

MEMORANDUM E (XX)

FROM: ROBIN SWANN MLA
MINISTER FOR HEALTH

DATE: 21 December 2020

TO: EXECUTIVE COLLEAGUES

In the course of our discussions last night I was asked to bring forward further advice on the position as regards travel.

The key issue for consideration is the current state of play as regards the variant — essentially whether or not it is currently present in NI. Travel matters most when overall prevalence of the virus in NI is lower than other countries, including the prevalence of any new variant. If the new variant is not already present and established in NI then measures to prevent or more likely delay introduction would be beneficial as would enhancement and adherence to NPI measures already agreed by the Executive. Similarly, if the variant is confirmed as being present in NI, then any measures to restrict travel will be less important.

The variant form of the virus is widespread in parts of England, especially the South East (where it may be the predominant strain), and may also be prevalent in Wales. The variant has been detected in smaller numbers in Scotland, and it is believed it is also present in NI, though not confirmed. It is likely that the variant is also present in many other countries given that it has been in circulation in England since at least September and the amount of international transit through London. In particular, given the extent of traffic between ROI and UK it is almost inevitable that the variant is present in ROI where it is unlikely to be easily detected given that little viral sequencing is performed.

In terms of context, in NI, travel associated cases of COVID-19 represent in relative terms a small percentage of overall cases (<1%). For example in the last two weeks of the approximate 6,000 new cases, only 23 have reported travel to the rest of the

UK. Rather more cases report having been in ROI in the same period. In this context, it is relevant to note the rapid upward trajectory in cases in ROI and the increase in R_t to around 1.5 – 1.6. This is a similar trajectory to that which has been observed in South East England and parts of Wales, although absolute prevalence in ROI remains relatively low.

In summary, the relative risk of travellers from the UK having COVID-19 is less than 1 in 100, and significantly less than that for the new variant. A precautionary approach does, however, have potential benefit from a public health perspective in the absence of definite evidence that the variant is already circulating in NI.

In conclusion, the key advice from the CMO and CSA is that:

- The absolute risk of travellers from the rest of UK having COVID is low, and even lower for the new variant
- That said, there would be merit in limiting or temporarily banning travel if the variant was not present in NI (and while its presence cannot be confirmed, there are strong indications that it is present). In the absence of definite evidence a precautionary approach is advised including possible consideration of limiting travel from the Republic of Ireland given the current disease trajectory and low level of genotype sequencing.

Other considerations

Based on the above, my view is that there is merit in moving now to place some restrictions on travel to and from Northern Ireland. However, this issue is more complex than simply, and bluntly, moving to ban such travel. There are significant issues in terms of the logistics of implementing such a move; and the unintended consequences of doing so.

LPP/LAP

LPP/LAP

In terms of unintended consequences, I have a number of immediate concerns:

- Banning travel may have serious adverse implications for the financial viability of, in particular, aircraft and ferry routes, resulting in the routes ceasing (even on a temporary basis). This could have profound implications for the supply chain of essential goods and supplies; and/or or may mean the Executive could face significant costs in subsidising such routes
- Financial compensation – the banning of travel may lead to claims on the Executive to cover costs already incurred by those affected.

We also need to recognise that, in terms of the volume of travel:

- travel to and from Northern Ireland may already have been significantly curtailed through measures taken elsewhere - including the position in other jurisdictions and our moves last night to reduce the permissible time period for the establishment of Christmas bubbles. A brief summary of the position in respect of England, Scotland, Wales and Ireland is set out on the attached Annex (from paper circulated last night by TEO); and
- there may be a risk of Irish travellers using NI as gateway to South – given flight ban on flights from UK to ROI.

Conclusion

Any decision to limit all travel, or all but essential travel, from the rest of the UK and/or ROI needs to be weighed against potential unintended consequences more generally.

If the variant is confirmed to be present in NI and circulating, then the benefit of restricting travel or a travel ban would be somewhat reduced. However, if the variant is not confirmed as currently circulating in NI then the benefit of restricting travel or a travel ban would be greater.

Colleagues will also wish to give thought to the proportionality of any such measure and whether the Executive's approach should be reflected in guidance and/or regulation. Consideration will also need to be given to wider public confidence in the response, impact on travel and trade among other issues should when making policy.

Based on the above, my view is that we should immediately issue guidance advising against all but essential travel between Northern Ireland and GB/RoI, with immediate effect – this should include asking all new arrivals to self-isolate for 10 days following entry to NI. Clearly such a move must be kept under regular review to ensure it remains appropriate.

In parallel we should urgently progress the following actions:

- provide a real sense of clarity as regards what is meant by "essential" – for example, my view is that it should cater for allowing NI residents currently away from home to return home
- undertake preparatory work on the form of any necessary changes to legislation to instigate such a ban, and the associated consideration of proportionality and human rights implications – so that we can move swiftly if we determine that such a move is necessary
- seek assurances from the UK Government that they will robustly enforce their own tier 4 restrictions, which will in themselves curtail travel to Northern Ireland;
- explore the use of locator forms for travellers arriving in NI; and
- explore the financial implications of instigating a more formal ban on travel

The Executive is asked to consider this issue, in the light of the points made in this paper.

ROBIN SWANN MLA
MINISTER OF HEALTH

