



30th December 2021

Mr Stephen Donnelly TD
Minister for Health
Dept of Health
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Via email to Private Secretary to the Minister for Health

Dear Minister

The epidemiological profile of COVID-19 has continued to deteriorate very substantially since NPHET last met on the 16th December 2021 and is giving ongoing cause for significant concern as set out below. Your attention, in particular, is drawn to the increase in cases in hospital over the last three days – with levels of new daily cases in hospital not seen since last January.

The latest data on S-gene target failure data indicates that approximately 92% of cases are due to the Omicron variant.

Disease incidence has continued to rapidly increase in Ireland, with recent daily case counts substantially exceeding the highest previously reported in the pandemic to date. The 14-day incidence is now estimated at over 2,300 per 100,000 population. Disease incidence is elevated across the country. Incidence is highest and rapidly increasing amongst young adults aged 19-34 years old and is also particularly elevated and rising in those aged 16 to 18 years and 35 to 54 years old. The overall demand for testing and test positivity is high. Test positivity is high and rapidly increasing across almost all age groups and exceeds 50% in those aged 16-34 years.

Both the total number of confirmed cases and the average number of newly confirmed cases per day in hospital are high and increasing, with over 148 new cases in the last 24 hours and 619 in hospital this morning. The number of confirmed cases in ICU is also high. Just 49% and 40% of those currently in hospital and intensive care with COVID-19, respectively, have been fully vaccinated. Over 90% of people currently in hospital and intensive care with COVID-19 are there for the management of COVID-19; less than 5% of those currently in hospital or intensive care have ‘incidental’ (asymptomatic, non-infectious) disease.



COVID-19 mortality has remained relatively stable. This may rise further, given the high case counts and risk from Omicron, though booster vaccination may mitigate against this. There continues to be a significant number of outbreaks reported in settings with vulnerable populations.

In summary, the overall epidemiological situation in Ireland continues to give rise to significant concern.

Department officials met yesterday with NVRL and HSE colleagues, including the HPSC, AMRIC and those involved in the operational management of COVID-19 testing, to review current public health guidance in the context of the evolving epidemiological situation. Following significant preparatory work that has been undertaken in recent weeks on these issues, the following changes are now proposed in relation to community testing of symptomatic individuals and the isolation of cases with confirmed COVID-19 infection.

Community testing of those with symptoms of Covid-19

Current advice is that all those with symptoms of COVID-19 should self-isolate and seek a PCR test. In view of the very large volumes of disease now being experienced and to ensure best use of available testing capacity, to ensure rapid identification of SARS-CoV-2 and to support adherence with protective public health measures, it is proposed to activate surge measures as follows:

- Symptomatic individuals aged 4-39 years will be advised to self-isolate immediately and to undertake regular antigen tests. Anyone with an antigen test which detects the SARS-CoV-2 virus will be advised to seek a confirmatory PCR test. Those with repeated 'not detected' antigen tests will be advised to continue to self-isolate until 48 hours after their symptoms have resolved.
- Symptomatic healthcare workers will continue to be advised to seek a PCR test in the first instance.
- As per current advice, anyone with an underlying condition which puts them at higher risk of severe disease or anyone who has a clinical concern will be advised to contact their GP so that they can be prioritised for PCR testing if appropriate.
- All other symptomatic individuals (i.e., those aged 0-3 years and those aged ≥ 40 years) will continue to be advised to seek a PCR test in the first instance.

Antigen testing for those aged 4-39 years will be provided using the model currently in place i.e. home delivery from a central distribution point.

Given that a substantial level of current demand for PCR testing arises from those aged 4-39 years, and given the public health need to ensure that PCR capacity is protected for those most vulnerable to COVID-19 and those with more severe disease, it is important that the



above changes be communicated as soon as possible. This will likely have an immediate benefit in protecting PCR capacity because many individuals will already have a supply of antigen tests available to them at home.

As such, the HSE have indicated that communication of this new guidance for symptomatic individuals can commence tomorrow, Friday December 31st 2021. The HSE has advised that arrangements to provide for distribution of antigen tests can be operationalised from next Monday, 3rd January 2021.

Isolation period for those diagnosed with COVID-19

Current guidance in relation to self-isolation advises that adults who receive a positive PCR test result for COVID-19 should self-isolate for 10 days from commencement of symptoms (or date of PCR test if asymptomatic). They should only cease self-isolation after 10 days if they have been afebrile for the final five days of isolation. It is now proposed to amend this guidance to differentiate between those who have been boosted, either through receipt of three vaccine doses or through a combination of primary vaccination and recent infection, and those who have not, as follows:

- Those aged ≥ 13 years who are at least seven days post booster vaccination or those who have completed their primary vaccination course and have had Covid-19 infection within the previous three months, should self-isolate for a minimum of seven days from commencement of symptoms (or date of first positive test if asymptomatic) with exit after seven days only if symptoms have substantially or fully resolved for the final two of those seven days. Those exiting isolation after seven days will be advised that, from days 8 to 10 post onset of symptoms:
 - limit to the greatest extent possible close contact with other people outside their household, especially in crowded, enclosed or poorly ventilated spaces
 - to wear a face covering in crowded, enclosed or poorly ventilated spaces and where they are in close contact with other people
 - to take an antigen test before entering crowded, enclosed or poorly ventilated spaces and prior to having close contact with other people from outside their household
 - to avoid contact with anyone who is at higher risk of severe illness if infected with COVID-19
 - to work from home unless it is essential to attend in person
 - adhere to all other basic public health protective measures.
- All others aged ≥ 13 years who receive a positive PCR test result will continue to be advised to self-isolate for 10 days from commencement of symptoms with exit after ten days only if symptoms have substantially or fully resolved for the final two of those ten days.



- Current isolation requirements for young children (those aged 0-12 years) diagnosed with COVID-19 will continue in place.

It should be noted that no change is advised at present in relation to quarantine periods for those identified as close contacts of confirmed cases. It is noted that contingency arrangements have been put in place through the COVID-19 Senior Officials Group (SOG) to mitigate the impact of absenteeism on essential services. This will be kept under ongoing review.

Your early direction on the above advices would be appreciated as it will be important to communicate these proposed changes to the HSE such that they can begin to prepare for implementation as quickly as possible.

Finally, notwithstanding early data which suggests that Omicron may be less severe at the level of the individual who has been boosted, the extent to which the epidemic is continuing to accelerate means that there is still significant concern regarding the likely impact of such high case counts on health services (in particular, acute hospitals and intensive care) and other essential public services.

There is a particular concern that the nature and extent of social contact over the coming days, particularly over the New Year Period, will lead to a further deterioration in the disease profile and inter-generational spread of COVID-19. As such, it is of paramount importance that there are clear communications to the public on how to mitigate risk in the coming days, with the core message being that people should strictly limit their social contacts to all but the most essential, including avoiding, to the greatest extent possible, indoor mixing between households.

I will be happy to discuss further should you wish.

Yours sincerely

Dr Tony Holohan
Chief Medical Officer