



Re: ECDC Publications:

- *COVID-19 Aviation Health Safety Protocol Operational guidelines for the management of air passengers and aviation personnel in relation to the COVID-19 pandemic Issue*
- *ECDC/EASA Guidelines for COVID-19 testing and quarantine of air travellers –Addendum to the Aviation Health Safety Protocol.*
- *Risk of COVID-19 related to end of year festive season*

Via email to : anni-riitta.virolainen-julkunen@stm.fi (Chair of the Management Board of ECDC)

cc Ms, Andrea Ammon Director ECDC

Dear Anni,

As a member of the management board of European Centre for Disease Prevention and Control (ECDC) representing Ireland, I wish to congratulate the ECDC team for their timely scientific advices in relation to the control of the SARS-CoV-2 pandemic. However, I wish to outline serious concerns expressed among our national public health experts with recent ECDC publications which, in our opinion, contain inconsistencies in messaging that are not in accordance with evidence and Member State (MS) experience, particularly in relation to the role of international travel.

Since the commencement of the pandemic earlier this year, Ireland has advised its citizens to avoid all non-essential international travel. This is one element of a comprehensive control strategy which includes maintaining social distance, hand washing, respiratory and cough etiquette, use of masks in certain situations, and avoiding crowded poorly ventilated spaces. We believe it is extremely important to continue all these non-pharmaceutical interventions until a sufficient percentage of our population have received a safe and effective vaccine.

I have a number of specific concerns:

- On the 1st July the ECDC in conjunction with European Union Aviation Safety Agency (EASA)¹ published operational guidelines aimed at minimising the risk of SARS-CoV-2 associated with air travel. However, this document did not allude to the risk of importation of cases of SARS-CoV-2, into European countries, many of which had just emerged from a period of severe public health restrictions.
- The ECDC and EASA² have just recently published an addendum to this protocol which appears to ignore the significance of international travel as a potential amplifier of infection, especially in those countries that have achieved a low level of SARS-CoV-2 infection.
- There are inconsistencies in the guidelines which acknowledge that travel related virus introduction and tourism related spread within the EU contributed substantially to transmission

¹ *COVID-19 Aviation Health Safety Protocol Operational guidelines for the management of air passengers and aviation personnel in relation to the COVID-19 pandemic Issue*

² *ECDC/EASA Guidelines for COVID-19 testing and quarantine of air travellers –Addendum to the Aviation Health Safety Protocol.*

across and within countries during the early phase of the COVID-19 pandemic and a significant proportion of imported cases during the summer holidays when the total number of cases was low. However, it goes on to say that imported COVID-19 cases had little to do with the resurgence of COVID-19 in the summer of 2020.

- The document makes an assumption that 1% of travellers are likely to test positive. The citation provided for this assertion includes no mention of such an estimate. That notwithstanding, given the volumes of travel expected 1% represents a significant volume of importation.
- The document also states that the prevalence of SARS-CoV-2 in travellers is estimated likely to be lower than the prevalence in the general population. We would welcome underlying data/studies/modelling to understand how EASA/ECDC came to this conclusion.
- The guidance also makes reference to Member States admitting their own nationals and EU citizens and facilitating swift transit through their territories. We believe that Member States should be allowed the discretion of providing guidance on international travel to our citizens in accordance with our epidemiological situation.
- In addition, the publication³ *Risk of COVID-19 related to end of year festive season* again underplays the significance of international travel as a potential amplifier for transmission of SARS-CoV-2, particularly in relation to leisure travel over the coming festive season.

It may be the case that as this was a joint publication of the ECDC and EASA that the important public health message was diluted. However, ECDC's must maintain its core mission which is to identify, assess and communicate current and emerging threats to human health from communicable diseases and ensure a timely response, based on an adequate risk assessment with recommendations on appropriate public health measures. For this reason, it is considered important for ECDC to describe in detail the processes engaged in when producing guidance in conjunction with another agency. Ireland is seeking assurances from the management board of ECDC that internal processes are examined in order to ensure transparency and quality and avoidance of inconsistencies in public health messaging which has been demonstrated in recent publications and outlined in this correspondence. This is particularly relevant to the discussions on the proposal from the European Commission for the revision of the mandate of ECDC.

Yours Sincerely



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³ *Risk of COVID-19 related to end of year festive season*