PASSENGER SHIPPING ASSOCIATION

20th January 2005

Mr Doyle
Victoria House
Southampton Row
London
WC1B 4AD

Dear Mr Doyle,

Please find enclosed the Passenger Shipping Association's (PSA's) Submission regarding the Brittany Ferries and P&O Ferries Merger Enquiry.

The PSA is the trade body for the Cruise and Ferry Industry in the UK. I have enclosed an information pack for you, but if you do require any further information, please do not hesitate to contact.

Kind regards

William Gibbons
Director
Passenger Shipping Association

Passenger Shipping Association Limited
4th Floor, Walmar House, 288-292 Regent Street, London W1B 3AL Telephone: 020 7436 2449 (3 lines)
Fax: 020 7636 9206 Website: www.the-psa.org Email: info@psa-psara.org

PASSENGER SHIPPING ASSOCIATION

INFORMATION PACK

Website:

www.the-psa.org

INDEX

The Organisation of the Passenger Shipping Association

The Passenger Shipping Association (PSA) is the Trade Association for Cruise and Ferry Companies operating from the UK. Cruise Companies have to have their own representation, or have a General Sales Agent in the UK. Ferry Lines have to actually operate services from the UK or services within the UK.

The Passenger Shipping Association is managed by a Council of Management which is drawn from seven Cruise Companies and five Ferry Companies. The current Chairman is Patrick Ryan, Managing Director of Royal Caribbean International, and Vice Chairman is Robin Wilkins, Managing Director of SeaFrance.

The Council of Management meets four times a year, and also has a Finance and General Purposes Committee to manage the finances of the PSA. The PSA financial year is 1st May – 30th April. The Annual General Meeting is normally held in July. The Chairman of the F & GP Committee is David Longden, Managing Director of Brittany Ferries. Under the Council of Management, the PSA is organised into two sections: the Ferry Section and the Cruise Section. Each Section meets approximately four times per annum.

The Chairperson of the Cruise Section is Carol Marlow of Swan Hellenic/Princess Cruises, and the Chairman of the Ferry Section is Lars Olsson, Route Manger, Harwich-Hook for Stena Line.

The majority of the Cruise Lines has been working together to promote cruising with a Generic Campaign, using the Public Relations Firm BGB & Associates. This Campaign has now been running since May 1997.

Since July 2003, major Ferry Companies have been working together to promote the benefit of ferry travel, compared to the low-cost airlines. "SailandDrive.com" shows comparative prices for ferry travel versus flying.

The PSA is run on a day to day basis by a Director, an Assistant Director and a Secretariat.

The Director is currently William Gibbons, who joined the PSA in April 1994. Prior to that he was a Consultant, General Manager of Sealink Ferries to the Isle of Wight and Ferry Line Manager for the Harwich-Hook route.

The Assistant Director is Bryony Coulson, who is also the General Manager of the PSA's subsidiary Company PSARA (Passenger Shipping Association Retail Agent Scheme), which trains and educates Travel Agents to be aware of and sell the Cruise product. Bryony Coulson was previously with Hoverspeed, Stena Sealink and Saga.

The Assistant to the Director of the PSA is Hayley Tapping. Jules Rogers is Marketing Executive of PSARA and Emma Ali is the Administration Assistant for both PSA and PSARA. Maggie Davies is the recently appointed Membership Services Executive for the Associate Membership Scheme.

The PSA Solicitors are Hill Taylor Dickinson.
The PSA Accountants are Baker Tilley.

MISSION STATEMENT, OBJECTIVES, STRATEGIES
of the Passenger Shipping Association

Mission Statement

To provide a service of excellence to the Members, and Associate Members, of the PSA. To ensure that the PSA is the recognised industry body for the Cruise and Ferry Sectors. To act as a forum for discussion on areas of mutual interest.

Objectives

- The promotion of travel by sea by the public.
- To encourage expansion in the volume of passenger travel, by sea and river.
- To work towards the removal or prevention of the imposition of restrictions or taxes on passenger travel by sea.
- To advise Member Lines to ensure that passengers travel in a safe, healthy and secure environment.

Strategies

1. Lobby Government and European Union.
2. Work with, and through, other bodies, mainly – Association of British Travel Agents (ABTA), Chamber of Shipping (COS) and the European Community Shipowners Association (ECSA).
3. To provide a forum for the training and education of travel agents through its subsidiary company PSARA.
4. To act as spokesperson for the industry.
5. To co-ordinate the activities of Member Lines as required.
6. To act as an information centre for Member Lines and Associate Members.
7. To act as a statutory bonding authority for Member Lines as required.
8. To promote market growth in the passenger shipping industry through voluntary funded generic public relations campaigns.
9. To ensure that member companies are aware of the best practice and the statutory regulations on safety, the protection of the environment, health, hygiene and security.

HISTORY

PSA (The Passenger Shipping Association) as it is known today, was formerly Ocean Travel Development (OTD). OTD was formed in 1958 as an Association of Passenger Ship Owners. 1957 had seen, for the first time, the number of passengers travelling across the North Atlantic by air exceeding the numbers travelling by sea in the great liners. OTD's main objective was to focus public attention, and that of the travel trade, on sea travel as a holiday leisure pursuit, and as the modern alternative to transportation from A to B. The shipping lines conceded that they could no longer compete with the developing airlines, both in regard to travelling time and cost. They also recognised that their future lay in full-time cruising.

To achieve this aim, OTD devoted most of its resources to promoting holidays at sea through Advertising, PR and Publicity and Travel Agency Support. There was an "Ocean Travel Fortnight", when window displays were supplied free of charge to all agents, plus an Ocean Princess competition, a "visit a ship" scheme, a camera at sea contest, a regular agents newsletter "Full Ahead Together" and many other activities arranged to focus public attention on passenger shipping, and direct the consumer into the Travel Agents' offices. By far, the most important activity was in education and training for the travel trade. OTD ran correspondence courses in shipping geography, followed by seminars on board ships in port, culminating with seminars at sea. Several thousand agents completed the course, and many are still with us today and rank among the most productive agents for shipping.

With the development of ferry services, and inclusive holiday arrangements based on ferry routes, OTD expanded its membership to embrace the car ferry companies. An annual 'car ferry fortnight', on similar lines to Ocean Travel Fortnight, was organised, plus many other activities relating to ferry services.

In 1976, it was agreed by the shipping lines that the Association's name should be changed to Passenger Shipping Association (PSA), as it was felt that the new name reflected more accurately the purpose of the Association. At the same time, it was also agreed to review its objectives. The new objective concentrated on liaison with Government and ABTA, (Association of British Travel Agents), and the protection of Member Lines' interests in such matters as pilotage, light dues, the retention of duty free concessions and other matters directly affecting the lines themselves.

In 1986, Consumer Protection methods, similar to those already practised by ABTA, were established for all cruise companies selling in the UK, as well as being imposed on the package tours operated by PSA Member Ferry Companies. Bonding, to provide financial protection to the passenger and independent conciliation, and arbitration procedures are now administrated by the Association. The Association is also an important corporate contact for the media, seeking information on both Cruising and Ferry markets.

In 1987, the PSA formed a subsidiary company, The Passenger Shipping Association Retail Agents Scheme (PSARA). This organisation was entrusted with the task of fulfilling the travel agency educational role. The Scheme is self-funding, based on contributions from both the Cruise Industry and Retail Travel Agents. Cruise manuals, newsletters, freefone hotline information and an extensive programme of training seminars, are the basis of membership benefit. The PSARA scheme is an important factor in the growth of cruising traffic in the UK, and is steadily increasing its membership in the travel agency world.

The PSA Membership is now divided into two sections, Cruise and Ferry, which meet quarterly under their respective Chairman to provide an important forum to discuss matters of industry interest. The Association itself operates under the control of a Council of Management, composed of members elected by the membership to represent all interests represented within the Association.

The PSA is now widely recognised as the body that truly represents all passenger shipping interests with the UK, and confidently looks to an expanding market in the years to come.

COUNCIL OF MANAGEMENT (Until 2nd July 2004)

F	**John Crummie** **DFDS Seaways**	**Chairman**
C	**David Dingle** **CARNIVAL (UK)**	
C	**Paul Ellerby** **COSTA CRUISES**	**Chairman** **PR Committee**
F	**Simon Johnson** **P & O FERRIES**	
C	**Nigel Lingard** **FRED. OLSEN CRUISE LINES**	
F	**David Longden** **BRITTANY FERRIES**	**Chairman of F & GP**
C	**Carol Marlow** **PRINCESS CRUISES/SWAN HELLENIC**	**Chair** **Cruise Section**
F	**Lars Olsson** **STENA LINE BV**	**Chairman** **Ferry Section**
C	**Peter Pate** **MEDITERRANEAN SHIPPING CRUISES**	
C	**Patrick Ryan** **ISLAND CRUISES**	**Vice Chairman**
C	**David Selby** **THOMSON CRUISES**	
F	**Robin Wilkins** **SEAFRANCE**	

C = Cruise
F = Ferry

P.S.A. CRUISE MEMBERS 2004 - 2005

Arcalia Shipping Co
Carnival (Holland America/Carnival Cruise Lines/Windstar)
Costa Cruise Lines
Crystal Cruises
Cunard Seabourne Ltd
Discovery Cruises
easyCruise
Fred. Olsen Cruise Lines
Grimaldi Cruises
Hebridean Island Cruises
Island Cruises
Louis Cruise Lines
Mediterranean Shipping Cruises
Norwegian Coastal Voyage
Norwegian Cruise Line/Orient Lines Ltd
Oceania
Orient Express Trains & Cruises
P & O Princess Cruises (P & O, Princess, Ocean Village, Swan Hellenic)
Page & Moy
Peter Deilmann Cruises
Radisson Seven Seas Cruise Line
Royal Caribbean International (Royal Caribbean, Celebrity)
Safmarine
Saga
Seadream Yacht Club
Silversea Cruises
Star Cruises (UK) Ltd
St Helena Line
Thomson
Travelscope
Voyages of Discovery

31 Cruise Line Members

P.S.A. FERRY MEMBERS 2004 - 2005

Brittany Ferries
Caledonian MacBrayne
Condor Ferries
DFDS Seaways Ltd
Fjord Line
Grandi Navi Velcohi
Hoverspeed
Irish Ferries
Isle of Man Steam Packet
Norfolk Line
Northlink Ferries
P & O Ferries
Red Funnel Group
SeaFrance
Smyril Line
Stena Line
Stena BV
Swansea Cork Ferries
Wightlink

19 Members

P R SUB-COMMITTEE MEMBERS

Paul Ellerby	**COSTA CRUISES (CHAIRMAN)**
Edwina Lonsdale	**CRYSTAL CRUISES**
Michael Gallagher	**CUNARD SEABOURN LTD**
Wendy Hooper-Greenhill	**FRED. OLSEN CRUISE LINES**
Bronwen Griffiths	**P & O CRUISES**
Lynn Narraway	**CARNIVAL CRUISES**
Rachel O'Reilly	**THOMSON**
Michele Andjel	**ROYAL CARIBBEAN INTERNATIONAL**

F & GP COMMITTEE MEMBERS

David Longden	**BRITTANY FERRIES**
John Crummie	**DFDS SEAWAYS**
Nigel Lingard	**FRED. OLSEN CRUISE LINES**
Patrick Ryan	**ROYAL CARIBBEAN INTERNATIONAL**
Robin Wilkins	**SEAFRANCE**

Brittany Ferries and P&O Ferries Merger Enquiry

Comments from the Passenger Shipping Association

January 2005
(Final Version)

1. Introduction and summary

The Competition Commission invited the Passenger Shipping Association (PSA) to comment on its enquiry into the proposed acquisition by Brittany Ferries of certain assets used by P&O Ferries to supply ferry services between Portsmouth and Le Havre by 17th January 2005 (includes extension from original date of 6th January 2005). The issues relevant to the enquiry on which the PSA were asked to comment were:

a) the relevant market
b) competition within the product and geographical markets identified in the terms of reference, and any other market definition
c) barriers to entry to such markets
d) the effect of the proposed acquisition on customers and suppliers; and
e) the effect on the level of prices and variety and quality of services.

The PSA is the UK's trade association for passenger (cruise and ferry) shipping operators. It represents 19 ferry companies operating out of the UK including all major companies operating passenger services to the Continent. In this submission the PSA is reflecting an assessment of the passenger market as a whole (excluding freight) and has not sought to represent any particular sector of passenger ferry operators.

Western Channel ferry services operate principally in the outbound leisure travel market to the Continent, notably in the sub-sector of independent travel to France and Spain. In recent years the independent leisure market to the Continent has been subject to intense competition from the development of low cost airlines. The Western Channel sector has lost share and requires supply restructuring to be sustainable.

There are no major regulatory restrictive barriers to entry other than those concerned with safe operations and consumer protection. Clearly any operator will need to negotiate suitable berthing slots in the Ports both in the UK and on the Continent. There is an over supply of capacity on the routes from Dover and on the Western channel in a declining market. The competition from the Channel tunnel and the Low cost Airlines is intense. It is well know that P&O ferries have been making substantial losses on these routes for many years. The financial case for new entrants is currently very poor.

There will be an impact on suppliers and customers if the proposed acquisition does not go ahead and the Portsmouth to Le Havre route is cut. Existing demand on the Portsmouth to Le Havre route at over 600,000 passengers per year is equivalent to 15% of ferry passenger supply on the Western Channel. Between 1999 and 2003, demand for Western Channel ferry services fell by nearly 13%. Existing demand for the Portsmouth to Le Havre ferry route will be dissipated across other Western Channel routes, Short Sea routes and other modes of transport to the Continent. The competitive pressures on the remaining routes and operators maybe less but they will still exist and price and quality pressures will ensure value for money for ferry customers.

In view of the competitive pressures on Western Channel from Short Sea crossing routes, the Channel Tunnel services and the rapid development of low cost airlines it is the PSA's view that the proposed acquisition is a rational and equitable restructuring of passenger ferry supply in the Western Channel, for sustainable customer choice and British seafarer employment.

This summary is based on market research provided to the PSA by IRN Research and outlined in the following sections under The Market, The Consumer, The Product and Competition.

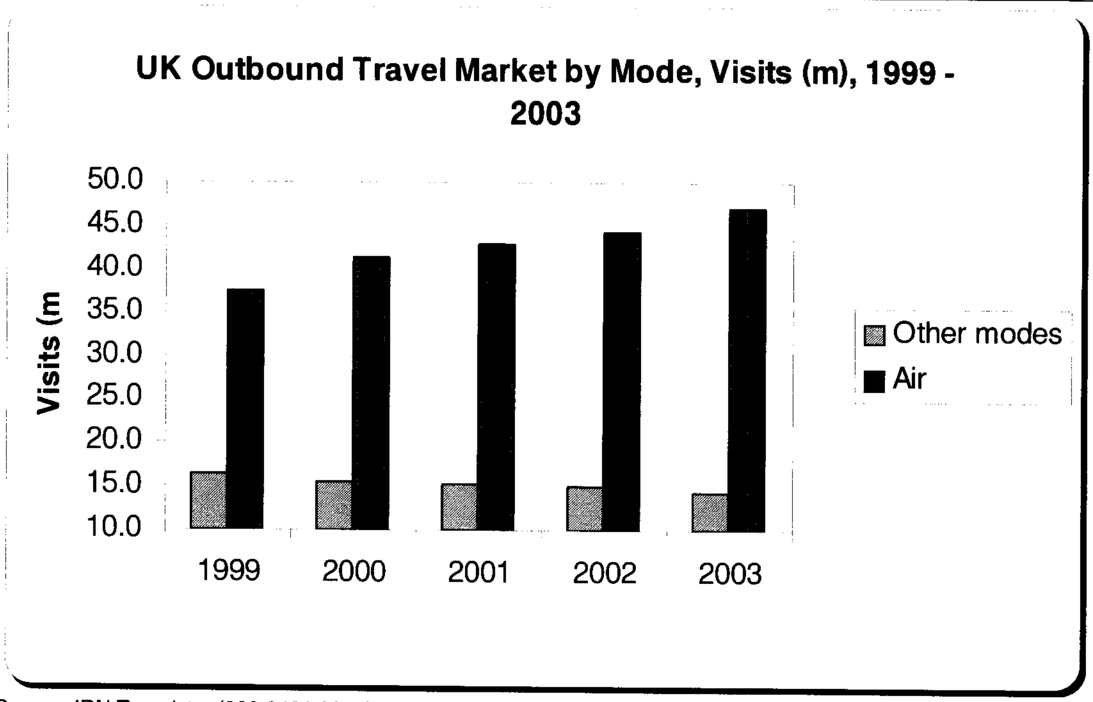
2. The Market

2.1 Western Channel (See Notes) passenger ferries serve both the outbound travel market for UK residents and the inbound travel market for overseas residents. The outbound passenger travel market is much more important to Western Channel ferry operators than the inbound market. Between 1999 and 2003, the percentage of UK residents on international Western Channel passenger ferries varied between 83% and 86%.

2.2 Despite the reliance of Western Channel ferry operators on the outbound travel market, Western Channel ferry operators account for a small percentage of the outbound travel market. Between 1999 and 2003, the Western Channel's share of the total outbound market fell from 3.8% to 2.9% as the outbound market grew by 14% from 53.9 to 61.4 million UK resident visits. Over the same period, the number of UK resident visits on Western Channel ferry routes fell by 13% to a little over 1.8 million visits.

Table 1: UK Outbound Travel Market, UK resident visits overseas (million), 1999 - 2003

(million visits)	1999	2000	2001	2002	2003	% change
Other modes	16.37	15.45	15.27	15.09	14.32	-12.5
Air	37.51	41.39	43.01	44.28	47.10	25.6
Group Total	53.88	56.84	58.28	59.38	61.42	14.0



Source: IRN Travelstat (020 8481 8831)

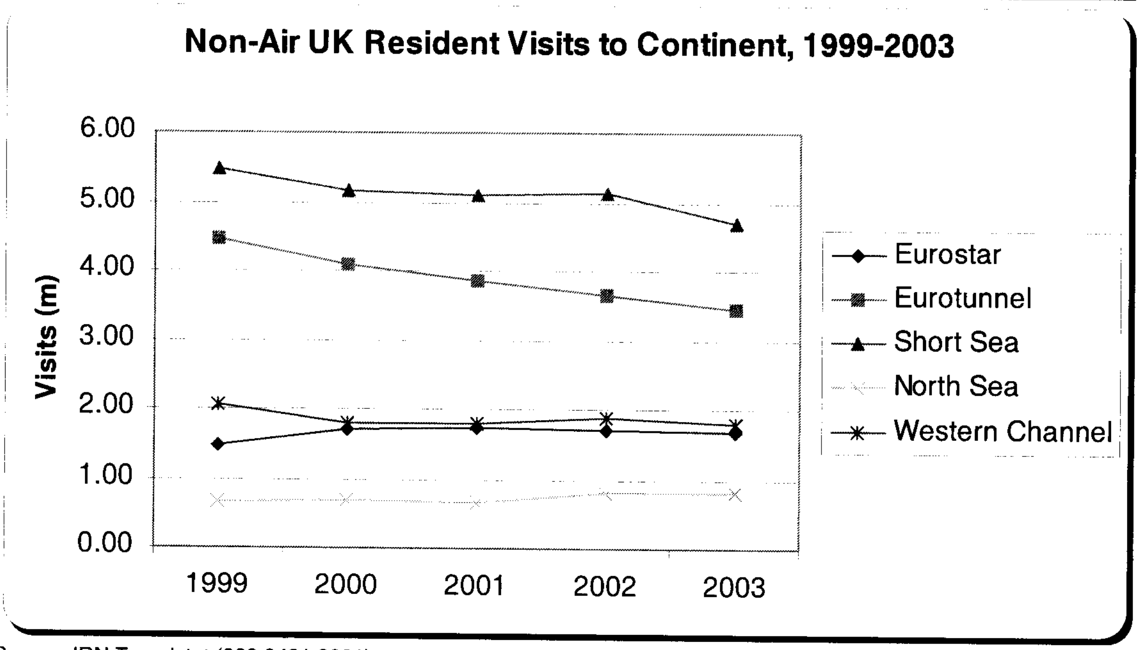
2.3 The recent growth trends in the outbound travel market have been characterised by the growth in air travel stimulated by the development of low cost carriers at the expense of other modes of transport.

2.4 The rapid development of low cost air travel has been met with increasing competition from other modes of transport but only the North Sea ferry operators and

Eurostar managed volume growth in the outbound market between 1999 and 2003. Over the period Western Channel operators lost 265,000 outbound resident visits, compared with over 790,000 lost by Short Sea ferry operators and over a million by Eurotunnel Shuttle services. However, it should be noted that the Short Sea and Eurotunnel sectors are considerably larger than the Western Channel.

Table 2: Non–Air UK Outbound Travel Market to the Continent, UK resident visits overseas (million), 1999 - 2003

(million visits)	1999	2000	2001	2002	2003	% change
Eurostar	1.47	1.71	1.75	1.70	1.67	13.8
Eurotunnel	4.47	4.09	3.87	3.65	3.45	-22.9
Short Sea	5.48	5.17	5.10	5.14	4.69	-14.4
North Sea	0.66	0.70	0.67	0.82	0.80	21.2
Western Channel	2.07	1.79	1.80	1.88	1.80	-12.8
	14.15	13.45	13.19	13.19	12.42	-12.3



Source: IRN Travelstat (020 8481 8831)

2.5 The impact of low cost air travel to ferry routes to France is illustrated in Table 3. Passenger traffic on ferry routes to France declined by 32% compared with an increase in air traffic to France of 71% over the 1997 to 2004 period.

Table 3: UK – France, Passenger traffic, comparison between Air, ferry and Tunnel, Pax (000s), 1997 - 2003

Pax 000s	1997	1998	1999	2000	2001	2002	2003	2004	% change
By Ferry	26,819	23,997	22,309	19,857	19,453	20,575	18,963	18,153	-32.3
By Air	6,443	7,073	7,592	8,250	8,435	9,658	10,228	*11,046*	+71.4
By Tunnel	15,203	19,415	18,675	18,409	17,781	16,727	16,333	16,586	+9.1

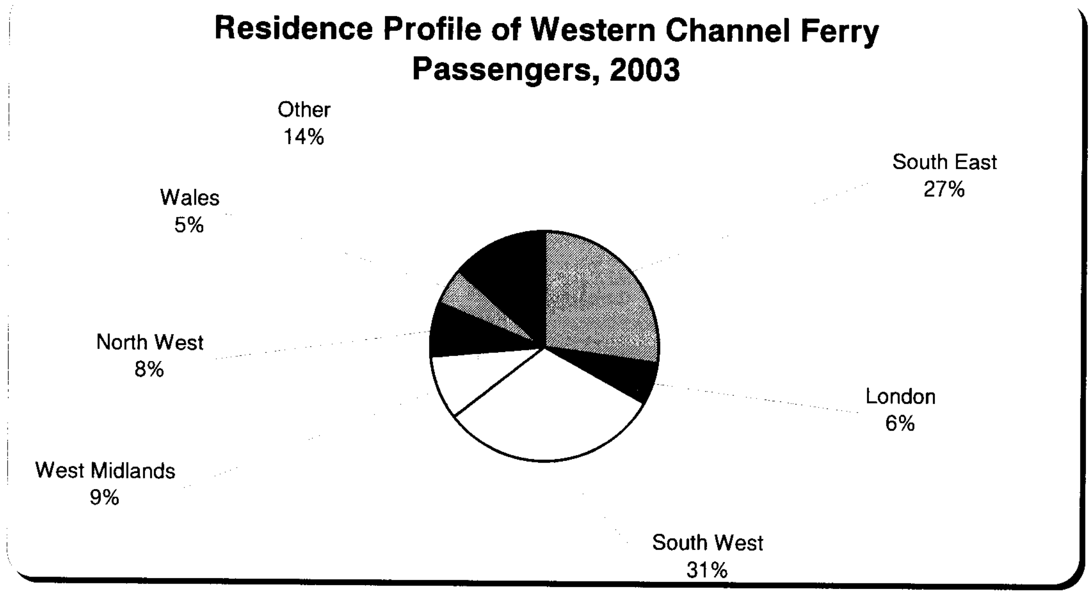
Italics – *Estimate*
Source: IRN Ferrystat/CAA (020 8481 8831)

3. The Consumer

3.1 The consumer profile of Western Channel ferry passengers is slightly biased towards the South West and the South East of England. In 2003, more than 1.0 million outbound Western Channel passengers were resident in the South West or South East of England, equivalent to 58% of all outbound passengers on Western Channel routes. Although the residency profile is biased towards the South West, Western Channel passenger ferries draw passengers from all over the UK.

Table 4: Residence Profile of Western Channel Ferry Passengers, 2003

	South West	South East	West Midlands	North West	London	Wales	Other
% pax	31	27	9	8	6	5	14



Source: IRN Travelstat (020 8481 8831)

3.2 Despite the proximity and ease of access from the South West to Western Channel ports, the outbound market from the South West is not reliant on Western Channel ferry operations. In 2003, a little over 12% of outbound resident visits from the South West used Western Channel ports. Even if air travel is excluded from the market, Western Channel ports accounted for only 51% of the non-air outbound market from the South West in 2003. Out of 813,000 visits from South West residents crossing the English Channel by sea in 2003, 261,000 or 32% opted for Short Sea crossings rather than Western Channel ports.

3.3 Excluding bias of residency, the profile of the outbound Western Channel ferry passengers is broadly similar to that of all outbound passengers to the Continent although the Western Channel passengers are more likely to be male and are slightly older.

Table 5: Age and Gender Profile of Western Channel Ferry Passengers, 2003

% of visits	Western Channel			All UK Continent visits		
	Male %	Female %	Total %	Male %	Female %	Total %
0-15	5	4	9	4	4	8
0-15 in school party	1	0	1	1	0	1
16-24	2	2	4	4	4	8
16-24 in youth party	0	0	0	0	0	0
25-34	5	4	9	10	9	18
35-44	11	10	21	12	10	22
45-54	15	8	23	11	9	20
55-64	13	8	21	8	7	15
65+	7	4	12	4	4	8
Group Total	59	41	100	54	46	100

Source: IRN Travelstat (020 8481 8831)

3.4 Most Western Channel passengers are experienced independent travellers who have selected particular sea routes to suit their particular timetable and price requirements. There is a relatively high degree of customer loyalty but customers will change routes and brands if the destination is changed, on the basis of price of if the ferry is delayed or cancelled.

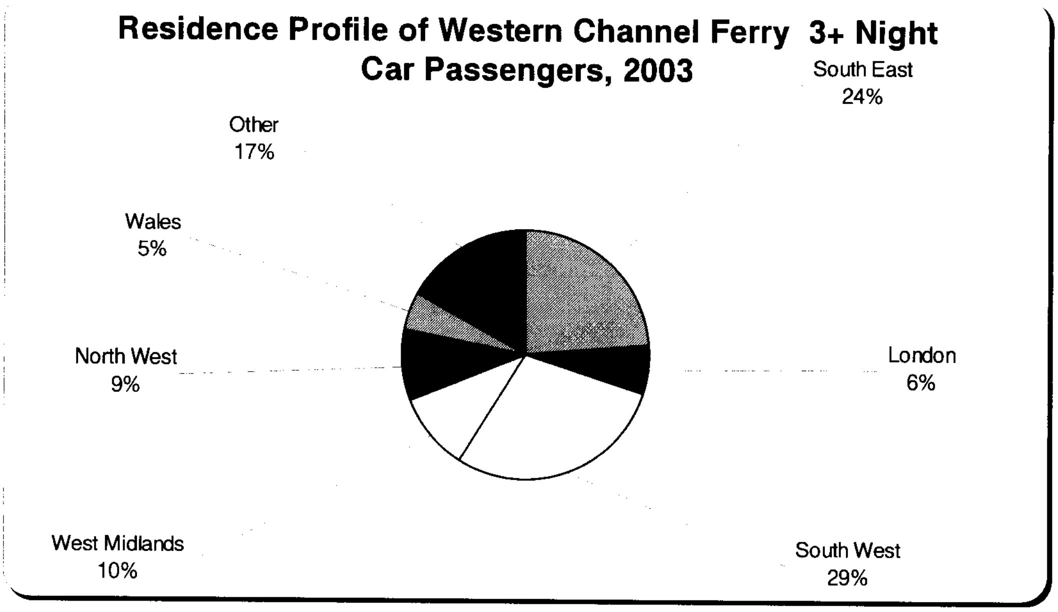
3.5 While there is a relatively high degree of route loyalty and loyalty to sea crossings, the development of low cost airlines and the option of car hire at the final destination has undoubtedly caused migration from sea crossing to air at a price. The Short Sea is also an alternative.

4.0 The Product

4.1 Although there is a range of products offered on the Western Channel from seasonal short fast ferry crossings from Portsmouth to Caen to overnight "cruise-like" products to Spain, Western Channel ferries are dominated by three plus night trips by car on independent holidays. In 2003, more than 1.3 million outbound visits were three nights or more out of a total of 1.8 million. 1.2 million outbound visits of three nights or more were by car. Nearly 1.5 million or 83% of all outbound trips on the Western Channel were by car in 2003.

Table 6: Residence Profile of Western Channel 3+ Night Car Passengers, 2003

	South West	South East	West Midlands	North West	London	Wales	Other
% pax	29	24	10	9	6	5	14



Source: IRN Travelstat (020 8481 8831)

4.2 The residency profile of the Western Channel car passenger market is similar to that of all Western Channel passengers with a bias to the South West but nevertheless Western Channel passenger demand is prevalent across the UK. In 2003, the equivalent of 7.7% of the South West's population went on a Western Channel Ferry compared with 2.3% for the UK population overall.

4.3 In 2003, 21% of all outbound visits by car to the Continent used Western Channel routes compared with 38% for Short Sea crossings and 37% for Eurotunnel. The driving force for demand on the Western Channel is predominantly France as a destination and Spain for the two routes to Spain (Portsmouth to Bilbao and Plymouth to Santander)

4.4 As most passengers on Western Channel ferry routes are leisure travellers on holiday or Visiting Friends and Relatives (VFR), the average duration of trips on the Western Channel tend to be longer than on other sectors. In 2003, the average duration of an outbound trip on the Western Channel was 12.3 nights compared with 8.1 nights on any sector. Nevertheless, the Short Sea sector (including Eurotunnel) competes with Western Channel sector and has the advantages of frequency, choice and short crossings.

5 Competition

5.1 In 2004, there were four passenger ferry operators serving 9 routes in the Western Channel from Newhaven-Dieppe operated by Hoverspeed in the east to Plymouth-Santander operated by Brittany Ferries in the west. In 2004, Portsmouth-Caen was the most popular route with over a million passengers served by both P&O and Brittany Ferries. The least popular route was Condor's Weymouth-St Malo route with 108,000 passengers in 2004. However, this route also serves the Channel Islands with approximately 400,000 passengers per annum.

Table 7: Western Channel Passenger Market (000s), 2001-2004

Passengers (000s)	2001	2002	2003	2004
Newhaven/Dieppe (Hover)	292	260	277	227
Newhaven/Dieppe (Trans)	Not available (na)	na	na	na
Plymouth/Roscoff (BF)	445	498	478	480
Plymouth/Santander (BF)	134	129	119	136
Poole/Cherbourg (BF)	481	501	501	408
Portsmouth/Bilbao (P&O)	219	212	190	173
Portsmouth/Caen	878	887	942	1,049
Portsmouth/Cherbourg	948	930	772	730
Portsmouth/Le Havre(P&O)	814	859	755	631
Portsmouth/St Malo (BF)	489	502	457	489
Weymouth/St Malo (Condor)	77	98	110	108
Other	0	3	7	2
Total	4,778	4,878	4,608	4,433

Source: IRN Ferrystat (020 8481 8831)

5.2 Apart from BAI's changes, there have been few developments in the Western Channel passenger services structure in the last three years although P&O started a Portsmouth to Caen service in 2004. Brittany Ferries started a Portsmouth to Cherbourg service in that year, introduced the new builds Mont St Michel and Pont Aven in 2003 and 2004 respectively and has announced expansion on Portsmouth to Caen and Portsmouth to Cherbourg for 2005.

5.3 The short sea routes compete with the Western Channel routes. In the last few years, this sector has attracted new entrants (Speed Ferries and Norfolk Line) as unit costs are much lower than those of the Western Channel because of the frequency of sailings. One of the reasons that the Western Channel has not attracted new entrants is that the economic case is more difficult to make.

Notes

IRN – IRN Research is a market research consultancy. Established in 1991, IRN is a member of the British Market Research Association (BMRA).

IRN Ferrystat – IRN has collated ferry traffic statistics for PSA members under the IRN Ferrystat brand since 1993. IRN Ferrystat provides a monthly statistical breakdown of passenger, car and coach traffic by every major passenger ferry route in the UK.

IRN Travelstat – IRN has been a marketing agent for the Government sponsored International Passenger Survey (IPS). The survey is based on 260,000 interviews per year of inbound and outbound visitors to the UK. IRN's analysis of the raw survey data is branded IRN Travelstat.

PSA – The Passenger Shipping Association (PSA) is the UK's trade association for passenger (cruise and ferry) shipping operators. It represents 19 ferry companies operating out of the UK including all major companies operating passenger services to the Continent. The PSA's mission is to provide a service of excellence to the Members, and Associate Members; to ensure that the PSA is the recognised industry body for the Cruise and Ferry Sectors; and, to act as a forum for discussion on areas of mutual interest.

PSA Objectives

- The promotion of travel by sea by the public.
- To encourage expansion in the volume of passenger travel, by sea and river.
- To work towards the removal or prevention of the imposition of restrictions or taxes on passenger travel by sea.
- To advise Member Lines to ensure that passengers travel in a safe, healthy and secure environment.

Western Channel – Western Channel is defined as UK - Continent ferry routes crossing the English Channel from UK ports west of Kent. It includes routes operating out of Newhaven (i.e. Newhaven-Dieppe). Some commentators include Newhaven – Dieppe as a Short Sea Crossing route (i.e. Continental routes out of Kent). Nevertheless, excluding Newhaven – Dieppe from the analysis of the Western Channel included in this report will not materially affect the findings and summary.