

Aer Lingus Opening Statement to Joint Oireachtas Committee on Transport and Communications Committee – 28th October 2020

Introduction

Thank you for the further opportunity to engage with the Transport and Communications committee on the critically challenging issues faced by the aviation sector.

Aer Lingus has previously outlined, both in July at the Special Committee on Covid-19 Response and again at our appearance before this committee on 7th October, the catastrophic effects the Covid-19 pandemic continues to have on the global aviation sector and the anticipated significant losses for the sector in 2020 and 2021.

You are all aware of the critical importance of the aviation sector for the Irish economy and its prospects for future recovery. You all know that the international businesses that headquarter in Ireland; that manufacture in Ireland; that carry out critical R&D in Ireland; that secure investment from their boards for Ireland; do so because we are a connected, progressive, business-friendly country.

Connectivity is key; we are an island nation, and so that connectivity can never be taken for granted. It is a key element of foreign inward investment and in helping our domestic businesses to grow and develop.

Now is the time to put a framework in place so that all businesses can plan for 2021. And fortunately, the key building blocks for that framework exist:

- Crucially, we know that air travel is safe. Aer Lingus, like all other airlines, have put in place measures in line with European Union Aviation Safety Agency (EASA) guidelines that very effectively mitigate the risk of transmission during travel. Indeed, a recent study by the International Air Transport Association (IATA) indicated that risk of transmission on board an aircraft is as low as 1 in 27 million.
- Secondly, the 'Traffic Light System' introduced by the European Council recently represents an important step towards ensuring greater harmonisation for safer travel across Europe, and I will address in more detail in a moment.
- Thirdly, new and more effective means of testing are being used globally, and their introduction in this country can increase the level of safe international travel which is critical to the Irish economy.

I won't reiterate today the critical contribution that aviation makes to the Irish economy which were covered in some detail in previous statements made by Aer Lingus to Oireachtas Committees. Today I will try to focus on the specific issues that the committee has asked Aer Lingus to address at this session.

European Council Decision

Safely increasing international travel is critical to the Irish economy. The decision at the European Council on 13th October aims to coordinate the approach to free movement in response to the COVID-19 pandemic through the adoption of the 'Traffic Light System'.

Aer Lingus notes that the wider aviation sector has been critical of the ultimate decision that emerged from the European Council. The Council recommendation on a coordinated approach to free movement in response to the COVID-19 pandemic, sets out some guidance to Member States but falls considerably short of what it was supposed to deliver when first proposed by the European Commission on 4th September: encouraging a restart of travel through effective coordination and proportionate, predictable and non-discriminatory measures.

Despite this assessment of the European Council decision, Aer Lingus has constructively shared an implementation approach with Department of Transport that could support safely increasing international travel.

Aer Lingus understands that the Government approach to implementing the European "traffic light" system of categorising countries according to controls over the COVID 19 virus will include following:

- Persons arriving from green list locations can enter the State without the requirement to restrict movement or undergo testing for Covid-19
- Persons arriving from orange list locations should have the option to disapply the requirement to restrict movement if they have negative test result of an appropriate pre-departure test
- Persons arriving from red list regions should have the option to disapply the requirement to restrict movement following a negative result from an approved Covid-19 test taken five days after arrival

The Government's proposed approach represents a moderately positive step forward towards facilitating increased safe international travel, which is critical to the Irish economy.

However, **it does need to evolve quickly**. Aer Lingus is actively engaging with Government on the full detail of the proposed implementation which needs to be finalised before 8th November.

Aer Lingus notes that the intention is to allow travel from orange coded countries / areas without a requirement to restrict movements on arrival if a pre-departure test is taken by passengers.

It is critical that if pre-departure tests are required initially for passengers travelling from orange coded areas, that it is based on a **rapid antigen testing solution**. Only a rapid antigen testing solution will facilitate a meaningful increase in safe international travel.

For passengers coming from 'high-risk' or 'Red' areas or countries, the European Council decision specifically enables the replacement of quarantine/movement restrictions by the introduction of a testing regime for passengers.

Aer Lingus welcomes the exemption for passengers with an essential function from the requirement to undergo restricted movement or testing while exercising this essential function and notes that this includes critical occupations, students and persons travelling for imperative family or business reasons. This exemption will allow passengers with an essential function to travel without restriction.

Aer Lingus believes that following the initial implementation of the measures, the fortnightly review process should quickly lead to a streamlining of the processes and allow a meaningful increase in safe international travel. This streamlining should lead to the following as the appropriate solution:

- a limited form of random rapid testing for passengers arriving from higher risk 'orange' coded countries or regions, and
- pre-departure testing for countries or regions classified as 'red'.

Aer Lingus believes that through the adoption of a co-ordinated and multi-layered risk mitigation approach, the level of safe international travel can be increased. The application of safety measures involves:

- pre-travel health declarations;
- mandatory use of face masks;
- enhanced cleaning on aircraft and in the airport environment;

- the use of state-of-the-art air filtration technology on board;
- the use of the ePassenger Locator Form (ePLF);
- the use of the Covid Tracker App and its integration with similar apps in other countries;
- agreed international travel protocols such as the European Councils 'Traffic Light' system.

It is based on all these risk mitigation measure in place, that **aviation requires a screening standard of testing and not a diagnostic standard.**

In summary, Ireland needs to implement the European Council's decision in such a way that the adoption of the 'Traffic Light System' makes a meaningful contribution to safely increasing the level of international travel.

Anything less will impede economic recovery for the state and jeopardize the levels of connectivity enjoyed by Ireland prior to the pandemic.

Testing at airports / Rapid Testing

I would firstly draw your attention to an IATA study which indicates that the inflight risk of transmission is 1 in 27 million. In 2020, where 1.2bn passengers have travelled by air, there have been only 44 cases of COVID-19 reported in which transmission is thought to have been associated with a flight journey and the majority of these cases happened before mask-wearing or biosafety measures were put in place.

Secondly, I would also note that in the current epidemiological situation, the European Centre for Disease Prevention and Control (ECDC) does not recommend that passengers should be systematically tested when crossing internal or external administrative borders.

Aer Lingus notes that the number of imported cases of coronavirus has been maintained at very low levels over the past number of months. The Health Prevention and Surveillance Centre (HPSC) report on 21st October highlighted that as few as 4 cases were imported in the previous 14 days – this represents just 0.05% of cases in this period. The HPSC have not reported this statistic in their 14-day incidence reports since 22nd October.

This highlights the effectiveness of the measures introduced by the European Aviation Safety Agency (EASA) Safety Protocol which formed the basis for the Irish Government's Aviation protocol published on 20th July.

Notwithstanding these points, Aer Lingus outlined in our opening statement on 7th October that through the adoption of a co-ordinated and multi-layered risk mitigation approach, the level of safe international travel can be increased. The introduction of testing is an additional layer to this risk mitigation approach.

The 14-day movement restriction advice currently in place acts as a de facto border closure and this is evidenced by the drastically reduced levels of flying by Irish airlines when compared to its European peers.

Removing the need for 14-day movement restriction is critical to safely increasing levels of international travel.

The European Council decision specifically enables the replacement of 14-day movement restrictions by the introduction of a testing regime for passengers arriving from 'Red' countries or regions.

In order to respect the differences in the epidemiological situation between orange and red areas the European Council decision requests Member States to act in a proportionate manner.

In this regard Aer Lingus has proposed to Government that applying a limited form of random rapid testing for passengers arriving from higher risk 'orange' coded countries or regions would be appropriate.

Aer Lingus has previously stated that the critical considerations in the establishment of a testing regime are that **it should not consume the capacity of the State's Covid-19 testing regime**; and should be scalable; affordable; and deliver results on a rapid basis.

Aviation requires a **screening** testing capability, not a diagnostic testing capability. The adoption of a rapid Antigen testing regime appears to be the most appropriate in this regard.

The ECDC risk assessment issued on 23rd October advised that:

*“while RT-PCR tests remain the operational standard for detection of ongoing infection, especially in cases where precision is key, antigen tests can also be used for this purpose. Rapid antigen tests (RATs) are becoming more readily available and are being increasingly used by Member States as a possible tool for rapid SARS-CoV-2 diagnosis. **RATs with acceptable sensitivity and specificity are now available in the EU.**”*

Aer Lingus would like to take this opportunity to highlight to the committee the following international developments in respect of Antigen Testing.

- Italy has introduced a testing requirement in September for arrivals from high risk or red areas that includes an antigen test within acceptable test standards
- On 18th Oct the French Minister for Transport announced plans to introduce rapid antigen testing at airports on departure to countries like US and on arrival from Red zone countries.
- On Oct 13th Germany's Robert Koch Institute (RKI) recommended antigen tests to complement existing molecular PCR tests. Germany has secured 9 million so-called antigen tests per month that can deliver a result in minutes and cost about 5 euros each. That would, in theory, cover more than 10% of the population.
- Several major European airports including Milan, Rome, Frankfurt, London and very recently Paris, are in the process of equipping themselves with antigenic tests to allow a rapid diagnosis.
- Alitalia are using and Lufthansa has announced plans to use antigen testing
- On 23rd Oct Austrian Airlines launched a trial program of rapid COVID-19 antigen tests in cooperation with its hub, Vienna Airport for flights to Berlin.
- There is therefore an urgent requirement for progress to be made in Ireland on the establishment of a rapid antigen testing regime to ensure adequate supplies can be sourced and secured in a timely manner.

Such a regime can represent a significant addition to the existing multi-layered approach to the management of risk by its application to passengers coming from 'high-risk' or 'Red' areas or countries.

In addition to the above, Aer Lingus has highlighted to the Department of Transport the benefits of mandating the download of the Covid tracker App for arrivals into Ireland.

Regional Operations

Aer Lingus has published its summer 2021 schedule which includes extensive schedules from both Cork and Shannon airports. The easing of international travel restrictions is obviously assumed in the

publication of our Summer 2021 schedule. Urgent progress along the lines we have outlined today now needs to be made, that is: the introduction of an appropriate testing regime to facilitate the implementation of the 'Traffic Light System' in Europe and the easing of travel restriction between Ireland and North America.

We have previously advised Oireachtas Committees in both July and earlier in October that the catastrophic impact of COVID-19 on the aviation sector has been compounded in Ireland by the implementation to date of the most restrictive travel policies in Europe and the failure to implement supports for the sector. **That needs to change now.**

Aer Lingus also expected that supports for the aviation sector consistent with recommendations of the Aviation Recovery Taskforce (published in July), relating to airport charges rebates / waivers and route supports was under active development and that such supports might be announced as part of Budget 2021. Such initiatives are key to protecting connectivity when route viability is in question.

Aer Lingus was disappointed that no direct measures materialised in Budget 2021. Aer Lingus now understands that the National Economic Plan due to be concluded later this year will provide for appropriate measures to safeguard strategic connectivity and the resilience of the aviation sector. Aer Lingus is concerned at this further delay.

Conclusion

As outlined - safely increasing international travel is critical to the Irish economy and the future of the aviation sector in this country.

Aer Lingus has been engaged with Government throughout the crisis, outlining clearly the supports being made available to the aviation sector across Europe and beyond. The travel policies applied in Ireland have throughout the crisis been more restrictive than in any other country in Europe and this has imposed a significant additional penalty on the aviation sector here.

The aviation sector in Ireland remains in the unenviable position of having had the most extreme restrictions in the European Union imposed upon it and at the same time having received the least in the European Union in terms of industry support. These two facts highlight why Ireland faces the most extreme crisis in the aviation sector.

The Government's own **Resilience and Recovery Plan** notes the following in respect of aviation:

- The need to keep airports and travel routes open
- That Ireland depends on airports for supply chains and economic activity

- The need to travel for essential reasons
- The significant employment and other direct economic impacts
- Aviation's strategic importance underpinning tourism and business.
- That rebuilding of the national economy has a dependence on aviation

Against this set of Government priorities, Aer Lingus requests that the Transport and Communications Committee support our call for the urgent clarity needed in defining the policy to be applied to realise the objectives for aviation and to clarify the supports that are to be made available to the sector in order to provide some certainty in what is a critically challenging time for aviation.

- In addition, Aer Lingus reiterates its request set out at our appearance before the committee on 7th October
- The urgent and complete adoption by Ireland of the co-ordinated approach to free movement across the European Union and European Economic Area that was proposed by the European Commission (i.e. the 'Traffic Light System');
- Advocating for the urgent implementation of a rapid affordable antigen testing regime to facilitate an increase in the level of safe international travel;
- The urgent implementation of the recommendation of the Aviation Recovery Taskforce as published in its Final Report on 10th July.

These issues are fundamental to allow airlines chart a route to recovery and plan with some degree of certainty.

The aviation sector is the engine of Ireland's economy.

Our economy needs **connectivity certainty**. This needs to be prioritised for 2021. Businesses located here need it; industries investing here need it; the regional airports need it; the tourism sector, and those that work in that key sector in every town and village in the country need it; and those working in the aviation sector need it. Rapid testing is key to delivering this certainty and will build consumer confidence for 2021.

Thank you for the opportunity to highlight these critical issues.

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