



4<sup>th</sup> June, 2020

Ms Aileen Fallon  
Clerk to the Committee  
Special Committee on Covid-19 Response  
Leinster House  
Dublin 2, D02 XR20

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**Re: Invitation to make Written Submission**

Dear Ms Fallon

Thank you for providing me with the opportunity to submit the views of the Irish Aviation Authority (IAA) on the topic of travel restrictions to the Special Committee on Covid-19. As requested, the IAA's submission is being sent as a separate document, but I have nonetheless briefly summarised the IAA's position below.

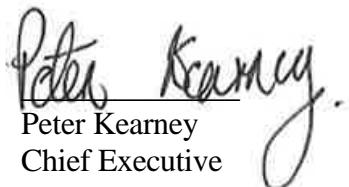
The Covid-19 pandemic has been particularly challenging for the aviation and hospitality sectors. Air traffic in Ireland is down over 85% in April and May 2020 compared to last year, with no clarity at this time of when any meaningful recovery will occur. Accordingly the sector needs a clear roadmap to return to normal operations, while any obstacles or barriers to recovery should be removed as soon as possible.

The IAA supports the guiding principles and recommendations identified by the European Union and the International Civil Aviation Organisation in addition to Operational Guidelines for the management of air passengers and aviation personnel in relation to the Covid-19 pandemic as identified by the EU's Aviation Safety Agency (EASA) and the European Centre for Disease Prevention and Control (ECDC). In particular, we welcome EASA's view that with the implementation of these guidelines, it will be "safe to fly again".

Further, the IAA is of the view that a risk based approach should be taken to the removal of quarantine requirements and other travel restrictions in place at present, which are disproportionately affecting aviation and preventing a recovery. Where the statistical risk of contracting Covid-19 is equivalent or lower to the situation in Ireland, we are of the view that restrictions could be reviewed.

Aviation is an important enabler for the Irish economy, as well as being a significant employer in its own right. The IAA recommends that it is a priority for Government to ensure that a fully functioning aviation sector is operational as soon as possible, in order to play its role in the stabilisation and recovery of the Irish economy.

Yours sincerely



Peter Kearney.

Peter Kearney  
Chief Executive

## Submission to the Special Committee on Covid-19 Response



### Introduction

- 1.1 The Irish Aviation Authority (IAA) welcomes the opportunity to submit its views on travel restrictions to the Special Committee on Covid-19 Response. The IAA has three core statutory responsibilities: safety regulation of Irish civil aviation, oversight of civil aviation security and the provision of air navigation services in Irish controlled airspace. Our comments are made in the context of the primacy of public health at this time and the importance of taking the appropriate steps to ensure that no undue risks are created which could impact on public health.
- 1.2 As the national safety regulator for aviation, it is important at the outset that the IAA differentiates between aviation safety in the conventional sense and health safety in the context of a public health pandemic. The IAA has been closely monitoring the industry specific guidelines designed to support the lifting of aviation specific restrictions in a more safe and sustainable manner. This includes, for example, EASA's (the European Union Aviation Safety Agency) Covid-19 Aviation Health Safety Protocol<sup>1</sup> published on 21 May, which contains recommended measures for aviation as the pandemic evolves, including personal protective equipment for staff, protective screens at airports, HEPA filters on board aircraft and appropriate social distancing where practical.
- 1.3 From a safety and operational perspective, the IAA has also been participating with other Irish stakeholders, including the Department of Transport, Tourism and Sport (DTTaS) on the National Facilitation (FAL) Committee which is focussed on ensuring the aviation industry is sufficiently prepared to enter recovery mode at an appropriate time.
- 1.4 Considering the range of guidelines from EASA, ICAO and the European Commission, it is critical that travel restrictions, and in particular the 14-day quarantine period, is not unnecessarily prolonged as this would have extreme adverse and disproportionate implications for passenger confidence and bookings over the medium term. Given the economic significance of the aviation industry in Ireland and across Europe, we are firmly of the view that activity needs to be restored as soon as the epidemiological situation can facilitate it.
- 1.5 We note the views of Mr. Patrick Ky (Executive Director of EASA) to RTE radio last week, where he stated categorically that it was "safe to fly again" and that implementation of the EASA guidelines by airlines and airports should allow for the re-opening of aviation across Europe. The IAA shares this view and has worked with Irish based airlines and airports to ensure that the appropriate measures, taking account of the EASA guidelines, will be implemented.
- 1.6 The aviation sector is a particularly important sector for the Irish economy. As a small export-led economy, there cannot be an economic recovery in Ireland without a fully functioning aviation sector. It is our view that it is important that Ireland does not continue the "shutdown" of aviation any longer than necessary and that like other European States, Irish aviation can be fully open from July onwards.

<sup>1</sup> [https://www.easa.europa.eu/sites/default/files/dfu/EASA-ECDC\\_COVID-19\\_Operational%20guidelines%20for%20management%20of%20passengers\\_final.pdf](https://www.easa.europa.eu/sites/default/files/dfu/EASA-ECDC_COVID-19_Operational%20guidelines%20for%20management%20of%20passengers_final.pdf)

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- 1.7 The financial implications of the ongoing pandemic are very evident to the IAA where our Air Navigation Services Division has seen an 85% reduction in air traffic. With IAA revenues directly related to air traffic, a significant deficit of income compared to costs has occurred. The IAA has, however, continued to provide a full service throughout the pandemic, including the facilitation of repatriated passengers and essential supplies. An unnecessary extension to the travel restrictions in their current form will greatly undermine the sustainability of this operation and will require further significant cost containment measures across our business.
  
- 1.8 In summary, the IAA is of the view that targeted risk-based measures throughout the aviation journey, including increased hygiene and limiting contact, will be sufficient to allow travel restrictions into and out of Ireland to be lifted from the beginning of Phase 3 on 29 June.

### **Travel Restrictions Entering and Exiting Ireland**

- 1.9 The IAA is of the view that an entirely risk-free environment in the presence of Covid-19 is not feasible but that risks can be greatly diminished through proportionate and risk-based measures that are regularly evaluated.
  
- 1.10 As the virus is likely to remain a public health concern until there is widespread availability of an effective vaccine, it is important that we can strike an appropriate balance of prioritising public health with the safe restoration of travel and the needs of our citizens.
  
- 1.11 The European Union has developed a common framework for a progressive restoration of travel, which continues to prioritise health but also considers the needs of citizens dependent on epidemiological assessments. The criteria have been designed to ensure a sustainable return to transport and tourism and contains protocols that focus on the safety of staff in addition to passengers<sup>2</sup>. Beyond the economic significance of the aviation industry, the European Commission has acknowledged that citizens will need a break from confinement and particularly those frontline workers who have ensured our safety, in order to see family/friends and enjoy a holiday.
  
- 1.12 The IAA agrees with the EU principles of restoring connectivity and specifically that transport services should be progressively resumed as a matter of priority, subject to the actual deployment of proportionate and effective measures to protect the health of transport workers and passengers. Of further relevance is the principle that safe mobility options should be identified instead of general prohibitive measures that lead to the paralysis of transport services within the EU.
  
- 1.13 From a passenger perspective, there is alignment between EASA's safety protocol and the EU's principle that staff should be provided by their employers with the appropriate level of personal protective equipment. There is also alignment from the perspective of protecting passengers whereby reasonable measures to limit contact between passengers should be taken. The IAA supports this position and has been engaged with the FAL Committee Members with a view to ensuring all stakeholders are aligned with respect to the appropriate measures to be implemented as the aviation sector begins to recover.

<sup>2</sup> [https://ec.europa.eu/info/sites/info/files/communication\\_transportservices.pdf](https://ec.europa.eu/info/sites/info/files/communication_transportservices.pdf)

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- 1.14 EASA has identified targeted measures that can minimise risk and provide an adequate amount of safety, while allowing services to continue. Irish stakeholders have a consolidated position with respect to these guidelines that are based on increased hygiene and limiting contact. At all times there will be physical distancing of 1.5 metres where possible and medical facemasks will be recommended in airports and on board aircraft. Furthermore, passengers will be issued with pre-travel advice before arriving at the airport, which will provide an opportunity to reference key developments and the introduction of any protocols as guidelines evolve.
- 1.15 There will be intense cleaning and disinfection carried out at airports and thermal screening will be implemented upon a national policy recommendation. Protective screens will be in place and physical distancing will be required during the check-in and boarding process.
- 1.16 Furthermore, queues for lavatories will be avoided on board aircraft, there is confirmation that HEPA filters are in place on non-ATR Irish aircraft, the use of face coverings will be required, seat allocation will be designed to support physical distancing where possible and there will be a reduced in-flight service. Similar risk-based measures will be in place for arriving passengers at airports, including physical distancing at Baggage Reclaim.

### Coordination with other States

- 1.17 The IAA agrees with the European Commission's principle that Member States should avoid a discriminatory approach insofar as it is possible when travel restrictions are lifted.
- 1.18 The EU has called on Member States to take actions in a coordinated and cooperative way, while noting that the use of equivalent standards and application of reciprocity as regards measures and their acceptance can be fundamental enablers of aviation in the EU and in the global context.
- 1.19 It is in this context that the guidelines published by ICAO at the beginning of June are particularly useful<sup>3</sup>. The ICAO guidelines provide a framework for addressing the impact of the pandemic on the global aviation transportation system and includes mitigations needed to reduce the public health risk to air passengers and staff in the aviation industry.
- 1.20 According to ICAO, the recommended measures, applicable to States, airport operators, airlines and others in the air transport industry, are designed to enable a consistent and predictable travel experience. They will also contribute to the efficient, safe, secure, and sustainable transport by air of an increasing number of passengers and cargo and will minimise the risk of Covid-19 transmission between and among these groups and the general public.

### Conclusion

- 1.21 The IAA is supportive of the guiding principles and recommendations identified by the EU, EASA and ICAO, and is of the view that these can strike an appropriate balance between facilitating the travelling needs of the public and prioritising public health at all times.

Irish Aviation Authority  
4<sup>th</sup> June 2020

<sup>3</sup> <https://www.icao.int/covid/cart/Pages/CART-Take-off.aspx>