



Irish Air Line Pilots' Association

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Representing pilots since 1946

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Aileen Fallon
Special Committee on Covid-19 Response
Leinster House Dublin 2
D02 XR20

Dear Ms. Fallon,

Please find attached the Irish Air Line Pilots' Association (IALPA) submission to the Special Committee on Covid-19 Response on the topic of travel restrictions.

Our submission represents our assessment of current and possible travel restrictions in place and being considered by Government. We have drawn our observations and conclusions from material that has been published by the European Union Aviation Safety Agency (EASA), European Centre for Disease Prevention and Control (ECDC), World Health Organisation (WHO), and The International Civil Aviation Organization (ICAO).

We are concerned that the Irish approach may not be proportionate and discriminates against those from countries that have minimised the effect of the coronavirus and yet who must quarantine when arriving in our country.

The EU guidelines set out a comprehensive set of safety measures for aviation which include intensive cleaning and sanitisation of airports and aircraft, the wearing of masks, pre-flight screening, etc.

The IALPA objective is to ensure the safest possible environment for aviation whilst enabling the industry to restart in line with scientifically-led, evidence based criteria.

Should the committee wish for further documentation in support of our submission or indeed any other element of our participation please do not hesitate to contact me.

Yours sincerely,

Capt. Evan Cullen
President

Irish Air Line Pilots' Association

*sent via email and accordingly bears no signature

Member: European Cockpit Association (ECA) and International Federation of Air Line Pilots' Association (IFALPA)

Branch of: **FORSA**

**SUBMISSION TO THE SPECIAL COMMITTEE ON COVID-19 RESPONSE BY THE PRESIDENT OF
IALPA, CAPTAIN EVAN CULLEN**

Friday 29th May 2020

Introduction

1. On behalf of the country's airline pilots, I want to thank the Committee for giving us this opportunity to address the issue of the impact of national and international travel restrictions as a response to Covid-19.
2. First and foremost, we want to acknowledge the scale of the public health crisis that Covid-19 represents. We believe that the measures taken thus far have had a significant level of success in mitigating the effect of this virus on the Irish population. This scientific approach to tackling the virus has served us all well.
3. The Irish Air Line Pilots' Association (IALPA) represents approximately 1,200 pilots across the aviation industry in Ireland. We are also members of the European Cockpit Association (ECA) that represents over 40,000 pilots across Europe. We work in co-operation with our colleagues across Europe on a daily basis as we assess the effect that Covid-19 is having on our industry and as different states across Europe develop and update their processes and protocols.

Science-Based Action

4. We are concerned that, in Ireland, decisions are being taken now that do not take into account the scientific based guidance from the EU in order to relax some of the social restrictions, particularly the 14 day arrival quarantine requirement. IALPA are strongly in agreement with the introduction of the Passenger Locator Form.
5. The Committee should be aware of the *Joint European Roadmap towards lifting COVID-19 containment measures*¹ published on April 8th this year by the European Council that had at its core three principles, namely:
 - Action should be based on science and have public health at its centre;
 - Action should be coordinated between the Member States; and
 - Respect and solidarity between Member States remains essential.
6. As provided for in this Roadmap, the European Commission issued a communication on May 13th titled *COVID-19: Guidelines on the progressive restoration of transport services and connectivity*². The Commission principles state, amongst other things:

¹ https://ec.europa.eu/info/sites/info/files/communication_-_a_european_roadmap_to_lifting_coronavirus_containment_measures_0.pdf

² https://ec.europa.eu/info/sites/info/files/communication_freemovement.pdf

“measures which might restrict transport operations, as well as health-related protection and prevention measures, should remain limited, in their scope and duration, to what is necessary to protect public health. In addition to being proportionate, all measures should also be duly motivated, transparent, relevant and mode-specific, [and] non-discriminatory.”

7. This Roadmap provides for such approach. It builds on the expertise and the advice provided by the European Centre for Disease Prevention and Control (ECDC) and the Commission’s Advisory Panel on COVID-19 and takes into account the experience and outlook from a number of Member States as well as guidance from the World Health Organisation (WHO).

8. More specifically the Commission stated:

“Aviation has longstanding experience in the field of risk management in safety and security and is used to operating in a highly controlled environment. Regaining the confidence of passengers that aviation is a safe travel mode will be instrumental for exiting this crisis.”

European Guidelines

9. The Commission charged both the European Union Aviation Safety Agency (EASA) and ECDC to develop guidelines in relation to airline passengers that take into account safety management principles developed to ensure the safety of the European aviation system and set out a baseline aviation health safety protocol, for application across the EU.

10. EASA and ECDC jointly published their *COVID-19 Aviation Health Safety Protocol: Guidance for the management of airline passengers in relation to the COVID-19 pandemic*³ on May 20th and the latest version was released on May 21st. From our assessment, this document has been guided by the best and latest available scientific data and evidence, whilst also acknowledging that as the situation develops, the guidelines will be evaluated and updated so as to reflect the most up-to-date information.

11. It is notable that the Aviation Health Safety Protocol from EASA and ECDC does not mention mandatory quarantine for passengers whereas it goes into lengthy detail regarding intensive cleaning and sanitisation of airports and aircraft, the wearing of masks, pre-flight screening.

12. Aviation has always been the safest form of transport. Among the measures proposed are:

- Passengers only in terminal buildings;
- Social Distancing;
- Compulsory wearing of masks;

³ https://www.easa.europa.eu/sites/default/files/dfu/EASA-ECDC_COVID-19_Operational%20guidelines%20for%20management%20of%20passengers_final.pdf

- Pre-flight screening;
- The regular, thorough, cleaning and disinfecting of all aircraft, and
- High-efficiency particulate air (HEPA) filters in aircraft, through which the Coronavirus cannot pass.

Mitigating Risk Core to Aviation

13. Aviation at its core is a safety-based industry, assessing evidence and data to enhance safety and mitigate risk. It is also a resilient industry that has had to overcome significant challenges that have resulted in dramatic changes in the passenger experience over many years. Where such changes have been driven by good reason, all stakeholders across the industry, including passengers, have adapted to the new reality.
14. The outcome of the Covid-19 crisis is no different in this regard. IALPA accepts that as part of the protocols and processes necessary to manage the risk associated with this virus it will be necessary to bring in changes to passenger processing and handling at all stages of the journey. Crammed check-in areas, security screening, queues at boarding gates will all have to be reviewed as will the management of passengers onboard the aircraft.
15. The IALPA position is that Ireland's decisions in relation to travel restrictions must be an evidence-based, scientifically-led factual process guided by experts such as NPHEH but also by EASA and ECDC. It is with concern that we note comments such as a *"mandatory 14-day quarantine would be the 'greatest deterrent' in preventing non-essential travel, as opposed to a key factor in isolating the virus itself."*⁴
16. The decisions to remove or relax restrictions should be based on EU Guidelines. They should recognise the specific epidemiology of members states based on bilateral coordination between states.

Experience of Covid-19 in Aviation

17. The Committee has asked the IALPA for our view on several areas and it will be no surprise that we will make reference numerous times to the EASA and ECDC protocol.
18. The International Air Transport Association (IATA) in their most recent update⁵ reiterate the following as reported to them in an informal survey of 18 major airlines during January to March 2020:
- three episodes of suspected in-flight transmission, all from passenger to crew;

⁴ <https://www.breakingnews.ie/ireland/14-day-quarantine-to-deter-non-essential-travel-not-isolate-covid-19-says-nphet-1001796.html>

⁵ <https://www.iata.org/contentassets/f1163430bba94512a583eb6d6b24aa56/covid-medical-evidence-for-strategies-200525.pdf>

- four episodes of apparent transmission from pilot to pilot, which could have been in-flight or before/after;
 - no instances of suspected passenger-to-passenger transmission reported by the group of airlines; and
 - a much larger group of 70 airlines (representing half of global passenger traffic) also failed to identify any cases of suspected passenger-to-passenger transmission.
19. We must point out that the period in time referred to above represents a time where travel restrictions were not as severe as they currently are nor were public health measures as stringent across various modes of transport as we can see now and the spread of Covid-19 was progressing at a much faster pace than is seen currently.
20. It therefore follows that, with the correct protocols in place, travelling on board the aircraft represents a part of the journey with a low risk of transmission to the occupants.

Public Health Corridors

21. Protocols and regulation for travellers entering Ireland including the necessity to self-isolate or quarantine where necessary are only part of an overall strategy that needs to take into consideration all parts of the passenger journey. The International Civil Aviation Organization (ICAO) have developed the concept of Public Health Corridors (PHC) ⁶ and this type of concept is integral to enabling aviation to restart. The phases of the air passenger journey are dealt with by EASA and ECDC and are compatible with the development of PHCs.
22. Passenger Locator Forms (or other similar data) are an essential part of the toolkit for public health authorities as it has been widely shown that contact tracing needs to be comprehensive in order to successfully aid in slowing potential spread of Covid-19 should a passenger or crew member become symptomatic. Many airlines and government authorities already require such data about passengers travelling between countries – for example when travelling to the USA or Spain – so it can be demonstrated that these requirements are not onerous to implement.

Risk-Based Assessments

23. Based on such information, the route structure of airlines across Europe and the knowledge that some regions have been affected differently in terms of Covid-19, it should follow that an evidence-based approach should be taken to routes specific to those areas. There are thankfully many parts of Europe in which Covid-19 has been successfully tackled; we would submit that Ireland is amongst those. It is evident to us that passengers travelling between what are considered to be low-risk areas must therefore be treated differently to those who would intend travelling to or from what could be considered a high-risk area.

⁶ <https://www.icao.int/safety/COVID-19OPS/Documents/EB/EB20.30e.pdf>

24. Blanket restrictions such as those that have been mentioned by members of Government do not seem to tally with making a risk assessment based on evidence. It also seems to disregard that mitigation measures can be placed at all stages of the journey to ensure that those travelling are actually fit to do so and pose as low a risk as possible to public health.

Cognisance of Socio-Economic Impacts

25. The consequences of decisions being taken now and in the near future have a much wider effect than simply the public health effect; the knock-on economic impact is now coming to the fore as this situation unfolds. It is with respect to the Committee that we must draw their attention to this particular area as a consequence of national and international travel restrictions.

26. There are many stakeholders involved in this Committee meeting and it is evident that many, if not all, are reliant to one extent or another on a functioning travel and tourism industry. Whilst we must acknowledge that public health has to be at the forefront of decision making, the basis for those decisions must be sound and rational in order for travel and tourism to survive and thrive as we emerge from this pandemic.

27. Many thousands of jobs, including those of our members, depend on a healthy travel industry. Right now, aircraft are grounded, airports are silent, hotels are closed and tourist destinations are deserted. The impact of this level of inactivity on the Irish economy cannot be understated. Should measures be implemented that are not built on the best available evidence, Ireland's ability to recover from this sudden shock contraction will be severely compromised.

28. The latest IATA guidance issued on May 13th⁷ indicates that the level of air travel seen in 2019 may not return before 2023 and, as an island economy with a dependence on air travel, the knock-on effect could clearly be disproportionately felt here. The implementation of enabling measures, such as those put forward by EASA and ECDC, are crucial in allowing the travel and tourism sector to take advantage of opportunities as the recovery, in all senses of the word, gathers pace.

Ireland Out Of Step

29. We note and welcome the progressive reopening measures that are now being put in place across Europe in many tourist destinations⁸ including many places that were severely impacted by Covid-19. All of these governments have access to the same European protocols as Ireland yet the approach here is dramatically different.

⁷ <https://www.iata.org/en/iata-repository/publications/economic-reports/covid-19-outlook-for-air-travel-in-the-next-5-years/>

⁸ <https://www.irishtimes.com/life-and-style/travel/the-great-unlocking-top-holiday-destinations-welcome-back-tourists-1.4262333>

30. IALPA understands that these decisions will require monitoring to ensure their appropriateness but we have been unable thus far to understand why the Irish approach is so far removed from that of our European neighbours whom all face the same challenges.
31. We submit that with leadership coming from Europe in the guise of EASA and ECDC, Ireland can take a similar approach to that of other states. The use of protocols based on evidence and science can be used to both protect public health and enable the travel and tourism industry to restart and recover.
32. Government need to engage with the stakeholders to explore what can be done, when, and most importantly to ensure that all decisions are grounded in science and evidence.