## An Roinn Sláinte Department of Health Office of the Chief Medical Officer



14th April 2021

Mr Stephen Donnelly, TD Minister for Health Department of Health Block 1, Miesian Plaza 50-58 Lower Baggot Street Dublin 2

## Dear Minister

I refer to previous letters to you in my capacity as Acting Chief Medical Officer providing advice, as referred to in Section 38E of the Health Act 1947, in relation to the designation of states for the purpose of mandatory quarantine and the revocation of such designations; including letters setting out the approach and criteria advised by the Expert Advisory Group on Travel (EAGT) which provides analysis, data and recommendations to me, to assist me in consideration of the issues involved and provision of advice as foreseen under Section 38E of the Act.

As you will recall, the most recent recommendations of the EAGT and my advice in relation to same were set out in a letter to you dated 9<sup>th</sup> April 2021. I note that, following consideration of this advice and consultation with Government colleagues as required under the Act, you announced an intention to designate, as and from 15<sup>th</sup> April, certain of the states recommended by the EAGT and by me, namely: Bangladesh, Belgium, France, Italy, Kenya, Luxembourg, Pakistan, Turkey, the USA, Canada, Armenia, Bermuda, Bosnia and Herzegovina, Curação, Maldives, Ukraine.

I am writing to you now in the context of your regular review of the situation in states designated under Section 38E and in order to ensure that you have access to the most up-to-date data and analysis prior to designation of these additional states.

## Variants of Concern

A number of the states which you announced you intend to designate on 15<sup>th</sup> April were recommended for designation in my letter of 9<sup>th</sup> April on the basis of variants of concern (VOC), namely: Bangladesh, Belgium, Canada, France, Italy, Kenya, Luxembourg, Pakistan, Turkey and the United States of America.

In line with the EAGT agreed process, which considers ECDC, WHO, and European Commission guidance, VOC data is reviewed on a fortnightly basis, with this interval regarded appropriate from an epidemiological/public health perspective, reflecting the more sustained nature of VOC threat and slower pace of change of VOC data as compared to incidence data. For that reason, this letter solely considers a review of states which are intended to be designated on the basis of incidence, while noting that the position of countries designated based on VOC is being kept under review.

## Very high incidence and high incidence

The additional states which it is understood you intend to designate on 15<sup>th</sup> April – Armenia, Bermuda, Bosnia and Herzegovina, Curaçao, Maldives, Ukraine – were among the states recommended for designation in my letter of 9<sup>th</sup> April on the basis of either very high incidence (defined as a 14-day incidence greater than 500 per 100,000) or high incidence (defined as a 14-day incidence less than 500 per 100,000 and greater than 2.5 times Ireland's 14-day incidence) of COVID-19.

The recommendations based on 14-day incidence contained in the 9<sup>th</sup> April letter reflect ECDC incidence data from 8<sup>th</sup> April 2021, which is updated weekly. Bearing this in mind and in advance of your designation, the EAGT has reviewed the most recent available data, from alternative sources, in relation to all such countries and calculated a 14-day incidence, with individualised assessment in each case. The EAGT has conducted a similar review of the most recent available data in relation to all other states which are currently designated, following earlier recommendations to do so on the basis of very high incidence or high incidence.

Following individualised consideration of that most recent available data, the EAGT has confirmed that the states concerned – Andorra, Armenia, Aruba, Bahrain, Bermuda, Bonaire, Saint Eustatius and Saba, Bosnia and Herzegovina, Curaçao, Jordan, Kosovo, Kuwait, Lebanon, Maldives, Moldova, Monaco, Montenegro, North Macedonia, Palestine, Puerto Rico, San Marino, Serbia, Ukraine and Wallis and Futuna – continue to meet the 14-day incidence threshold of either very high or high risk of transmission (as defined above). For this reason, the EAGT remains of the view – and having considered the most recent available data, I concur – that there is known to be sustained human transmission of COVID-19 in these states; or a high risk of importation of infection or contamination with COVID-19 by travel from that state, within the meaning of Section 38E of the Health Act 1947.

In providing this information, the EAGT has noted that the sources used differ from that used for the purposes of the weekly ECDC review and that, in some instances, this data has not been fully validated and may be subject to revision. Nonetheless, having regard to the fact that the updated ECDC data will not be available until the afternoon of 15<sup>th</sup> April 2021, after you intend to have made the next round of designations, it was considered necessary and appropriate to identify and consider the most recent available data from alternative sources considered such as most appropriate in the absence of ECDC data, including and not limited to the COVID-19 Data Repository by the Center for Systems Science and Engineering at Johns Hopkins University<sup>1</sup>, Our World in Data<sup>2</sup> and Worldometers.<sup>3</sup>

This information and advice (additional to the data, information and recommendations provided to you in my previous letters) is provided to you in keeping with the requirements of the Health Act 1947, to inform your ongoing review of the situation in states designated under Section 38E of the Health Act 1947; and to ensure that your decision to designate additional states under that section continues to be informed by the best available and most recent data and analysis.

Yours sincerely

Dr Ronan Glynn A/Chief Medical Officer

IMC 343604

<sup>1</sup> https://github.com/CSSEGISandData/COVID-19

<sup>&</sup>lt;sup>2</sup> https://ourworldindata.org/explorers/coronavirus-data-explorer

<sup>3</sup> https://www.worldometers.info/coronavirus/