Chairman,

Members of the Committee,

Thank you for your invitation providing the opportunity to join you today to discuss the EU-wide traffic light system for travel and COVID-19 testing at airports.

Firstly, I want to pass on the apologies of Mr. Peter Kearney, Chief Executive of the Irish Aviation Authority (IAA), who was unable to attend the meeting today. As Head of Corporate Affairs with the IAA, I am presenting on behalf of Mr. Kearney. I am also joined by Mr. Niall Connors, Acting Director of the Safety Regulatory Division.

For members of the Committee who are not familiar with the Irish Aviation Authority, I will briefly outline our role and functions before discussing the main topic of today's meeting.

The Irish Aviation Authority

The Irish Aviation Authority is a financially independent, commercial semi-State company founded in 1994, under the provisions of the Irish Aviation Authority Act 1993.

We carry out three key functions under statute.

Firstly, we are the national aviation safety regulator. We oversee and enforce all aspects of aviation safety in Ireland, in line with International and European rules and guidelines. ***Safety is the Irish Aviation Authority's number one priority and I am pleased to say that Ireland is consistently audited as being one of the top performing countries in the world for effective implementation of safety rules in aviation.***

Secondly, we are responsible for the oversight of security in the Irish aviation industry. We oversee security compliance and security standards for all aviation installations and facilities in the country as well as for aviation professionals.

Finally, we provide air navigation services in Irish airspace, air traffic management services at the State airports, Cork, Dublin and Shannon, and aeronautical communications services over the North Atlantic Ocean. We manage over 450,000 square km of airspace and are ranked internationally as one of the best performing air traffic management providers globally.

The Irish Aviation Authority also manages the world's first ever global emergency aircraft location service. The Aireon Alert system, operated from our centre at Ballygirreen, Co. Clare provides a free service for airlines around the world, tracking the precise location of thousands of flights each day. This system greatly reduces the possibility of an event like the disappearance of Malaysia Airlines Flight 370 in 2014 from reoccurring.

The Irish Aviation Authority employs just over 700 people at our facilities in Dublin, Co. Clare and Cork. Like all aviation businesses, COVID-19 has hit us hard. Our revenues are almost all directly related to aircraft volumes in Irish airspace; with the sudden and dramatic decline this year, we are keeping our business afloat through a combination of significant cost containment measures and utilising reserves built up in recent years.

As previously stated, our number one priority in all areas of our business is safety. Throughout this pandemic, we have continued to provide our essential services in a safe and efficient manner, keeping Ireland's skies open for vital connectivity including the delivery of medical and personal protective equipment supplies. By providing the aviation sector with important exemptions and alleviations, we supported the efficient and safe return to service after the initial lockdown.

COVID-19 Impact on Irish Aviation

The COVID-19 pandemic has devasted the aviation industry in Ireland. We know the Committee has received statements from airports and Irish-based airlines regarding the impact and, as such, we know you are familiar with just how bad things are. There is no way to sugar coat it. To put things in perspective, air traffic levels, after the initial complete shut-down in April and May, have now reverted back to levels we would have last seen in the late 1980s. This is the same for our business connectivity, with many routes either not operating or operating a skeletal service. The European aviation sector will record over €140 billion in lost revenue in 2020 while things are not looking very encouraging for 2021, with lockdowns returning across Europe. Most analysts forecast it will be 2024 or 2025 before the industry recovers fully – for whatever industry is left at that stage.

The Irish Aviation Authority managed 38,172 flight movements in September 2020, compared to 108,523 in September 2019, a 64.8% decrease. It is important to highlight that levels of air traffic in Ireland are consistently below the rest of the European air traffic network. This trend is deeply worrying from an economic perspective. While the rest of the European network has rail and road connectivity to fall back on, Ireland, as an island nation, does not. As a country we depend on international trade and with a strong tourist and hospitality sector dependent on aviation, this disastrous situation cannot be allowed to continue as it impacts not just the whole aviation sector but also the social and economic wellbeing of the country.

Unless urgent action is taken at a political level, the Irish aviation industry which, as a nation, we have been so proud of over the past 30 years, will not exist. The only way Ireland's aviation industry can start to recover and reach some level of sustainability is when passengers can travel throughout Europe with minimal restrictions. Anything else is a band aid solution; not suitable for the scale of this crisis.

Prior to the pandemic, Ireland's aviation sector was the envy of the world. For a nation of our size to have Europe's largest and most successful airline based here, to be the largest global hub for aircraft leasing, to have one of Europe's top ten airports, to have a safety regulatory regime ranked in the top five globally and to have the daily responsibility for management of all traffic into and out of Europe on the vital transatlantic routes, emphasises the importance of the industry to the Irish economy. However, it also emphasises what we stand to lose unless we address this issue now.

Living with COVID-19

We have entered a period in Ireland where there is recognition that, as a society and an economy, we need to live with COVID-19. While the current Level 5 restrictions offer us the chance, as a nation, to reduce the prevalence of the virus and the pressure on the health system as we come into winter, Minister Donohue has acknowledged that continual lockdowns are not sustainable from an economic point of view. As a country, we simply cannot afford it and we ultimately must move to a more sustainable strategy for business and society. Aviation and travel are no different.

Living with the virus means that we continue to do as many of the things that we normally do as a society but where appropriate we adapt our behaviours and accept certain restrictions, weighing up the risks attached to the virus. From an aviation perspective, living with the virus means that we need to get people travelling again, reopen our vital connectivity links and remove the incorrect and negative perceptions around the risks associated with travel. Unfortunately, to date, the aviation industry is not living with the virus, but rather the industry is dying.

Therefore, what does living with the virus mean in an aviation and travel context?

Quite simply, it means that there is an effective and harmonised system of travel across Europe, applied equally by all Member States, AND that pre-departure testing is implemented as soon as possible. What these two mechanisms will achieve is quite straightforward – when making a booking, passengers can be sure that the flight will take place and the rules won't change, while passengers and the public alike will be reassured that the virus is not circulating through air travel. In other words, if you return a positive test, you do not travel. This is living with the virus in action; fair and simple rules with appropriate mitigations to combat identified risks of transmitting the virus.

Indeed, it has already been established that there is minimal risk of transmitting COVID-19 both in airports and onboard aircraft. The Irish Aviation Authority has worked with the Government and with aviation safety regulators across Europe to develop and implement the joint European Union Aviation Safety Agency and European Centre for Disease Prevention and Control aviation health safety protocol and the national protocol in this area. Passengers can be fully confident that airlines and airports are doing all in their power to prevent transmission. Mr. Patrick Ky, Executive Director of the European Union Aviation Safety Agency told the Sarah McInerney show on RTE Radio 1 in July that there is effectively no risk of COVID-19 transmission in-flight or in-airport. With appropriate social distancing in place, use of face coverings, high-efficiency particulate air (HEPA) filtration systems on aircraft and continual cleaning and disinfection, aviation is a safe way to travel.

The Irish Aviation Authority has monitored the implementation of these protocols by Irish operators. We are satisfied that Irish operators are acting in line with protocols. However, the protocols should be treated as dynamic living documents and as we learn more about the virus and its transmissibility, the protocols, their implementation and enforcement should be open to edits and updates.

EU Traffic Light System for Travel

The Irish Aviation Authority has welcomed the Government's intention to adopt the EU-wide traffic light system which was agreed at Council level last week. While we believe the system is a step in the right direction, we do not believe that it has gone far enough, nor does it achieve the levels of EU-wide coordination required to provide for a sustainable return for aviation.

The mechanism provides for a traffic light coding of European countries based on the number of cases per 100,000 population in the last 14 days, the number of tests carried out and the percentage of positive tests. While air travel should be unrestricted between green countries, the approach bestows upon Member States to apply quarantine or other restrictions, especially for orange or red States. This level of ambiguity, with the potential for continued blanket restrictions, will effectively render the approach useless.

A cursory glance at the latest travel map, from the European Centre for Disease Prevention and Control, shows that the majority of Europe is coded red, which effectively prevents air travel. While we understand this abundance in red reflects the recent surge in community transmission in each country, it also highlights to us the immediate ineffectiveness of the traffic light system in terms of reopening borders. It shows that, while the mechanism is broadly satisfactory if all countries are green, it starts to falter when countries are orange or red. This most certainly is not living with COVID-19, but rather a reversion to the policy of eight months ago – closing borders across Europe to prevent virus transmission. Given that virus levels have increased in recent months while the restrictions on travel were in place, it is fair to say that it is time for a different strategy recognising the balance between virus risks and the mechanisms now available to manage those risks.

The traffic light policy as designed at this time also provides no certainty to passengers when making a booking. Member States can apply their own additional restrictions and are only required to provide 24 hours' notice.

We should look at and treat the situation dynamically. If air travel was a risk several months back, we now have protocols, protections and mechanisms in place to allow air travel to operate safely. Now that these are in place, and given we know much more about the virus, it is an unsustainable course of action to continue to advise against and restrict air travel. It is also a dangerous course of self-destruction, particularly for an island nation like Ireland. We need effective EU-wide coordination and harmonisation and the traffic light system, in its current format, does not provide for this.

COVID-19 Testing at Airports

So, what is required? An EU-wide system that replaces quarantine measures with airport pre-departure testing. Such a system could apply to all passengers or, more appropriately, to passengers travelling from a red or orange country. This type of testing strategy would be complemented by the traffic light information associated with each country so, for passengers travelling from a green zone, there should be no requirement for testing as by definition the incidence of COVID-19 in that country is so low that the risks are already minimised.

Those who are part of the aviation sector know that there is no such thing as a perfect solution. It is the reason why the industry is rooted in robust risk management and mitigation. Testing assesses the risk and mitigates it. It therefore stands to reason that testing should form an important part of the overall jigsaw of air travel COVID-19 protections.

Fundamentally, it is the view of the Irish Aviation Authority that the Irish Government's policy should favour a consistent approach to testing across Europe. We believe that a recovery for air travel is not possible without this policy (in the absence of a vaccine).

Testing as part of the re-opening of aviation is a solution that benefits from simplicity. It is easy to understand and would most likely be accepted by passengers; indeed, it would promote confidence amongst passengers and air crew. The requirement for passengers to continue to practice all appropriate COVID-19 precautions when travelling, such as face-coverings, social distancing etc., would, of course, remain.

We must also remember that when we consider travel within Europe, we are talking in the main about countries that have equally rigorous COVID-19 controls and protections in place. This is an important message in the effort to re-open our country. Where air travel has been portrayed as a risk in some quarters, we are actually talking about safe travel to destinations where there are strong COVID-19 protocols in place and in many cases where the actual risk of contracting the virus has been, or is lower than in Ireland.

Various industry bodies, airlines and airports have called on Governments to introduce COVID-19 testing to safely re-open borders and re-establish global connectivity. Many Governments are listening and there is now a trend towards recognising that testing is required to support a sustainable reopening. The benefits are clear – firstly it provides assurance around the risk of importing COVID-19 cases, secondly it supports economic activity and connectivity and thirdly it will play a key role in taking the aviation industry, and the thousands of jobs it supports, off life support.

The European Centre for Disease Prevention and Control view is that travel restrictions - and in particular quarantines - are of "questionable effectiveness" when community transmission is ongoing - which is currently the case in most of Europe.

The Irish Aviation Authority is not a medical or scientific body and so we will leave it up to others to research the most effective testing methodologies. We understand that there has been some work in this area at airport level and discussions have taken place with the Department of Transport. This area is developing rapidly and antigen testing now appears to provide a reliable, rapid and cost-effective solution. This type of test which involves a nasal, throat or saliva swab to detect certain proteins in the virus is now being implemented in airports across France as well as at Heathrow airport. However, we are speaking from a policy perspective, where from our central role in aviation in Ireland, we can see that if an urgent step like this is not taken soon, many parts of the Irish aviation industry will not survive. The airports representative body (Airport Council International) and an airline representative body (International Air Transport Association) have said that safely reopening borders without quarantine by using a coordinated approach to testing would boost the entire economy and be a revenue lifeline to airlines and airports. The Irish Aviation Authority agrees with this analysis. Until we replace quarantine measures with consistent Europe-wide testing, Europe's borders will effectively remain closed - unless you are travelling from eastern Finland to the toe of Italy, or other such "current" green routes.

However, like most things in the aviation sector, the true benefit, in terms of reopening air travel, will only emerge when all countries implement similar testing, based on a harmonised European system of rules with no additional local rules (e.g. quarantines) to dilute the harmonised approach. While testing should obviously never be seen as a replacement for the now standard preventative and protective measures, it clearly complements the normal good practices to provide a clear picture of a person's COVID-19 health status.

Conclusion

It is the Irish Aviation Authority's view that Ireland should take a lead in promoting a standard approach to airport departure testing and the removal of quarantine requirements across Europe. Yes, this would be brave leadership, but it is the type of Europe-wide, forward thinking diplomacy that Ireland is good at. It is also in the nature of Irish aviation to be at the forefront – just look at the number of Irish global aviation leaders. We need to leverage our globally recognised status as an aviation pioneer to promote a safe and effective mechanism of testing across Europe; after that we can focus on long haul destinations. But now is the time to rediscover our pioneering spirit, the spirit that established Ireland as a global aviation leader, a spirit which can now be used to get the aviation industry off its knees and play a key role in leading the economic fightback against COVID-19.

So, in conclusion

- The EU-wide traffic light system is a step in the right direction and we welcome the Government's intention to align with the rest of the EU, but it does not do enough, nor does it provide for close enough harmonisation to re-open aviation;

- Pre-departure testing at airports is required to ensure that each country is confident that it is not importing COVID-19 cases. The technology is there now; the next step is political will and an agreed standard approach;

- Many countries are moving in this direction so Ireland must not get left behind. In fact, Ireland should position itself as leader;

- Ireland is more reliant on aviation than any other European country. We should be taking a lead in this area and work with our EU colleagues to bring in an effective harmonised testing mechanism across Europe to remove quarantine restrictions which are economically damaging;

- Let's not concede to a long-term closure of our borders. Travel is not the enemy or a significant COVID risk, but rather has developed strict protocols to protect passengers. With the right planning, travel can be a key component in our emergence from the dark days of COVID-19;

- This approach would put living with COVID-19 into action; where we recognise that the virus is a risk but we implement measures, such as testing, which are scientifically proven and will provide a sustainable solution.

- Finally, after 8 months of watching the aviation industry in decline, it is the view of the Irish Aviation Authority that we need to take decisive steps now, providing positive signals to passengers, which will allow them to plan and make advance bookings. Businesses, jobs, connectivity and economic and social wellbeing at are risk. Now is the time to plan and act so that 2021 is not lost along with 2020.

My colleague and I will now take any question that the Committee has.