



Department  
for Transport

# Annex Aiii – Summary of impacts for The Health Protection (Coronavirus, International Travel) (England) Regulations 2020 – amendments

Completed by: Department for Transport

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# Fourth Review Point (21 September 2020)

## **Policy Summary**

1. On 8 June, measures came into force that required all passengers – except those specifically exempt – who a) arrive in England from outside of the Common Travel Area or b) arrive in England from elsewhere in the Common Travel Area where they have been outside of the Common Travel Area in the past 14 days to provide their personal and contact details, and travel information and to self-isolate for 14 days.
2. On 29 June, as part of the statutory review process of the Regulations, the Secretary of State for Health and Social Care agreed to the adoption of a risk stratification process, informed by assessments carried out by the Joint Biosecurity Centre (JBC), in consultation with PHE and the CMO, of the countries from which travellers should be subject to self-isolation requirements upon arrival in England.
3. It provides a means of assessment that, having regard to its limitations, enables Ministers to consider the public-health risk posed by arrivals from each country, and to determine whether international arrivals should be required to self-isolate. The methodology includes reference to point prevalence and an estimate of the proportion of the population that is currently infectious. As such, it also provides an approximate estimate of the probability that any traveller to England will be infectious.
4. Only persons arriving in England from ‘non-exempt’ countries; territories; and regions; or who have been in or transited through such countries; territories; or regions in the last 14 days, are required to self-isolate upon arrival. The list of exempt countries and territories continues to be monitored based on regular JBC and PHE analysis.
5. Since the third review point (24 August), there have been a number of changes to the list of exempt countries and territories reflecting a rapidly changing situation in the rate of COVID-19 transmission globally.

## **Changes proposed at this review point**

6. As part of the fourth review, amendments to categories of exemption in Schedule 2 have been proposed. One is a new exemption for advertising production professionals which will be incorporated into the existing exemption for film and television production; the others are a technical amendment to the elite sports exemptions and further updates to the list of specified competitions in Schedule 3. This document considers the likely impacts of the Regulations both in terms of their impact to date, and the small changes to the Regulations that are being proposed at this review point.

## **Current international and domestic context**

7. Global cases of COVID-19 continue to rise with daily new cases remaining at a high level. The World Health Organisation recorded just over 233,000 new cases in the previous 24 hours on 14 September. Some countries are seeing a rapid increase in cases and deaths, others have suppressed the virus but some of them are seeing new outbreaks as they relax non-pharmaceutical interventions (NPIs) and reopen their economies<sup>1</sup>. An increasing number of European countries have reopened or are in the process of reopening their borders to tourists from both within the Schengen region and outside<sup>2</sup>.

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<sup>1</sup> <https://www.who.int/dg/speeches/detail/who-director-general-s-opening-remarks-at-the-media-briefing-on-covid-19---22-june-2020>

<sup>2</sup> <https://www.dw.com/en/eu-agrees-to-reopen-borders-to-14-countries-extends-travel-ban-for-us-tourists/a-53986435#>

8. By the end of June 2020, the number of reported cases of COVID-19 in the UK had fallen below the levels at which the Regulations were first introduced. On 19 June 2020, the Joint Biosecurity Centre (JBC) recommended that the COVID-19 alert level should move from Level 4 (meaning “COVID-19 epidemic is in general circulation; transmission is high or rising exponentially”) to Level 3 (meaning “COVID-19 epidemic is in general circulation”). The Chief Medical Officers for England, Scotland, Wales and Northern Ireland reviewed the evidence and agreed with this recommendation to move to Level 3 across the UK<sup>3</sup>.
9. Wider social distancing measures were relaxed from 4 July as part of measures ‘to open up society and the economy’ but new measures will be introduced from 14 September preventing individuals from meeting with people from other households socially in groups of more than 6, following a sustained increase in COVID-19 case in England. This new measure will not restrict the ability of families to travel abroad – and they would be subject to the social-distancing requirements in force in which ever country they are visiting rather than UK regulations.
10. The UK introduced Travel Corridors on 10 July as a risk-based alternative to blanket self-isolation arrangements for arrivals from outside the common travel area. This has helped encourage some international travel over the summer, however flight traffic over August stabilised at around a 60% reduction when compared to 2019 levels, and international passenger numbers showed around a 90% fall in July when compared to 2019.

#### **Evidence of the impact of the existing policy**

11. The impact the policy is having on reducing the number of infectious travellers entering the wider UK population is uncertain. However, following changes to the list of countries exempt from the requirement to self-isolate since the third review period (which included for example Switzerland, Jamaica, and Czech Republic on 27 August 2020) and changes made prior to that, there were impacts on demand. It is reasonable to state that the policy is reducing the number of imported cases in absolute terms, by virtue of the reduction in the number of travellers entering the country from these destinations. As the destinations removed from the Travel Corridor list are those with higher rates of infection than the UK’s, it is also reasonable to assume that the policy is reducing the risk of imported cases in relative terms (the incidence per arriving traveller that is not required to self-isolate being lower than the domestic incidence more generally).
12. Preliminary findings from modelling carried out by the Animal & Plant Health Agency (APHA) for PHE suggest that in June, with no health measures in place for international arrivals, there would have been 377 infectious travellers per week entering Great Britain (GB) from the 25 countries that generate most inbound travel (in particular, 83% in ‘normal’ times). The analysis found that a 14-day self-isolation policy would have an efficacy of 78.3%<sup>4</sup>, thereby reducing the number of travellers entering GB, who pose an infection risk, to around 83 per week.
13. Further modelling by the APHA considered the 25 countries that accounted for 86% of the flights into UK airports in August 2020. The modelling estimates that there would have been 895 infectious cases travellers per week entering UK airports. At the time of the analysis (17 August 2020) the UK was implementing self-isolation for 12 out of the 25 countries and the analysis found that the 14-day self-isolation policy would have an efficacy of 87% (with the 12 countries with self-isolation requirements accounting for 779 of the 895 infectious travellers on arrival).
14. The analysis concludes that from the public health perspective the 14-day self-isolation measure is the most effective of the scenarios considered. The robustness of these estimates are a function of the study’s assumptions being correct, for example on the reduction of travellers due to COVID-19.

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<sup>3</sup> <https://www.gov.uk/government/news/update-from-the-uk-chief-medical-officers-on-the-uk-alert-level>

<sup>4</sup> Not 100% due to some travellers still being infectious after the 14 day self-isolation period.

15. The academic literature suggest that border control measures are effective in reducing the spread of infectious diseases. The impact summary, which accompanied the original regulations, included an overview of recent international academic evidence on the impact of border measures on the spread of COVID-19 and a systematic review of the impact on the Swine Flu (H1N1) pandemic as a point of comparison. Updated academic evidence was also summarised in an updated impact summary, which accompanied the updated regulations. This still constitutes the best source of evidence as to the effectiveness of the requirements set out in the Regulations. However, now that the policy has been in place for three review cycles, data is being gathered to permit a more detailed assessment of the impact of the regulations for the next review point.
16. The costs of the policy are outlined in HMT’s initial assessment of the measures and this assessment remains accurate in general terms. To mitigate these costs, the policy included sector-specific exemptions from the outset. To further mitigate costs, the country exemptions have been added to constrain the self-isolation requirement to those locations where the risk is greater than that of the UK. Further measures are under consideration to reduce the duration of self-isolation required through testing. An Islands’ policy was introduced on 7<sup>th</sup> September which allowed for the introduction of a regional approach. This policy change required people arriving in England from Crete, Lesbos, Mykonos, Santorini, Serifos, Tinos or Zakynthos to self-isolate for 14 days from the 9 September.
17. A range of factors may influence the impact and effectiveness of the measures contained within the regulations. These factors include, but are not limited to:
  - the rate of domestic COVID-19 transmission;
  - the rate of transmission in the countries<sup>5</sup> of origin;
  - the stringency of social distancing measures in the countries of origin (for example, whether infectious people are required to self-isolate and the extent to which this is enforced);
  - the degree of social distancing in place and susceptibility of the population domestically;
  - volumes of and changes in international travel in the future, related to international public confidence and travel restrictions in place in other jurisdictions;
  - levels of compliance with the measures by individuals arriving, and;
  - the ability of the NHS Test and Trace service to effectively follow-up suspected COVID-19 cases.

#### **Evidence of the impact of the existing policy**

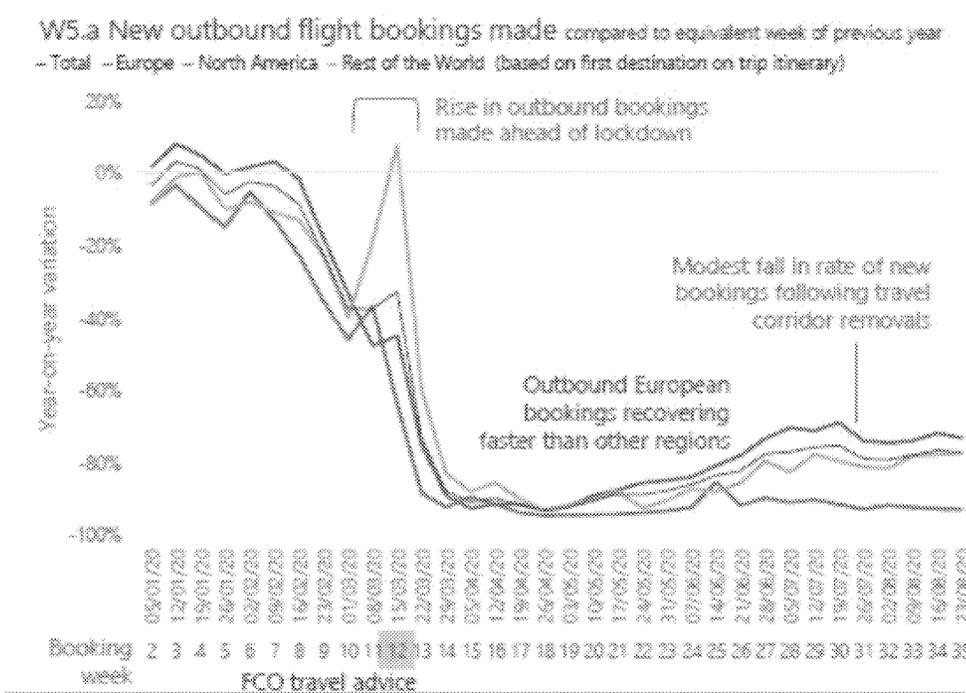
18. Disaggregating the impact of this policy on passenger demand from the impact of wider restrictions; reduced consumer confidence in international travel, and existing international travel restrictions is challenging. We cannot accurately say what the counterfactual would have been without these regulations.
19. If the FCDO blanket advice (to avoid all but essential travel) and requirements for all those travelling into the UK to self-isolate for 14 days, had remained in place then it is unlikely that passenger demand would have increased as much as it did during July and August.
20. Home Office figures show that international air passenger arrival numbers (outside the CTA) were up c. 550% in July-2020 (to 1.26 million passengers) when compared to June-2020. Though this is still around a 90% reduction of the number of passengers that arrived in July-2019.<sup>6</sup>

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<sup>5</sup> The word ‘country’ refers to both countries and territories throughout the document.

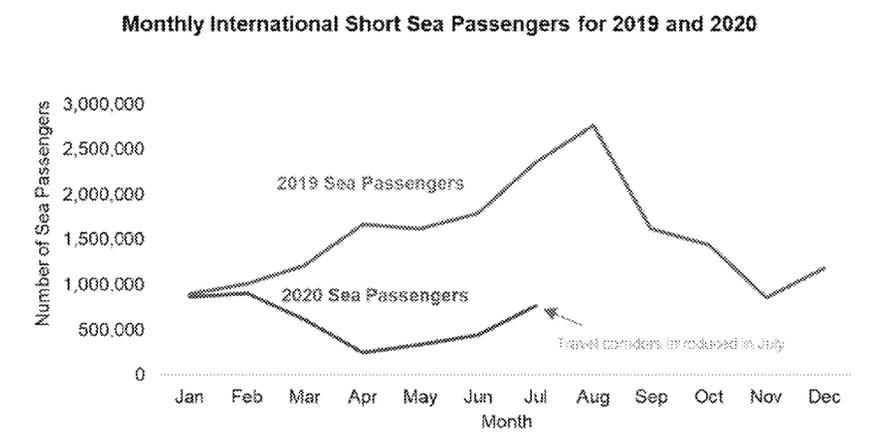
<sup>6</sup> <https://www.gov.uk/government/publications/statistics-relating-to-passenger-arrivals-since-the-covid-19-outbreak-august-2020/statistics-relating-to-passenger-arrivals-since-the-covid-19-outbreak-august-2020>

21. There has been an impact in the number of new bookings made which have subsequently increased following the announcement of a travel corridor policy in late June – this can be observed in the number of new outbound bookings made for overseas travel. Though we should note that bookings have been driven primarily by European travel (which is where most of the travel corridors have been).



22. Countries moving on and off the Travel Corridor list has, however, had an impact on passengers and the industry. As countries have been added, or removed, there has been a noticeable change in passenger volumes.

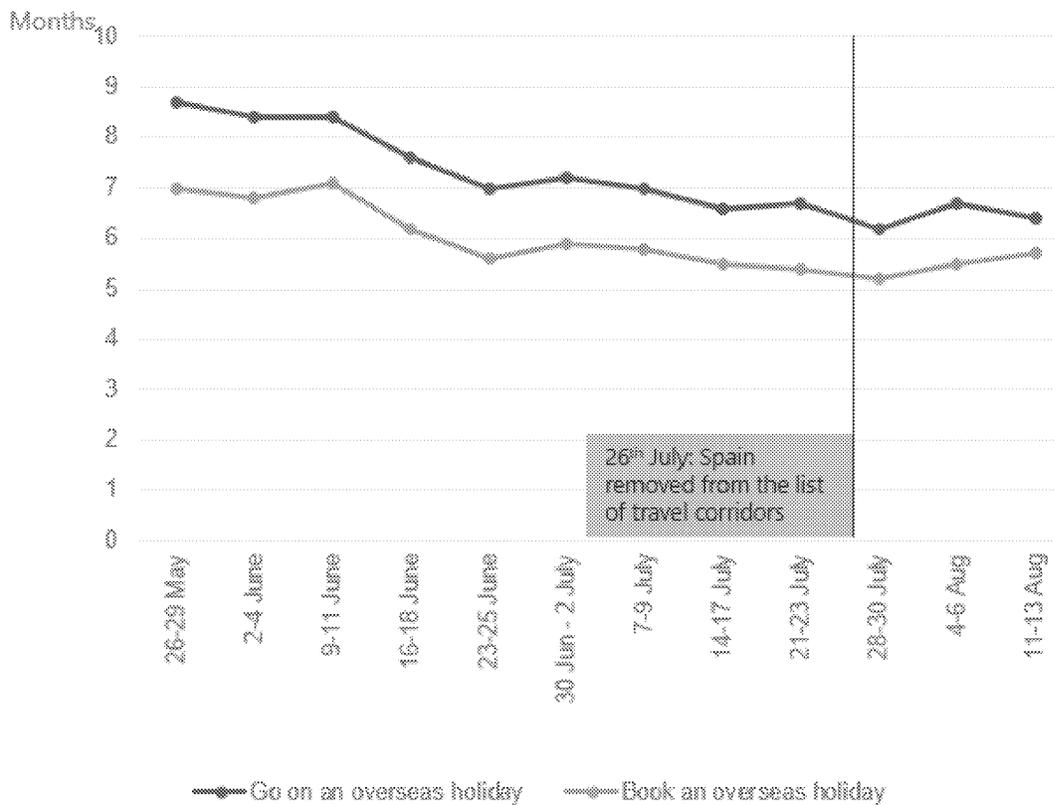
23. Published monthly international ferry sea passenger numbers (travel between the UK and France, Netherlands, Spain and Republic of Ireland usually making up the majority of volumes) were 75% below 2019 figures in June before travel corridors were introduced. In July, which captures the introduction of travel corridors, passenger figures rose and were 67% below 2019 figures, increasing at a faster rate than previous months.



24. One driver of reducing passenger demand is due to passengers being unwilling to self-isolate for 14 days, unwilling to travel due to the subsequent FCDO travel advice changing (and therefore any insurance becoming invalid) and operators no longer serving these destinations to comply with FCDO travel advice. A public attitudes survey carried out by ONS (n=1,420, 5th-9th Aug) shows that 73% would be unlikely or very unlikely to travel abroad on holiday if they had to self-isolate in their home for 2 weeks on return to the UK. In a separate Transport Focus survey (n=1,984, 3<sup>rd</sup> Sept) 48% said that worrying about getting a refund if they needed to would stop them booking a flight at the moment.
25. The chart below shows that the anticipated average times for booking and going on overseas holidays is around 5-6 months (this is much higher compared to domestic trips which are 3-4 months). Since the announcement about UK arrivals from Spain needing to quarantine for 14 days, anticipated average times for going and booking an overseas holiday started to show signs of increasing again, indicating some uncertainty to travel overseas.

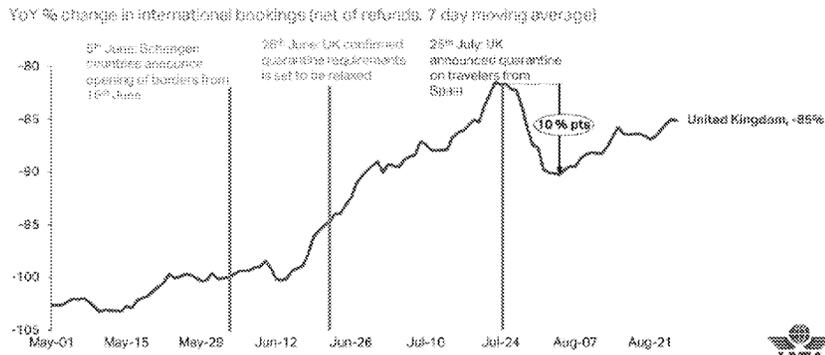
Average anticipated time (in months) before planning, booking or taking an overseas holiday and booking a flight

BVA-BDRC, n<500 for early waves, n=1000+ for waves from late May onwards, British adults



26. Recently published IATA has also indicated how the addition, and subsequent removal, of countries from the Travel Corridor list is influencing consumer behaviour. The chart below shows how the removal of Spain from the Travel Corridor list had a negative impact on international bookings. It should be noted, however, that there is likely to have been some displacement to other destinations that would reduce the net impact on UK flight traffic.

## Quarantine policy is adding to consumer uncertainty UK announcements of new restrictions discouraging air travel



### Other Impacts

27. In lieu of an extensive quantified analysis, a qualitative assessment of the costs, benefits and risks *in general* are presented in relation to the on-going changes to the list of exemptions. This is compared to a counterfactual of the existing policy, i.e. where border measures remain in place.
- Public health costs and healthcare costs** – We do not anticipate a large change in public health and healthcare costs due to lower risk countries moving onto, and higher risk countries being removed from the list of exempt countries and territories. If higher risk countries are removed from the list of exempt countries and territories this should to some extent mitigate increases in healthcare costs as a result of increased incidence of infection of arrivals from that country.
  - Economic and social costs** – The impacts on COVID-19 transmission of countries and territories being added and removed from the exemption list, impact the justification for the costs of the policy in public health terms. The additions and removals mitigate the risk of imported cases from countries with a high incidence of COVID-19 whilst allowing arrivals from lower risk countries to enter without self-isolating.
  - Environmental costs** – In the short term the marginal impact of some countries moving onto or out of the exemption list is likely to have a minimal impact on environment costs.
  - Domestic tourism, hospitality, arts and entertainment industries** – The impacts on domestic tourism of moving some countries onto the list of exempt countries, while others onto the list requiring self-isolation, is uncertain. Moving some countries onto the exempt list could generate inward tourism benefitting domestic tourism industries, but at the same time, it could also reduce the number of UK-based travellers who have been substituting domestic for international tourism, with unclear net impacts. In addition, COVID-19 spreading globally, and other NPIs in place, are likely to have an even more dominant impact on travel decisions than these marginal changes to the list of exempt countries.

- e. **UK-based businesses offering international travel and hospitality services** – 72% of GB residents would not go on holiday if it meant self-isolating for 14 days on return<sup>7</sup>. Recent polling does, however, suggest public support for the quarantine policy with 77% of respondents to a recent poll stating that they approve of the decision that those returning back to the UK<sup>8</sup>. Similarly, 68% said the current 14-day isolation period for UK arrivals from certain countries should be kept as it is<sup>9</sup>. Moving countries onto the list requiring self-isolation is expected to have a negative impact on the demand for these services, whereas moving countries off the list is likely to increase demand. However, the impacts of the continuing global spread of COVID-19, and the various other NPIs remaining in place domestically and internationally including FCDO travel advice, may still outweigh the impacts of this policy change on overall demand for international travel and hospitality services
  
- f. **Travellers and UK residents' wellbeing** – Adding new countries to the list of exemptions would increase societal benefits from the enjoyment of tourism, seeing family and friends who live overseas, the corresponding mental health benefits, and business opportunities that would be lost otherwise, whilst moving countries from being exempt would decrease these benefits associated with travel. The overall net impact is uncertain, but is expected to be small.
  
- g. **The UK services sector** – While the services sector is a significant part of the UK economy, we do not anticipate a sizable enough impact due to moving some countries off and on the exemption list, especially with new ways of working, such as video conferencing, increasingly reducing the need for travel for the services sector.
  
- h. **Foreign and Domestic Investment** – We do not anticipate a sizable enough impact due to moving some countries off and on the exemption list. Other factors, such as the anticipated future economic impacts of COVID-19, are likely to weigh more in foreign inward and domestic investment decisions than any current requirement to self-isolate. Some investment may be delayed until it is easier to travel, but, on balance, the changes are unlikely to have any considerable impact on investment medium/long term.
  
- i. **Supply Chains** – We do not anticipate a large enough magnitude impact on supply chains due to moving specific countries into or out of the exemption list. This is a secondary impact, and, due to possible changes in the exemption list in both ways, the direction of this impact is uncertain.
  
- j. **Freight** - We do not anticipate a large enough magnitude impact on freight services due to moving some countries into and out of the exemption list, as the impact on the demand for passenger services (which are crucial for the ro-pax freight business model) is expected to be minimal.
  
- k. **Labour movement** - The marginal changes of moving countries into and out of the exemption list is not likely to have any meaningful impact on the labour market. People's decision to move for work is unlikely to be affected by a 2-week self-isolation requirement.

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<sup>7</sup> ONS Opinion and Lifestyle Covid-19 survey, GB adults, 1640 26<sup>th</sup>-30<sup>th</sup> August

<sup>8</sup> YouGov poll, Sample – GB Adults – 3816, 14 August.

<sup>9</sup> YouGov, n=1947, GB adults, 20<sup>th</sup> Aug.

- I. **Demand for specific occupations** - The moving of a few countries into or out of the exemption list is unlikely to have a large enough magnitude impact on demand for specific jobs. The lack of demand for certain professions, such as airline pilots, will be more affected by a lack of demand for air travel due to COVID-19 and remaining NPIs in place domestically and internationally.

#### **The likely impacts of an amendment to the existing elite sports exemptions**

28. Athlete exemptions for certain sporting events are already provided for in the Regulations. The changes being made at this point are to allow UK athletes who have travelled to a non-exempt country, territory, or region for training camps and medicals to benefit from an exemption. The net impact of these changes is uncertain. Being able to organise the in-scope sporting events is likely to generate considerable economic benefits to the Arts, Entertainment and Recreation industry that was particularly hard hit by the COVID-19 outbreak and resulting NPIs put in place. At the same time, allowing athletes to enter England from non-exempt countries without being required to self-isolate could increase the risk of COVID-19 transmission slightly, potentially resulting in public health costs.

#### **The likely impacts of an amendment to the existing film and television production exemption to include advertising production professionals**

29. There is already an exemption for film and television production. This amendment will also allow advertising production professionals to benefit from the exemption. This exemption will be restricted to Directors, Directors of Photography and actors – and is therefore expected to be limited in impact.

#### **The likely impacts of an exception from the Regulations for people who have travelled to the UK for the purposes of work that is necessary for participation in the 4<sup>th</sup> National Lottery Licence Competition**

30. This exception would permit people, who have travelled to the UK for the purposes of work that is necessary for participation in the 4<sup>th</sup> National Lottery Licence Competition, to leave their place of self-isolation to undertake certain business activity related the national lottery competition. This would not exempt them from the self-isolation requirement in its entirety, therefore there is expected to be limited impact.

#### **Conclusion – Rationale for the amendments to the Regulations**

31. While it is not practical to all quantify costs and benefits associated with the Regulations and their amendments, this document does set out our further understanding of them.
32. In general, decisions to remove the requirement to self-isolate for passengers arriving into England who, in the last 14 days, have only been in (newly) exempt countries, is likely to generate economic benefits, including to the travel and tourism industry, whilst continuing to deliver (most of<sup>10</sup>) the public health benefits. In contrast, decisions to (re)establish the requirement to self-isolate for passengers arriving into England who, in the last 14 days, have been in non-exempt countries, is likely to generate public health benefits at some economic costs, for example to the travel and tourism industry. Overall, by reviewing the list of exemptions in accordance to JBC/PHE/CMO recommendations on an on-going basis, it is expected that the decisions to remove / re-establish the requirement to self-isolate for passengers arriving from certain countries would ensure that the economic costs associated with the restrictions are outweighed by public health benefits.
33. Also, while the net impacts of the changes to extend the list of sporting events covered by athlete exemptions are uncertain, it is possible that the economic benefits associated with these changes outweigh the resulting public health costs.

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<sup>10</sup> As there are newly diagnosed COVID-19 cases in almost all countries, adding countries to the list of exemptions is likely to *marginally* reduce the public health benefits of the current Regulations.

