

03 August 2026

Dear Monique Hawkins,

Travel Disruption and Re-entry Rights for EUSS Citizens

Thank you for your recent correspondence about the Civil Aviation (Consumer Protection and Regulatory Reform) Bill 2026 ('the Bill') and the personal impact for people affected by travel disruption on their return to the UK. We have been considering the travel journey for beneficiaries of the Agreements, the different points at which issues can arise and the impact on citizens themselves.

We recognise that travel remains a significant issue for citizens and the sector. Earlier this year, we published our [Travel Insights magazine](#) to help citizens navigate the system and understand what their right to re-enter the UK means in practice, we also updated our website to include [travel guidance](#) and additional information.

Our work to date has looked at the arrival experience at border control for individuals with EUSS status (or a pending application), who were the first cohort to use a digital eVisa. We have also been looking at issues affecting passengers before they travel, particularly as they prepare to return to the UK.

Since 2021, the IMA has received 48 complaints linked to issues when boarding at departures. They describe a range of difficulties, including people being unable to travel despite having a valid document linked to their UKVI account; share codes not being accepted or carrier staff being unable to check them; and travellers being asked for additional proof of status.

Current guidance for carriers explains that if a passenger holds an e-visa, receipt of a permission to board message on the system is satisfactory evidence of their permission to travel to the UK. Evidence may also be accepted if provided by the passenger via the UKVI 'View and Prove' system, although the guidance says this is only where a passenger does not have a physical visa or visa exemption document. The guidance goes on to say that in all cases, checks must still be done to ensure the passenger's travel document is genuine, valid, and in the possession of the rightful holder¹. We have previously written to carriers to assess their understanding of Home Office guidance.

The introduction of the Electronic Travel Authorisation (ETA) system in February 2026 has, in effect, created an additional checkpoint for people exercising their right to re-enter the UK: the point of departure. Although EUSS holders and those with a

¹ [Charging Guide Procedures - A Guide for Carriers](#)



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pending application are not required to have an ETA, we have continued to receive complaints related to entry/return since its introduction.

We are concerned about the impact on citizens who may experience disruption when travelling to the UK, including the possibility of being unable to board their flight and becoming stranded in the country from which they are travelling. We are also concerned that this risk may be increased if carriers, seeking to avoid potential fines and other costs associated with transporting individuals who are later found not to have permission to enter the UK, take a more cautious approach when assessing passengers' eligibility to travel.

The IMA has a statutory duty to monitor and promote the adequate and effective implementation of the Agreements and the rights they protect. To satisfy ourselves that the ETA system does not affect a person's ability to exercise their right to re-enter the UK, we have been gathering information on how it works in practice.

Although the additional checkpoint appears to work smoothly for most travellers, we are aware, from complaints and engagement with stakeholders, that some are experiencing disruption. We are concerned about the consequences for people who are asked to provide additional evidence, or are incorrectly asked to provide an ETA, and subsequently experience difficulty proving their EUSS status because of poor network coverage or because the traveller does not have a digital device.

For citizens, the personal impact of being wrongly denied boarding will depend on the circumstances. But they may incur additional costs for alternative travel or accommodation, disruption to work, or separation from family members travelling with them. These experiences may also weaken confidence in a system designed to protect rights under the Agreements, including the right to re-enter the UK.

The IMA's role is to help ensure that public authorities uphold the Agreements and associated rights. While carriers are private entities and therefore not public authorities within our remit, they operate within the framework of government guidance and regulations. We are also committed to raising concerns with other regulators where matters that come to the IMA's attention fall within their responsibilities. In this case, we intend to engage with the UK Civil Aviation Authority to highlight our concerns about the issues faced at the point of departure by people with EUSS status.

In light of the issues raised with us about people with EUSS status re-entering the UK, the IMA will continue to engage with the Home Office to understand how it ensures compliance with citizens' rights to travel under the Withdrawal Agreements. As part of that work, we are considering how problems at departures are resolved, including the support systems provided by the Home Office for carriers and the impact on citizens.



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We are also considering the compensation related issue you have raised with us and whether this would be suitable for further operational work by the IMA. We will ensure that updates on our work are shared through our issues log and with you in future meetings.

We will continue to monitor citizens' travel experiences through our complaint's portal, Your Story, and through engagement with stakeholders. We also appreciate the3million's continued engagement on this and other matters affecting citizens' rights in the UK.

Yours sincerely,

Mark Jeffs

Director, Operational Delivery