

14 April 2021

Dr Ronan Glynn
Acting Chief Medical Officer
Department of Health
Block 1, Miesian Plaza
50-58 Lower Baggot Street
Dublin 2

Review and confirmation of recommendations, for the purpose of up-to-date information to the Minister prior to designation

Dear Dr Glynn,

I refer to previous letters to you in my capacity as Chair of the Expert Advisory Group on Travel (EAGT) concerning the approach and criteria advised by the EAGT in fulfilling its mandate and in particular in providing analysis, data and recommendations to you, to assist in the performance of your role, as referred to in section 38E of the Health Act 1947, of advising the Minister for Health in relation to the designation of states for the purpose of mandatory quarantine and the revocation of such designations.

As you will recall, the most recent recommendations of the EAGT to you relating to designation of states and revocation of designations (following individualised country-specific analysis) were set out in a letter dated 9 April 2021. It is understood this analysis was taken into account by you in provision of advice to the Minister in a letter dated 9 April 2021.

It is further understood that the Minister has, following consideration of your advice, announced an intention to designate, as and from 15 April, certain of the states recommended by the EAGT namely:

Bangladesh, Belgium, France, Italy, Kenya, Luxembourg, Pakistan, Turkey, the USA, Canada, Armenia, Bermuda, Bosnia and Herzegovina, Curaçao, Maldives, Ukraine.

As requested, I am writing to you now (1) in the context of the regular review by the EAGT of the situation and (2) in order to ensure that the Minister has 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 the Minister has announced his intention to designate on 15 April were recommended for designation by the EAGT in our letter of 9 April on the basis of variants of concern (VOC), namely: Bangladesh, Belgium, Canada, France, Italy, Kenya, Luxembourg, Pakistan, Turkey, 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, 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 the Minister intends to designate on 15 April - Armenia, Bermuda, Bosnia and Herzegovina, Curaçao, Maldives, Ukraine – were among the states recommended for designation by the EAGT on 9 April on the basis of 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.

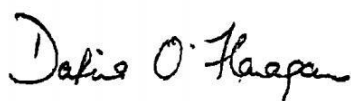
The recommendations based on 14-day incidence contained the 9 April letter of the EAGT reflect ECDC incidence data from 8 April 2021, which is updated weekly. Bearing this in mind and in advance of the Minister's designation, the EAGT has reviewed the most recent available data, from alternative sources, 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 a recommendation to do so on the basis of very high incidence or high incidence.

Following individualised consideration of that most recent available data and as set out in more detail in the annex, the EAGT can confirm 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 that there is known to be sustained human transmission of Covid-19 in these states with 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, we note 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 the 15 April 2021, after the Minister intends 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 University¹, Our World in Data² and Worldometers.³

I hope this information is useful to you, to ensure that your advice to the Minister of Health in relation to designation of states under section 38E of the Health Act 1947 continues to be informed by the best available and most recent data and analysis.

Yours sincerely,



Dr Darina O'Flanagan

Chair Expert Advisory Group on Travel

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

² <https://ourworldindata.org/explorers/coronavirus-data-explorer>

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