going like 'I'm off for this week, the coach isn't away this week, so I'll book a week's holiday in Spain'. I don't think they're going to be able to do that."* – Passenger operator with two to five drivers, frequently travels to mainland EU or Schengen area

How monitoring is carried out

A consistent finding across the interviews and survey evidence is that, where monitoring existed, it was more likely to relate to the monitoring of workdays than of leisure days in the EU. In the interviews, operators generally reported tracking leisure days only if there was already a system in place to record work absences, whether formal or informal.

Approaches to monitoring driver days in mainland EU and Schengen area countries varied, according to the interview findings. Some operators reported relying on drivers monitoring their time themselves, while others mentioned that they had a more formalised process, typically using Excel spreadsheets. Less common methods included mobile apps, tachograph data, invoice checks, and specialised software.

> *"We rely on them to do self-monitoring when they're out there … We always make sure we time the journey, we generally have a schedule for the journey. We can advise the drivers on their hours, how long we expect them to be out there, but you can't always guarantee … German roadworks are legendary … We generally leave them to their own devices."* – Passenger operator with an unknown number of drivers, frequently travels to mainland EU or Schengen area

The majority of individuals interviewed reported minimal impact from the monitoring process, viewing it as only a small increase in administrative time. Some mentioned this may become more challenging with stricter monitoring processes after EES implementation.

Uncertainty around monitoring best practice

Some interview participants expressed some confusion about how to count work and leisure days in the mainland EU and Schengen area countries. Specifically, whether to begin counting from 'day 0' or 'day 1', and whether to count from when the driver or passengers pass the border on the UK side or on the EU side.

A few interviewed operators mentioned being concerned about monitoring leisure days as asking drivers about their holiday destination felt invasive.

> *"I just didn't even think about it, to be honest … Thinking about their rotation at the time, [even] if they [took annual leave] all at once they would never hit the 90 days anyway."* – Goods operator with 11 to 20 drivers, never or very rarely travels to mainland EU or Schengen area

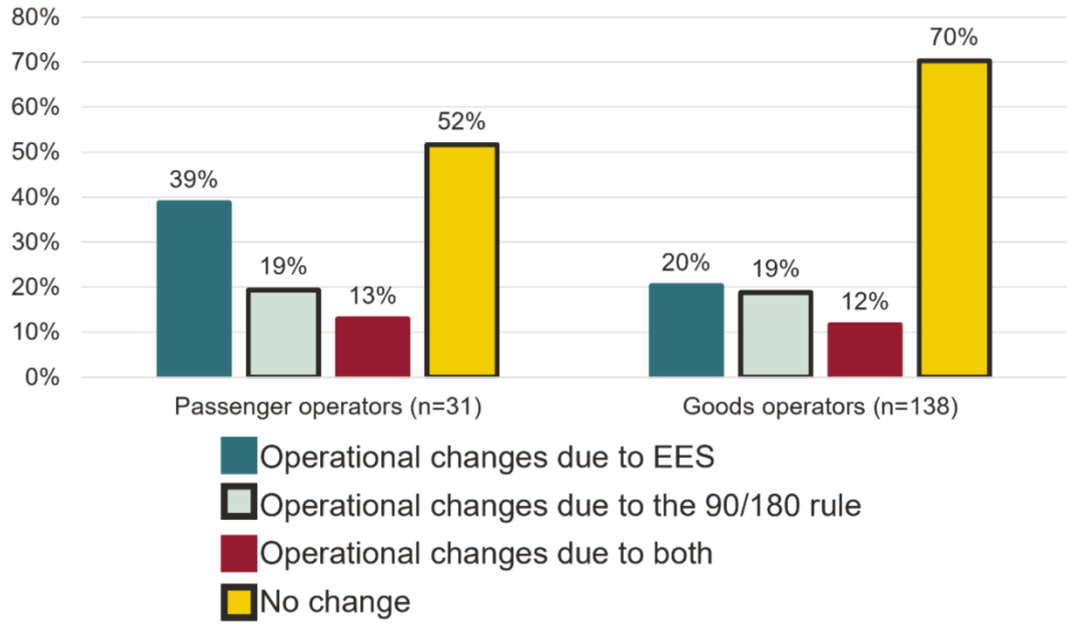
Overall, the qualitative evidence suggests that many operators see monitoring as low-cost when it is done, but do not view it as essential. Decisions not to monitor appear to be driven more by perceptions of low risk or weak enforcement than by the cost of monitoring. However, current systems, many of which do not seem to account for leisure days, may fail to capture drivers' full exposure to the 90/180 rule.

4.3.2 Actions and adaptations made in preparation for EES

Findings from interviews highlighted differences between goods and passenger operators in their readiness for the introduction of EES. Passenger operators generally reported more proactive scenario planning and practical preparations to minimise disruption, such as adjusting arrival times at ports and developing information materials. Goods operators mentioned having undertaken little preparation and often described operational constraints or hopes for an intervention from the UK government to support the industry.

These differences align with the survey findings, presented in Figure 6. When asked whether their organisation had made any changes to operations to date due to the EU's EES or 90/180 rule, 70% of goods operators and 52% of passenger operators who reported running services to the mainland EU or Schengen area reported making no changes to their operations.

Figure 6 Changes to operations to date due to 90/180 and EES



Source: Frontier Economics

Note: Sample includes operators that conduct operations in the mainland EU or the Schengen area.
"Has your organisation made any changes to your operations to date, due to the EU's Entry/Exit System (EES), or 90/180 Schengen rule?"

Preparations for EES mentioned by passenger operators in the qualitative interviews included:

- **Arriving at ports with extra time**: following advice from ports (especially the Port of Dover) to compensate for possible delays and queues when registering at the border
- **Having an additional feeder driver**: if additional delays occurred, drivers' hours would not be exceeded when waiting at border controls. However, this would incur additional staffing costs, which passenger operators explained would be carried over to consumers
- **Producing information sheets for passengers**: based on information provided by DfT, to help avoid confusion among passengers

No participants described plans to partner with EU- or Schengen area-based operators to deliver their services.

Some passenger operators requested that standardised information be provided to operators to distribute to passengers, and that passengers should be able to pre-register before reaching ports to minimise queues.

> *"We'll just allow more time at the port, which makes sure they've got more time to go through that process … Currently we plan to get to Dover between an hour and a half to two hours before the sailing, we'd probably add another three quarters of an hour to an hour, just to make sure they've got time for everybody to get off, have their fingerprint taken and photo taken. It will just be adding time to the journey."* – Passenger operator with six to ten drivers, frequently travels to mainland EU or Schengen area

> *"There might be times where we might organise trips at different times, so we avoid the peak, move to nighttime crossings because they'd be emptier and quieter and more likely to get on time … There's not much we can do to prepare other than just let the customer know it's going to happen."* – Passenger operator with six to ten drivers, frequently travels to mainland EU or Schengen area

In general, interviewed goods operators reported less planning and fewer concrete changes. Many said they had not adapted and did not intend to until enforcement affects them. Several described the haulage industry as reactive rather than proactive and expected that changes would only come once drivers reached the 90-day limit.

Numerous participants said they expected (or hoped) that the government would make changes alongside the EU to mitigate the impacts of EES on GB goods and coach operators. The suggested options included asking the EU to introduce a visa or exemption to the 90/180 rule for transport operators. Because of this expectation, many had reportedly made no plans to amend operations to adapt, and most expressed feeling let down that EES was to be implemented without an exemption in place.

> *"We're completely reliant on the government negotiating something on behalf of the haulage industry."* – Goods operator with more than 20 drivers, frequently travels to mainland EU or Schengen area

> *"It's not something that we've thought about at the moment, I guess. When you will be forced into it, then I guess we will have to rethink and work out a strategy. No changes planned at the moment."* – Goods operator with 11 to 20 drivers, rarely travels to mainland EU or Schengen area

> *"We're aware of the rules and we're managing it in our way at the moment. So, until we see another change in the rules or we find we may be getting close to having a conflict with them, we will just operate as we are."* – Goods operator with two to five drivers, frequently travels to mainland EU or Schengen area

Some smaller operators interviewed (in both sectors) were considering scaling back EU and Schengen work or focusing mainly on UK operations to stay compliant. Others felt they could not adjust because of long-term contracts or the nature of their services. A small number of operators were exploring more radical options, such as moving part or all of their business into an EU or Schengen country or relying more on staff with EU residence rights.

> *"The only solution we've got is to move the entire company to Europe … I've got solicitors looking at it at the moment … It's all going to go wrong in February, there'll be sudden uproar about it … and then they'll [the UK government] probably sort it out. But I'm not relying on that, because I'm not going to sit here on the off chance that they might … sort it out."* – Goods operator with six to ten drivers, frequently travels to mainland EU or Schengen area

Interviewed operators did not refer to making any changes in either recruitment or route assignment for domestic or international work. Instead, operators prioritise skills, experience and driver preferences, although some are increasingly aware of the additional risks and burdens associated with compliance in mainland EU and Schengen area countries.

Interviewed operators did not report selecting drivers for international work based on nationality. Only a small number mentioned seeking staff with the right to work and live in the EU or the Schengen area.

> *"Oh yes, 100%. Because if they don't [have the right to work in the EU] it makes my work much more difficult."* – Goods operator with two to five drivers, frequently travels to mainland EU or Schengen area

Overall, the qualitative findings suggest that operators had not systematically adapted their hiring model in response to EES or the 90/180 rule.

4.4 Impact of the 90/180 Schengen rule and expected impact of EES

Awareness of the 90/180 rule is generally high across all operators in survey and interview analysis. As would be expected, perceptions related to the negative effects of the 90/180 rule and EES are concentrated among operators that run services to the mainland EU and Schengen area. Therefore, the following section focuses on those operating cross-border services.

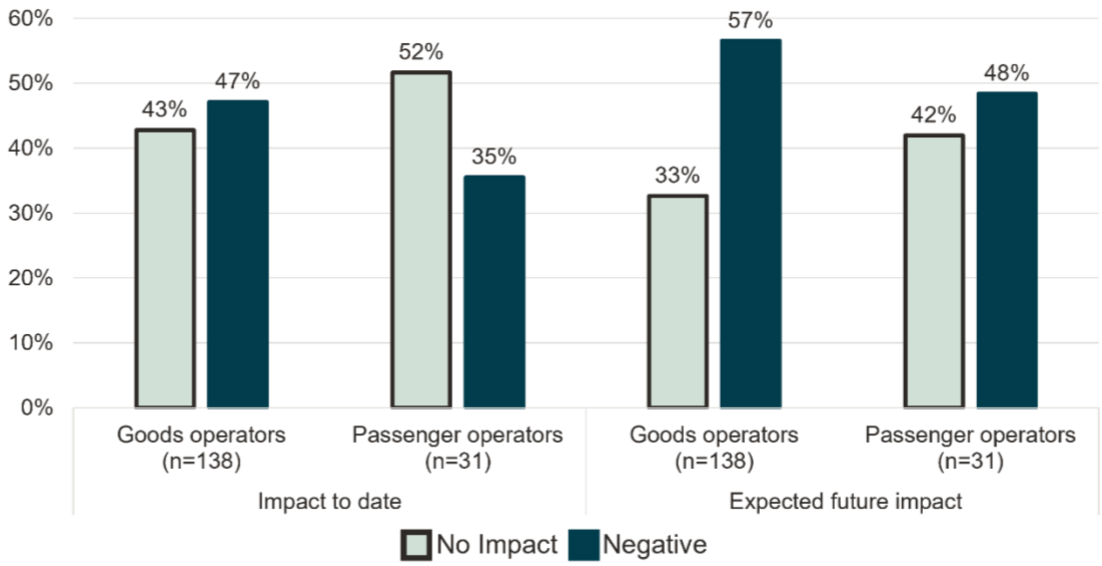
4.4.1 Impacts felt since EU exit and the introduction of the 90/180 rule

Evidence on whether and to what extent the introduction of the 90/180 rule has affected operators has been mixed. Negative effects are concentrated among operators that already run services into the mainland EU or the Schengen area.

Impacts to date and in the future

Among operators serving the mainland EU or the Schengen area that responded to the operator survey, a large proportion reported no impact from the 90/180 rule to date. However, expectations of negative impacts increased when asking operators about expected future impacts of the 90/180. Figure 7 shows that 47% of goods operators that run EU/Schengen services and 35% of passenger operators that run EU/Schengen services reported negative impacts from the 90/180 rule to date. Whereas 57% and 48% reported expecting negative impacts in the future, respectively.

Figure 7 Current and expected future impact perceptions of the 90/180 rule



Source: Frontier Economics

Note: Sample includes operators that conduct operations in the mainland EU or the Schengen area.
"What has been the overall impact, if any, of the 90/180 rule on your organisation to date?" Responses of 'somewhat negative' or 'very negative'.
"What impact if any, do you anticipate there being on your organisation in the future due to the 90/180 rule?" Responses of 'somewhat negative' or 'very negative'.
Subgroups that relate to less than four responses have been suppressed to reduce the risk of identifying individual respondents, including "Don't know" responses.

Similarly, almost all interview participants reported that the rule had not yet impacted their business and that they had not been required to adapt their operations to comply with it. These included:

- Operators who rarely or never operate in the mainland EU or the Schengen area, who were effectively compliant as they did not exceed the 90-day limit.
- Operators that regularly operate in the mainland EU and the Schengen area. Many accepted that some drivers have exceeded the 90-day limit, sometimes knowingly. They have not adapted their operations, as they see the 90/180 rule as unenforced in practice.

  "It's almost like it didn't happen in January 2021. I don't think we've ever had anybody challenge us to say 'I think your driver has overstayed' … It's a 96-page passport full of stamps all over the place." – Goods operator with more than 20 drivers, frequently travels to mainland EU or Schengen area

All interview participants who undertook regular journeys into the mainland EU and the Schengen area said they were concerned by the implementation of EES. They expected it to lead to stricter enforcement of the 90/180 rule and more frequent sanctions for noncompliance. Although they reported few effects of the rule to date, operators expected a far greater impact in the future.

Interviewed operators reported that they had not been penalised for exceeding the 90-day limit. A few participants reported that checks had increased in recent months at some ports and in some countries, in anticipation of the implementation of EES.

> *"We're only getting away with it because it's not electronic. If you have a look at one of our driver's passports, it's literally an 80-page passport full of stamps. There're hundreds of stamps in there and they cannot … count all your days. It's physically not possible. You'd be there all day. So that's why it's not being enforced … That's why no-one's bothered with it."* – Goods operator with six to ten drivers, frequently travels to mainland EU or Schengen area

Changes in the volume of UK and EU work

Interviews with goods operators highlighted large reductions in work opportunities in mainland EU and Schengen area countries, mitigated, at least in part, by an increase in UK work. This resulted in some operators rarely or never transporting goods into mainland EU or Schengen area countries, instead focusing on the UK internal market.

Smaller businesses, whose work is generally subcontracted on an ad hoc basis, were the most likely to report being impacted.

> *"Before Brexit there was plenty of work. After Brexit, it's a little bit quiet, not enough work for everybody. The bigger companies like DHL take all the contracts. So, for the smaller ones there is not enough work."* – Goods operator with six to ten drivers, never or very rarely travels to mainland EU or Schengen area

> *"We cannot afford to branch out and open up a European branch … So we're basically doggy paddling in a swimming pool and trying not to drown."* – Goods operator with six to ten drivers, frequently travels to mainland EU or Schengen area

Some passenger transport operators also reported recent challenges with the availability of work, as the high costs of trips have reduced demand for international services. Cost increases could stem from general cost pressures, such as fuel costs. However, there had been no corresponding increase in demand for domestic trips.

4.4.2 Expected impacts from EES implementation

Operators that run services to the mainland EU or the Schengen area are highly likely to report expecting negative impacts on their business from EES implementation. For those operators, interview evidence suggests concerns about EES are closely tied to worries about stricter enforcement of the 90/180 rule and the viability of their existing operating models.

Expected impacts from EES implementation

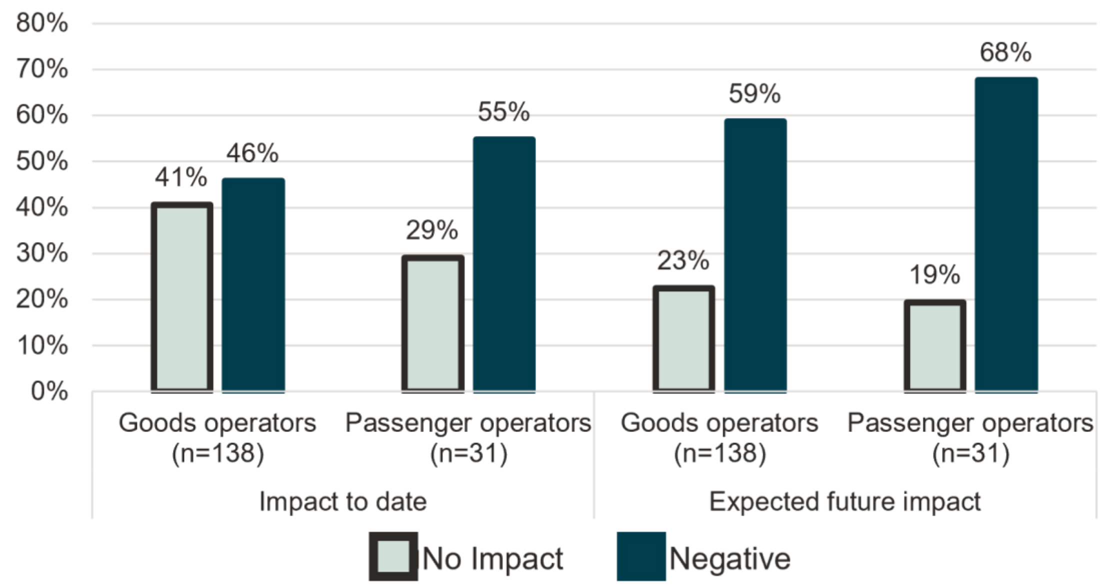
Figure 8 shows that 46% of goods operators and 55% of passenger operators that operate EU or Schengen area services report having experienced 'very' or 'somewhat' negative impacts from EES to date. When asked about expected future impacts, 59% of goods operators and 68% of passenger operators reported expecting 'very' or 'somewhat' negative impacts in the future.

As expected, these rates are much higher than the expected negative impacts for operators who do not work in the mainland EU or Schengen area. Still, 15% of goods and 31% of passenger operators anticipate a negative impact.

A few qualitative interview participants who reported never travelling abroad mentioned potential negative indirect impacts of EES on their supply chains, such as increased costs and delays when importing items manufactured in mainland EU or Schengen area.

> "*It could have an indirect impact because obviously our trucks are all European manufacturers and it is something to be aware of in terms of supply chains […] that if it's going to take longer or be more expensive to get […] certain parts moved over […]. If we need a part in short order, then the manufacturer will fly stuff in from Eindhoven over to the UK."*- Goods operator, with two to five drivers, never travels to mainland EU or Schengen area
>
> "*More UK work for UK hauliers, more hold up at docks. So when I get a trader now you have to wait for customs clearance for it, whereas pre-Brexit you could just go straight into the country. But that's not the case now*" – Goods operator with one driver, never travels to mainland EU or Schengen area

Figure 8 Current and expected future impact from EES implementation



Source: Frontier Economics

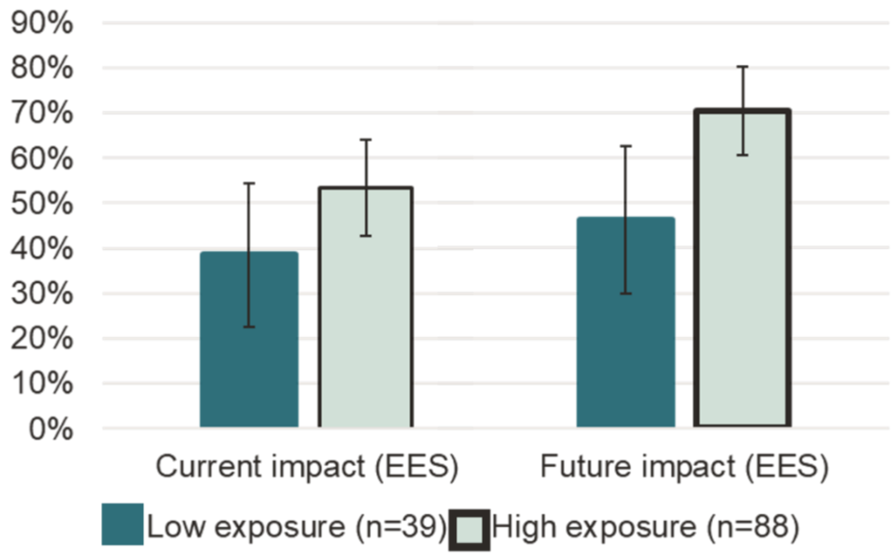
Note: Sample includes operators that conduct operations in the mainland EU or the Schengen area.
"What has been the overall impact, if any, of the EU's Entry/Exit System (EES) implementation on your organisation to date?"
"What impact if any, do you anticipate there being on your organisation in the future, as a result of the upcoming implementation of the EU's Entry/Exit system (EES)?"
Subgroups that relate to less than four responses have been suppressed to reduce the risk of identifying individual respondents, including "Don't know" responses.

Differences by frequency of travel and preparedness

Goods operators who report running more frequent operations (at least once a month) in the mainland EU or Schengen area are more likely to report expected future impacts as a result of the introduction of EES. As shown in Figure 9, 46% of goods operators that run EU/Schengen services at a low frequency (low exposure) report expecting negative impacts in the future, compared to 70% of those with high exposure. This difference is significant at the 1% level.

The same comparison is not possible for passenger operators due to the small size of the response sample that run international travel.

Figure 9 Expected impact of EES by frequency of EU/Schengen travel

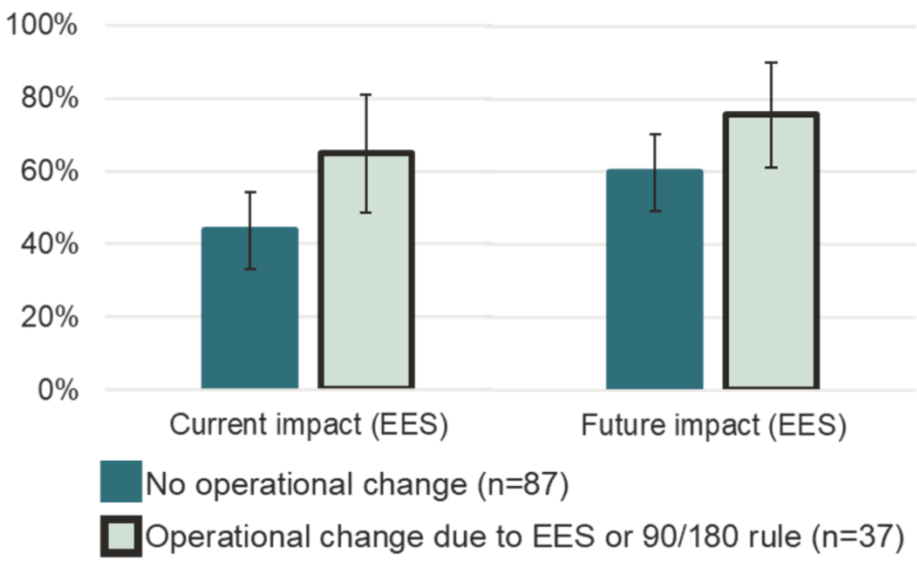


Source: Frontier Economics

Note: Sample includes goods operators that conduct operations in the mainland EU or the Schengen area.
"What has been the overall impact, if any, of the EU's Entry/Exit System (EES) implementation on your organisation to date?"
"What impact if any, do you anticipate there being on your organisation in the future, as a result of the upcoming implementation of the EU's Entry/Exit system (EES)?"

Goods operators that run services to the mainland EU or Schengen area report having already made operational changes as a result of either the Schengen rule or EES are more likely to report having already experienced impacts as a result of EES implementation. As shown in Figure 10, 63% of goods operators that have made operational changes report having already experienced negative impacts from EES, compared to 40% of those who have not made operational changes. This difference is significant at the 5% level. This relationship reduces and is no longer significant when asking about potential future impacts. The proportion reporting negative impacts increases for both groups, however, it increases faster for the group that has not made operational changes to date.

Figure 10 Expected impact of EES by operational changes



Source: Frontier Economics

Note: Sample includes goods operators that conduct operations in the mainland EU or the Schengen area. "What has been the overall impact, if any, of the EU's Entry/Exit System (EES) implementation on your organisation to date?" "What impact if any, do you anticipate there being on your organisation in the future, as a result of the upcoming implementation of the EU's Entry/Exit system (EES)?"

Practical impacts at the border

Some operators interviewed, especially passenger operators, anticipated that the EES implementation process would lead to delays from increased queues at border checkpoints. Others believed it could speed up border crossings by reducing human errors and wait times for passport stamps.

> *"I imagine when it's brought in initially, there's going to be queues at ferry ports and things while they put everybody through it. But once you're registered, it's just as simple as showing your passport again after that." – Goods operator with two to five drivers, occasional EU travel*

> *"We do have a few concerns around the time it's going to take in terms of getting fingerprints scanned, things like that … initially time to get through for a coach is expected to be up to three hours, which for us is a little bit alarming."* – Passenger operator with more than 20 drivers, rarely travels to mainland EU or Schengen area

> *"It's been fairly negative because it's going to lead to an increase in delays … The ferry companies have written to us all saying we need to get there an extra hour earlier … Tour*

> *operators don't really have that flexibility. So, it will either mean a breach in drivers' hours or … whoever it might be will miss out on an activity."* – Passenger operator with six to ten drivers, frequently travels to mainland EU or Schengen area

Passenger operators interviewed anticipated potential inconveniences for coach passengers, particularly older individuals and children travelling on school trips.

> *"The idea of having a passenger on board who, unbeknownst to them, has already exceeded their 90-day limit while on the trip … would be a hideous situation because that's going to cause significant delays amongst smaller operators if a vehicle is not back in the yard."* – Passenger operator with two to five drivers, never or very rarely travels to mainland EU or Schengen area

Goods operators interviewed reported that new customs checks and regulatory requirements introduced after the UK's departure from the EU have increased administrative workloads and waiting times at borders. When paperwork or certificates are missing or completed incorrectly, the operators mentioned that delays can extend to hours and days, negatively affecting companies' ability to fulfil future assignments. Customs issues were particularly prevalent for those transporting specialist goods (such as animals or household removals) and musicians travelling on tours, who face additional entry requirements.

> *"It's just silly, really silly, and sometimes there'd be a certificate missing or something and then we would just be held for days until we got the certificate. There'd be a problem, maybe a wrong number on a form … They'll hold us for days until that changed. They really are quite awkward and made our life very difficult."* – Goods operator with one driver, frequently travels to mainland EU or Schengen area

Passenger operators interviewed mentioned that additional passport and visa checks had led to queues at entry points to mainland EU and Schengen area countries, particularly during popular travel periods such as Easter and Christmas.

> *"Costs have risen exponentially; we've seen an increase in delays at the ports … Delays are the biggest issue, and they're caused more often than not in Calais trying to get back into the UK … I think the longest one was probably six to seven hours with no notice, nothing, no reasons."* – Passenger operator with six to ten drivers, frequently travels to mainland EU or Schengen area

Several goods and passenger operators interviewed indicated that their companies had built more leeway into schedules and amended driver rotations to accommodate the possibility of delays, adding to the costs of each journey.

Wider operational and business impacts

Interview participants saw EES and the 90/180 rule as tightly linked. They expected the new digital system to make it easier for border officials to record and monitor days in the Schengen area, and therefore to enforce the 90/180 limit more strictly.

Interviewed operators who travel frequently into the mainland EU or the Schengen area expected this stricter enforcement to have substantial operational and financial impacts. They anticipated needing to:

- employ more drivers to increase their ability to rotate staff and keep each driver within the 90-day limit
- reduce the frequency of trips into the mainland EU and the Schengen area
- shift towards a more UK-focused operating model

Some feared that these changes might make parts of their business, or in a few cases their whole company, unviable.

> *"There's a shortage of drivers in the UK anyway, so we can't necessarily replace them. The boss is talking about maybe having to completely shut certain parts of the business, which will mean redundancies and everything else. It's not a good time for the haulage industry."* – Goods operator with more than 20 drivers, frequently travels to the mainland EU or the Schengen area

Reported impacts were expected to be especially severe for specialist or niche services that depend on regular EU work, such as music tour coaches, pet and horse transport, or movement of technical equipment. These operators explained that there is limited or no equivalent UK-only work, so simply switching to domestic trips is not realistic.

These potential impacts were reported during interviews by both passenger and goods operators travelling to mainland EU and the Schengen area, and more frequently by medium- and large-sized operators, who suggested they were less able to reconfigure their operations to adapt to the new restrictions. However, many small operators still reported that they would be heavily impacted and commented that larger companies are better able to invest in additional drivers and operate simultaneously in both the UK and the mainland EU and Schengen area countries to mitigate the effects. Potential negative impacts were reported more frequently in interviews conducted just before and immediately after EES implementation.

> *"If it's not sorted out, I think it's going to bust us. It'll shut me down. It'll shut a lot of hauliers down … My boys have got families, bills, mortgages, car finances … There's not the experienced drivers out there to work for three months on, three months off. It's not there."* – Goods operator with six to ten drivers, frequently travels to mainland EU or Schengen area
>
> *"We can't do what everyone else is doing, and to be honest, we don't want to do what everyone else is doing. I don't want to put my guys out of work to employ someone else to do a job … they love doing. It's tough. We just don't know. This is the most worried we've been. We've been knowing it's coming but we've been hoping and praying that there was going to be some sort of exemption put in place."* – Passenger operator with six to ten drivers, frequently travels to mainland EU or Schengen area

Both goods and passenger operators raised concerns during interviews about competitiveness. They feared that EU- and Schengen-based operators, whose drivers may not be subject to the same 90/180 constraints for EU travel, would be better placed to take on cross-border work between the UK and mainland Europe. Several participants anticipated a shift in contracts away from GB hauliers and coach companies, with knock-on risks for UK supply chains and tourism.

> *"The haulage business will decline in the UK … and certainly those that employ UK drivers. It'll all be pulled by Eastern Europeans and Europeans. It's just playing into the hands of the EU and businesses like mine will struggle."* – Goods operator with more than 20 drivers, frequently travels to mainland EU or Schengen area

> *"That's the fear, I think British hauliers are worried that they're going to lose work to the European hauliers … I think there's a sort of doom and gloom in the UK haulage industry that the Europeans are going to steam in now and sort of pinch half the work that we're doing at the minute."* – Goods operator with more than 20 drivers, frequently travels to mainland EU or Schengen area

> *"I think you'll suddenly see a big impact either through UK companies having to employ EU companies to come and get their goods because they're not affected by the 90/180, or there'll be a lack of products on the shelves of supermarkets and supply chains for manufacturing will go down. It's going to have a massive detrimental effect."* – Goods operator with more than 20 drivers, frequently travels to mainland EU or Schengen area

4.5 The relevance of wider challenges

To contextualise findings specific to the 90/180 rule, the research also explored the wider effects on operators since the UK's exit from the EU during qualitative interviews and survey responses. Findings suggest that operators believe they face a wider set of post-EU exit pressures, into which the 90/180 rule is only now starting to affect. Driver availability is considered to be tighter, and recruitment to be harder. Some report decreased availability of EU-facing work, increased delays at borders, and rising operating costs.

Interviewees were asked to describe changes to their organisation and the wider industry over the past five years, covering the period between the UK's exit from the EU single market and customs union (31 December 2020) and the interview (September or October 2025). Frequently reported changes included:

- driver availability
- changes in the volume of UK and EU work
- delays linked to new border and customs processes
- increases in other operator costs

Many of these changes were attributed to the UK's departure from the EU, but others reflected wider economic conditions and sector-specific trends in the passenger transport and goods industries.

4.5.1 Driver recruitment and route allocation decisions

Interview evidence suggests that operators usually recruit and assign drivers based on practical needs rather than nationality, with skills, experience, preferences and availability playing the main role.

For international routes, operators reported in interviews that they value drivers who can manage border processes, customs paperwork and the demands of longer trips, while some drivers actively avoid this work because it is more stressful, disruptive and often less attractive than UK routes. This matters for the wider impacts of EES because any increase in border delays, administrative burden or time spent overseas could make EU and Schengen work less appealing and reduce operators' flexibility to use their existing workforce. In turn, operators may have less scope to rotate staff or allocate routes in the way they do now, which could create staffing pressures and make some services harder to run efficiently.

Ability, reliability and experience are most valued by operators

Interview evidence showed that drivers are primarily recruited based on ability, communication skills, and work ethic.

For operators who travel frequently to the mainland EU or the Schengen area, qualitative evidence suggests prior international driving experience is an advantage. Some interviewees noted that it is easier to run services with drivers who already understand border processes, ferry or tunnel procedures and driving conditions overseas.

Operators running less frequent services to the mainland EU and the Schengen area often reported, in interviews, employing drivers willing and able to undertake both international and domestic travel. The relatively small volume of EU or Schengen area trips makes them less exposed to 90/180 restrictions.

Qualitative evidence on route assignment suggested it was similarly driven by a mix of experience, preferences and availability.

Differences between driving in the UK and in the mainland EU or Schengen area, such as trip duration and complexity of international travel, mean driver preferences also impact role assignment, according to qualitative insight. For example, operators mentioned that some drivers are happy to take on longer trips that may mean working weekends, while others prefer shorter trips that allow them to be in the UK more regularly. Severe border delays, sometimes due to manual passport stamping or customs checks, increase drivers' reluctance to work outside the UK.

> *"One is doing the local ones because he wants to be home often … But the other guy he has his family back in Romania, so he doesn't mind going away for the whole week. So, it's a very easy decision."* – Goods operator with two to five drivers, frequently travels to mainland EU or Schengen area

"The others just basically won't go … They've got family, and it's a lot of stress. You've got to go to a customs site to get yourself signed through. It's driving on the wrong side of the road, for instance … They basically just don't really want that stress. So, they'd rather not do it." – Goods operator with two to five drivers, rarely travels to mainland EU or Schengen area

Other reasons, reported by operators, for drivers preferring not to drive into mainland EU or Schengen area countries included the general work culture, available facilities (such as road infrastructure and service stations for driver rest periods), and additional costs borne by the driver (such as regular passport renewals or responsibility for fines).

"We have one driver per vehicle, and that driver lives with the vehicle, stays with the vehicle. It's their home for the year." – Passenger operator with six to ten drivers, frequently travels to mainland EU or Schengen area

Delays and complications at the border, including passport checks and customs procedures, were reported as important in shaping preferences. Interview evidence suggests that some drivers actively avoid EU work because they perceive it as more stressful, riskier, and more disruptive to family life, while others are content, or even prefer, to undertake longer EU trips.

Other factors frequently mentioned as affecting driver assignment on international routes included language skills, legal limitations on driving hours, and specialist skills required.

"The big reason why we can't use foreign drivers, the only way that we can continue to run this business is to use our own drivers because they're not just drivers, they specialise in all that paperwork. They specialise in looking after the horses, dealing with the clients directly." – Goods operator with six to ten drivers, frequently travels to mainland EU or Schengen area

Sector-specific patterns

There are some sector-specific nuances in what operators reported valuing when recruiting and allocating drivers, as mentioned in qualitative interviews.

For passenger operators, especially those running school trips or holidays, they mentioned the ability to manage passengers in a professional and customer-focused manner was critical. In interviews, operators highlighted the importance of drivers who can communicate clearly, maintain order on board, and guide groups through border processes.

"Smart, well-presented, polite, professional drivers, give good customer service. That's what our ethos is … Drivers who don't think they're a bit above most. They're experienced to a certain extent." – Passenger operator with six to ten drivers, rarely travels to mainland EU or Schengen area

"Your character has to be right, because at the end of the day you've got 51 people on board your coach, you have to make sure that they all have the best holiday. They hope if there's a problem the driver's that first port of contact." – Passenger operator with two to five drivers, frequently travels to mainland EU or Schengen area

Goods operators mentioned that international trips often involve detailed documentation and interactions with ports and customs sites. Operators preferred drivers who are competent in handling regulatory paperwork and managing these requirements.

> *"It can get complicated travelling in and out of Europe, certainly with the customs side of things. So, somebody who's dealt with that sort of thing and how to work and operate at ports is useful."* – Goods operator with two to five drivers, never or very rarely travels to mainland EU or Schengen area

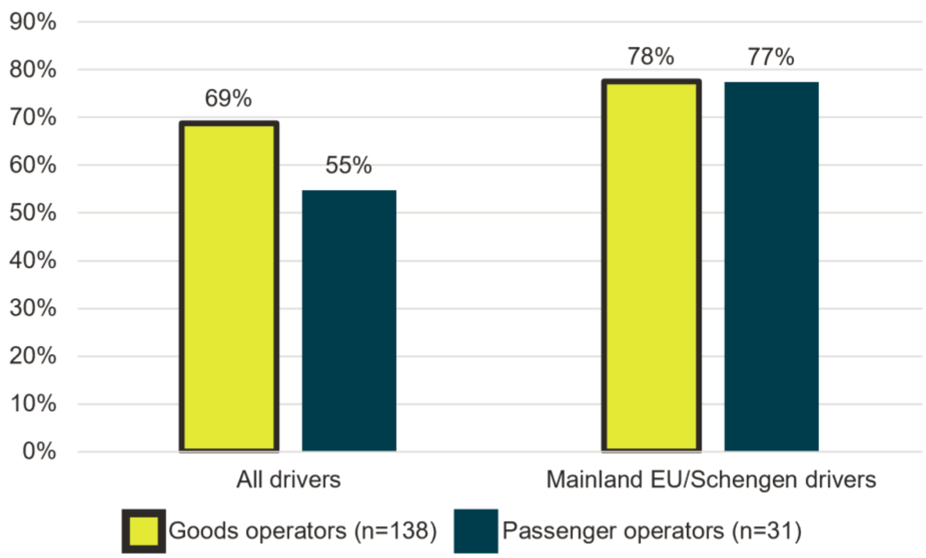
The evidence indicates that recruitment and route assignment decisions are driven by practical considerations, including skills, experience, and preferences, according to the interview findings. So far, operators suggest that nationality, and by extension attempts to manage exposure to the 90/180 rule, has not played a central role in how operators staff or allocate their GB, EU or Schengen area services.

4.5.2 Driver availability

Survey data shows that the majority of operators do not report open driver vacancies. Among operators conducting services in the mainland EU or Schengen area, 69% of goods operators and 56% of passenger operators reported no driver vacancies.

As shown in Figure 11**Error! Reference source not found.**, vacancy rates are lower, specifically for the drivers that conduct EU or Schengen area operations, with just under 80% of goods and passenger operators reporting no vacancies.

Figure 11 Operators conducting EU or Schengen area services that report no driver vacancies



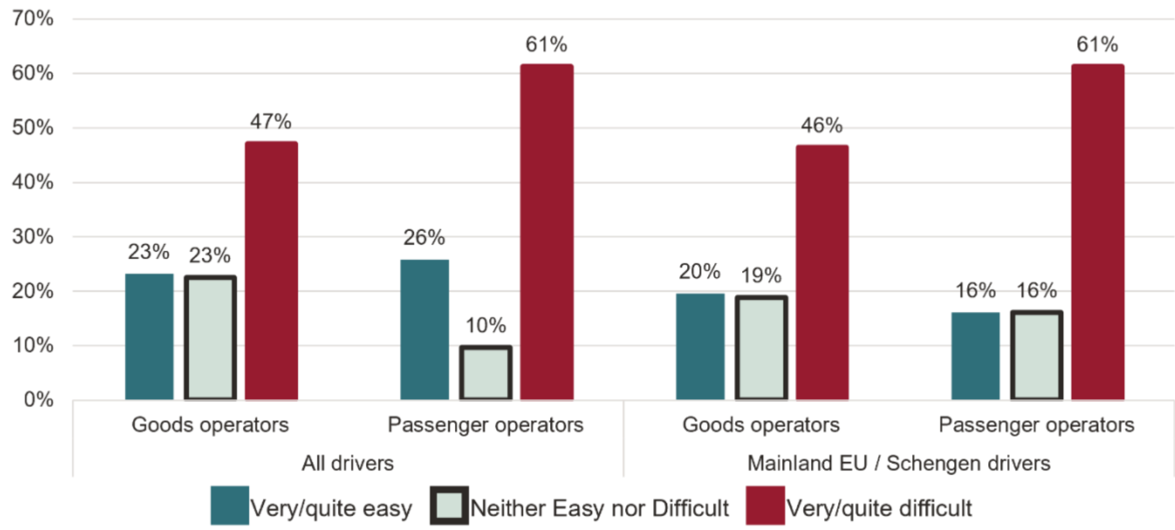
Source: Frontier Economics

Note: Based on the question: "How many vacancies does your organisation currently have for: a) all drivers, b) drivers specifically to make cross-border trips between the UK and mainland EU or Schengen area only."

When asked the extent to which the number of vacancies had changed since the UK's EU exit, only 9% of goods operators thought vacancies had increased, compared to 43% who thought they had stayed the same, and 14% who thought they were lower. For passenger operators, 26% thought vacancies had increased, 39% thought they had stayed the same.[10]

Both goods and passenger operators commonly reported that recruiting drivers is difficult. Figure 12 shows that both goods and passenger operators are most likely to respond that they find it 'quite difficult' or 'very difficult' to recruit drivers. The responses do not appear to be affected by the type of work the drivers conduct (domestic, EU, or Schengen area).

Figure 12 Relative ease of driver recruitment



Source: Frontier Economics

Note: Question asked only of operators that conduct operations within the mainland EU or Schengen area. Goods operators n=138. Passenger operators n=31.
Group totals do not sum to 100% due to 'Don't Know' responses.
Based on the question: "How easy or difficult does your organisation currently find it to recruit: a) all drivers, b) drivers specifically to make cross-border trips between the UK and mainland EU or Schengen area only."

Recruitment challenges are widely seen as having intensified since the UK's EU exit. The responses show that 38% of goods operators and 48% of passenger operators find hiring drivers 'much harder' or 'a little harder' since the EU exit, compared to just 2% and 7% (respectively) that find it 'much' or 'a little' easier.

Qualitative evidence helps to explain these challenges. Many participants described a tightening labour market for drivers. Two main explanations were given for this: i) fewer EU

[10] The remaining 35% of goods operators and 26% of passenger operators responded with 'prefer not to say', 'don't know', or 'not applicable'.

nationals available to work in the UK since Brexit, and ii) fewer people training as drivers because the role is seen as unattractive, particularly given unsocial hours and time away from home.

> *"It's been difficult for us to recruit, especially good coach drivers … there seems to be a real shortage on the amount of people out there who are doing international journeys as well has decreased."* – Passenger operator with more than 20 drivers, rarely travels to mainland EU or Schengen area

Some respondents perceived lower driver availability and commented that this was placing cost pressures on operators some of whom report having to pay higher wages and provide more benefits, such as shorter working hours, favourable trips, and more holidays to attract the right workers.

> *"We are desperately in need of workers … If we have a position here, it's really difficult to get it filled and people sort of like, can pick and choose jobs."* – Passenger operator with an unknown number of drivers, frequently travels to mainland EU or Schengen area

Overall, the evidence suggests that while many operators do not have many vacancies, those operators seeking to fill vacancies find driver availability is tighter and recruitment is more challenging than before the UK's EU exit. This is also considered to have contributed to higher labour costs and increased operational pressure, even as some EU-facing work has decreased.

4.5.3 Increases in other operator costs

More generally, interview participants also reported that operating costs had increased significantly. Respondents reported that this has reduced profitability and narrowed margins, as participants felt that rates paid to operators have not increased in step.

However, the majority of participants agreed that European jobs are better paid than UK-only trips, though these jobs also involve additional risk. Changes to EU regulations have reduced profitability, including the costs of installing new tachographs, additional toll charges, and changes to the hours drivers can work before resting.

> *"There have been changes in the price of drivers, changes in the price for insurance, changes to the price of vehicles, changes in everything except the price per mile."* – Goods operator with six to ten drivers, never or very rarely travels to mainland EU or Schengen area

5 Summary

Few SIOL-holding operators appear to face material exposure to EES and the 90/180 rule. A survey of 365 goods operators and 70 passenger operators found that only around 40% (38% and 44% respectively) reported running services that require cross-border travel between GB and the mainland EU or Schengen area. Even among these operators, just 88 goods operators and 12 passenger operators reported frequent travel (at least monthly) to the EU or Schengen area, and were therefore at risk of having drivers exceeding the 90-day limit. Overall, this is equivalent to 24% of surveyed goods operators and 17% of surveyed passenger operators.

Awareness of the underlying policy was generally high. Across all operators, 84% reported being somewhat or fully aware of the 90/180 rule, rising to 96% among those that run services to the EU or Schengen area. Awareness of EES was highest among operators travelling more frequently, with around 92% of both goods and passenger operators in this group reporting that they were somewhat or fully aware, including 65% that reported being fully aware. However, interviews suggest that detailed understanding was less developed than these headline figures imply, particularly in relation to practical issues such as counting days, treatment of leisure travel and what effective monitoring requires.

Preparedness for EES was more mixed. Among operators running EU or Schengen services, 69% of goods operators and 81% of passenger operators reported monitoring drivers' workdays in the EU or Schengen area, but only 43% of goods operators and 55% of passenger operators reported monitoring leisure days. Just 38% of goods operators and 52% of passenger operators reported monitoring both. Interview evidence suggests that even where monitoring exists, it is often informal and incomplete. This indicates that many operators may not yet have systems in place that capture drivers' full exposure to the 90/180 rule.

Operational adaptation before implementation has also been limited. Among operators running EU or Schengen services, 70% of goods operators and 52% of passenger operators reported making no operational changes to date in response to EES or the 90/180 rule. Operators did not generally report changing recruitment strategies or route allocation practices in order to manage exposure. Instead, interview evidence suggests that recruitment and route assignment continue to be driven mainly by practical operating considerations, including skills, experience, reliability, driver preferences and availability. This is an important finding, because it suggests that many operators are not currently structured around 90/180 compliance and may have less flexibility to respond if EES makes the rule more binding in practice.

Reported impacts to date appear relatively limited, but expectations of future impacts are more negative. Among operators running EU or Schengen services, 46% of goods operators and 55% of passenger operators reported that EES had already had a somewhat or very negative impact on their organisation. When asked about future impacts, this rose to 59% of goods operators and 68% of passenger operators. Interview evidence suggests that operators linked

EES closely to the expectation of stricter enforcement of the 90/180 rule, with likely effects on staffing, route allocation, service reliability and competitiveness.

These findings should also be interpreted in light of when the research was conducted. Fieldwork took place in September and October 2025, shortly before and just after the formal start of EES on 12 October 2025. As rollout was staggered, with full implementation expected by April 2026, operators' exposure to the new system during fieldwork was likely to be uneven and patchy. The findings therefore reflect a period of early implementation and adjustment, rather than settled experience of a fully rolled-out system.

Overall, the pre-implementation evidence suggests that the direct effects of EES are unlikely to be evenly felt across the sector. For many SIOL-holding operators, impacts may remain limited because their exposure to EU and Schengen travel is low. For a smaller but important group of operators, however, EES may turn what has so far been a weakly enforced constraint into a more binding operational challenge. The evidence collected in this report therefore provides a useful baseline for understanding how operator behaviour, preparedness and business impacts may evolve as EES becomes more fully operational.