

**Excerpts from Memo: Health Rationale for DPMC's paper on 'Reconnecting New Zealanders: Omicron update'.**

**Proposed changes to pre-departure testing requirement**

15. As a result of the rapid spread of Omicron in many countries - and the impact of this on the availability of COVID-19 testing - there is a need to adjust pre-departure testing requirements for travellers to New Zealand.
16. Currently, the standard pre-departure testing requirement of a traveller undertaking a PCR test within 48 hours of beginning their journey to New Zealand only applies to around 80 jurisdictions where it is generally feasible for travellers to comply with those requirements. In addition, there are:
  - a. 105 jurisdictions which are exempt from the standard requirement, and subject to an alternative testing condition of a RAT or LAMP test within 24 hours of the traveller beginning their journey to New Zealand
  - b. 21 jurisdictions from which travellers are entirely exempt from the requirement.
17. There is a consensus among key agencies (including DPMC, the Ministry of Foreign Affairs and Trade, Ministry of Transport, the Ministry of Business, Innovation and Enterprise, and New Zealand Customs) that the current arrangements are not workable in the medium to longer term due to the fluid situation in many jurisdictions. A more durable approach is required, which retains the benefit of pre-departure testing in reducing cases at the border, but does not require frequent reassessment of the feasibility of different testing options in jurisdictions around the world.
18. DPMC is recommending in a paper to the RNZ Ministers' Group on 17 January 2022 that a consistent set of requirements should apply to travellers from all jurisdictions, except for a group of 21 jurisdictions which are currently exempt from PDT requirements. In effect, this would mean that like the 105 jurisdictions exempt, subject to alternative testing requirements, almost all travellers to New Zealand would be required to undertake either a PCR test within 48 hours of departure, a supervised RAT within 24 hours of departure or a supervised LAMP within 24 hours of departure.
19. It is recommended that you support the DPMC proposal

**I recommend that you:**

- d. Agree to DPMC's proposal that all travellers to New Zealand be required to undertake either a PCR test within 48 hours of departure, a supervised RAT within 24 hours of departure, or a supervised LAMP within 24 hours of departure.

## Excerpts from: Briefing: Requirements for the medium-risk pathway

### Summary

3. The Cabinet Social Wellbeing Committee (with power to act) agreed the broad settings for the medium risk pathway on 24 November [SWC-21-MIN-0200 refers], which were:
  - a. a negative pre-departure test within 72 hours prior to boarding.
4. The Ministry of Health (the Ministry) has reviewed the medium-risk pathway settings against operational changes required to respond to Omicron in the community, and recommends several changes to pre-departure testing and self-isolation requirements:
  - a. pre-departure testing requirements for travellers entering both the medium and high-risk pathways from all countries (except Very High Risk countries) must provide evidence of:
    - i. a negative RAT or LAMP test (completed within 24 hours prior to boarding) or
    - ii. a negative PCR test (completed within 48 hours prior to boarding).

### Recommendations:

- c. Agree that pre-departure testing (PDT) requirements for travellers are updated to allow evidence of a negative RAT or LAMP test (within 24 hours of departure) or a negative PCR-PDT (within 48 hours of departure) for travellers entering both the medium and high-risk pathways (except travellers from very High Risk jurisdictions).
- d. Note that the PDT changes will not apply to travellers who are currently exempt from PDT requirements, for example travellers from countries covered by the exemption notice in force under clause 27 A of the COVID-19 Public Health Response (Air Border) Order 2021.

### Context

#### Measures for the medium-risk pathway

1. A suite of measures for the medium-risk pathway have been recommended to mitigate the spread of COVID-19 into the community as we begin to open our border. These measures and the public health rationale include:

Measure	Public health rationale
Pre-departure testing (PDT)	<p>PDT aims to keep as much of the risk offshore as possible. It also aims to reduce the possibility of in-flight transmission, even in a situation where the risk onshore may present a greater risk.</p> <p>Keeping the risk offshore to the extent possible, and in a way that is proportionate, allows us to preserve our limited resources, especially in the event of widespread COVID-19 in the community. A Ministry review of PDT in early 2021, showed that it can reduce the burden of case arrivals at the border, in a global context where the prevalence of COVID-19 is rapidly increasing.</p> <p>PDT is the first opportunity to screen travellers for COVID-19. Use of a PCR test (within 48 hours of departure) or a RAT or LAMP test (within 24 hours of departure) are acceptable for PDT purposes.</p>

### Pre-departure testing

13. Prior to the emergence of Omicron, a PCR, RAT or LAMP within 72 hours was an acceptable form of PDT for travellers from most countries.

### Current pre-departure testing requirements

14. On 4 January 2022, due to the emergence of Omicron, the Acting Minister for COVID-19 Response agreed to tighten PDT requirements by limiting the type and time in which a test had to be taken. This means that currently all travellers arriving in New Zealand must have a negative PCR PDT within 48 hours of their scheduled departure of their first international flights.
15. However, there are 105 jurisdictions where obtaining a PCR test may be difficult or not possible. As such, an exemption was created for this group of jurisdictions to allow travellers to provide evidence of a supervised negative rapid antigen test (RAT) or a supervised loop-mediated isothermal amplification (LAMP) test taken within 24 hours of departure. An exemption was also created for 21 low-risk jurisdictions where testing capacity is limited.
16. These PDT settings are not feasible in the medium-to-longer-term due to the fluid COVID-19 situation in many jurisdictions as Omicron cases rapidly increase.
17. To meet New Zealand's PDT standards, all tests (including self-administered or at-home tests) must be processed by a laboratory recognised in the country of origin as authorised or accredited to conduct tests.
18. I therefore recommend a more durable and pragmatic approach to PDT and managing the risk offshore. This approach retains the benefit of PDT in reducing cases at the border but does not require frequent reassessment of the feasibility of different testing options in jurisdictions around the world.
19. There are several key components that determine the effectiveness of COVID-19 testing, including sensitivity and timeliness.
  - a. PCR tests are performed in a laboratory more sensitive than a RAT or LAMP, particularly early in the course of infection, however, the typically longer turnaround times means that it cannot be done close to the time of departure. With regards to PDT, this creates a longer period that the person could be exposed to COVID-19 after they've taken the test but before boarding the plane. PCR testing will also require many travellers to interact with symptomatic cases and contacts who are lining up in the same area to get a diagnostic PCR, depending on the country of departure.
  - b. RATs are less sensitive than a PCR or LAMP but can be conducted much closer to the time of departure, creating a much smaller window where people could be infected after having taken their test. Travellers taking RAT tests may be less likely to come into contact with symptomatic cases when getting tested.
  - c. LAMP tests can be performed in a laboratory or at point of care. It is also less sensitive than a PCR but has the advantages of being more sensitive than a RAT while still being able to be performed rapidly.

20. I therefore recommend that PDT requirements for travellers from all countries are updated to allow evidence of a negative:
- a. RAT or LAMP test (completed within 24 hours of departure) or
  - b. PCR test (completed within 48 hours of departure).

21. As shown below, there will be varying PDT requirements across all pathways:

Low-risk (isolation or quarantine-free) travel Pathway	Medium-risk (self-isolation) pathway	High-risk (managed isolation and quarantine) pathway
No PDT required	Either: <ul style="list-style-type: none"> <li>• PCR test within 48 hours of departure</li> <li>• supervised RAT within 24 hours of departure</li> <li>• supervised LAMP within 24 hours of departure.</li> </ul>	Either: <ul style="list-style-type: none"> <li>• PCR test within 48 hours of departure</li> <li>• supervised RAT within 24 hours of departure</li> <li>• supervised LAMP within 24 hours of departure.</li> </ul> From a Very-High-Risk jurisdiction: <ul style="list-style-type: none"> <li>• PCR test within 48 hours of departure from a government of origin approved laboratory.</li> </ul>

22. The timing of these updates should be aligned with the commencement of Step 1 of RNZ from 11 :59pm on 27 February 2022. Exemptions from PDT requirements for travellers from some countries (for example, relevant low-risk Pacific countries listed as Group 1 countries), would remain in place. However, the exemption notice will be revised to reflect that some Pacific countries are now no longer considered low-risk.
23. Expanding PDT options also provides more certainty that travellers will be reasonably able to meet New Zealand's requirements. There have been reports of global testing shortages of both PCR and RATs. Providing additional PDT options for travellers also ensure that there is a higher likelihood that travellers will be able to access a suitable testing option as supplies fluctuate or testing modes available in their location.

**Appendix 1: Requirements for the <medium Risk Pathways**

Pre-departure testing
Either: <ul style="list-style-type: none"> <li>• PCR test within 48 hours of departure, or</li> <li>• supervised RAT within 24 hours of departure, or</li> <li>• supervised LAMP within 24 hours of departure.</li> </ul>

**Excerpts from: Email correspondence RE: ODPH PDT preference**

---

From: Richard Jaine <Richard.Jaine@health.govt.nz>  
Sent: Wednesday, 13 April 2022 5:03 pm  
To: Sam Roberts <Samantha.Roberts@health.govt.nz>; PHP-Office of the Director of Public Health <PHP-Office.of.the.Director.of.Public.Health@health.govt.nz>  
Cc: Maria Cotter <Maria.Cotter@health.govt.nz>  
Subject: RE: ODPH PDT preference

Kia ora Sam,

We have discussed in ODPH about this and provide the following comments (others in ODPH may wish to correct or elaborate):

1. Remove PDT requirements for all general passengers and crew  
Our preferred option. Based on a number of factors including
  - Travel times to NZ – e.g. if testing 48hrs prior to travel and then travel takes 24+hrs then even if they were positive at the time of PDT, infectiousness may well be waning by the time they arrive in NZ
  - Is not a proportional response to any potential benefit provided to NZ.
  - We note that most countries we compare ourselves to have either removed already or signalled they will remove PDT soon (Australia, Singapore, Canada, UK, Denmark)
  - People should be advised not to travel if symptomatic
  - Other points already noted in the draft paper
2. Remove PDT requirements for air crew only  
No public health rationale to remove from this group, but not other groups
3. Remove PDT requirements for general passengers from Australia and the Pacific Islands  
May have some public health rationale due to shorter transit times and shorter visit times, but (as outlined in the paper) would be very difficult operationally.
4. Status quo

This is on the basis that there is very good advice/communications to travellers/arrivals if they become symptomatic to isolate and phone healthline for advice on testing (which would preferably be a PCR test to allow WGS).

I hope that helps.

Cheers,  
Richard

Released under the Official Information Act 1982

## Excerpts from: Memo: Review of the testing regime for air arrivals

### Current testing regime for arrivals

12. The current testing regime for arrivals, which includes asymptomatic pre-departure and post-arrival testing, was implemented when we moved to the testing on arrival pathway, which no longer required arrivals to self-isolate. The purpose of this regime was to:
- prevent people with active infection from boarding a flight and inadvertently infecting other travellers (who may go on to infect others in New Zealand and to 'slow the flow' of cases into the New Zealand community).
  - identify any 'overseas' or 'inflight' infected cases early; undertake PCR testing on positive RAT tests to contribute to whole genome sequencing (WGS) and early identification of new variants.

	Pre-departure testing	Post-arrival testing
<b>Quarantine-free pathway</b>	N/A	Not required, but voluntarily-reported RATs (community sourced) can be linked to border event records to monitor infections in recent arrivals.
<b>Testing on arrival pathway</b>  (also applies to the Self-Isolation pathway which is not currently in use)	<p>PCR test administered no more than 48 hours before the scheduled departure of first international flight to New Zealand, or</p> <p>Supervised <b>RAT</b> or supervised <b>LAMP</b> 24 hours before the scheduled departure of first international flight to New Zealand</p>	<p>Self-administered day 0/1 and day 5/6 <b>RAT</b></p> <p>If a RAT is positive, then a follow-up PCR is required at a GP or Community Testing Centre</p> <p>PCR samples are retained for several weeks, and may be Whole Genomic Sequenced (WGS) to identify new variants</p> <p><i>a proportion are sequenced as part of border surveillance</i></p>
<b>MIQ pathway</b>  (currently only active in a voluntary capacity)	<p>PCR test administered no more than 48 hours before the scheduled departure of first international flight to New Zealand, or</p> <p>supervised <b>RAT</b> or supervised <b>LAMP</b> 24 hours before the scheduled departure of first international flight to New Zealand</p>	Day 0/1 and day 5/6 <b>RAT</b> test

13. As shown in **Appendix A: International Comparison Table-Border -Settings**, many jurisdictions still require pre-departure testing (PDT) and forms of post-arrival testing. However, like us, other jurisdictions are also in the process of easing their border settings.
- Australia, Canada, and the United Kingdom have recently removed pre-departure testing requirements (this is not reflected in the table) and some jurisdictions provide the option of obtaining either a 'recovery pass' or PDT.
  - The United Kingdom and the United States have removed post-arrival testing for fully vaccinated arrivals, while others, such as Canada, France and Germany have varying forms of randomised arrival testing.

- c. During an officials' call this week, Singapore indicated that it was likely to remove PDT requirements this month but retain vaccination requirements.

### Pre-departure testing

#### *Original purpose of pre-departure testing*

14. Pre-departure testing (PDT) was originally implemented in late-2020 and early 2021 when all arrivals were required to enter MIQF for 14 days and undergo PCR testing. At that time, the benefits of keeping active cases out of New Zealand were extremely high: transmission of cases through MIQF and border workers was a major concern and detection of a single case in the community may have triggered regional lockdowns.
15. The number of cases were increasing internationally, and we were seeing an increased burden of cases in our MIQFs. An increased number of cases in MIQFs meant that there was an increased risk of in-facility transmission as well as infection of border workers - pre departure testing helped mitigate that risk by decreasing the number of infected travellers coming into New Zealand.
16. The rationale from moving away from the elimination strategy included that we had ongoing community transmission, high vaccination rates, and that SARS-CoV-2 has evolved to become more infectious. For example, Omicron is estimated to have entered New Zealand unobserved on no less than 15 separate occasions in December 2021 and January 2022. [source: ESR genomics reports]. Previous incursions were in the single digits and were all identified by contact tracing and epidemiological linkage. PDT and MIQ have therefore become a much less effective barrier to COVID-19 reaching the New Zealand community.

#### *Pre-departure testing has high costs*

17. There are both economic and social costs associated with the requirement to have a PDT. Economic costs are borne by travellers who may have to make alternative accommodation and flight arrangements with as little as 24 hours' notice if a PDT is positive. Economic costs also fall on the air sector and wider tourism industry as demand for travel to New Zealand is likely to be suppressed by a requirement that does not apply in an increasing number of other jurisdictions and introduces significant uncertainty to peoples' travel plans. The social costs of the requirement will likely include people missing weddings, funerals, and other significant events at short notice as a consequence of a positive PDT.

#### *Pre-departure testing limits the rights New Zealand Citizens have under the Bill of Rights Act*

18. Requiring New Zealand citizens to undertake a PDT limits the rights they have to refuse medical treatment under the New Zealand Bill of Rights Act (1990) and preventing New Zealand Citizens from travelling to New Zealand on basis of a positive PDT limits the right they have to enter the country.

However, if they are positive then they would need to isolate on arrival anyway under the current section 7 notice

19. For these limitations to be justified, there must continue to be a strong public health rationale for the requirement. This paper queries whether the changing international and domestic context along with the revised primary purpose of PDT continue to provide this justification from a public health perspective.

*Shifting primary purpose of pre-departure testing*

20. As New Zealand has now moved from the elimination strategy to a minimisation and protection approach, the original purpose for PDT outlined above no longer applies. No travellers to New Zealand are now subject to MIQ requirements.
21. In the current context, PDT's purpose is now to reduce the number of infected travellers boarding a flight and infecting others – passengers, aircrew, and people in the New Zealand community.
22. PDT helps to identify cases prior to travel and results in fewer cases being identified after arrival, but it does not prevent all cases crossing the border. Particularly with Omicron's short incubation period, people clear the virus relatively quickly so some cases detected via a PDT may not have been infectious by the time of intended travel, and some people detected post-arrival may not have been infectious at the time of the PDT.

*Pre-departure testing and new variants*

23. PDT may prevent some travellers infected with new variants from boarding flights to New Zealand, but not all, particularly if a new variant that emerges evades testing.
24. Consideration needs to be given to whether the imposition and cost of a PDT outweighs any reductions in travellers who may be infected with a new variant, whether it contributes significantly to our minimisation and protection approach and whether it is still a proportionate response.
25. Out of Scope

26.

*Short-haul flights and visits and the value of PDT*

27. PDT has less value in detecting cases offshore for individuals travelling on short visits and in minimising inflight transmission on short-haul flights. This is because:
- the risk of inflight transmission is greatest on long-haul flights, while the risk on short-haul international flights, including trans-Tasman flights and flights from the South Pacific is considerably less.
  - PDT for short haul visits (less than a week) may detect infection acquired in New Zealand prior to departure to the destination off-shore (e.g. people attending a one day meeting in Australia, or a long weekend or 5 day holiday).



- c. Additionally, we are very unlikely to detect a new variant from our Pacific neighbours as their outbreaks are mainly an extension of our New Zealand outbreak.

There are operational difficulties with pre-departure testing

(as they are opening up to tourists from around the globe + Aussie)

28. The Aviation Coalition which includes the major New Zealand airports, and the Board of Airline Representatives has advised us that around 30 to 50 passengers per flight are turning up at Australian airports to travel to New Zealand without an appropriate PDT or with a result that is slightly outside of the permitted timeframe. We have also heard that as other jurisdictions are removing the need for a PDT, it is becoming more difficult in some jurisdictions for travellers to find a provider to undertake this service. ✓
29. There is difficulty in requiring PDT from only certain jurisdictions, especially for hubs such as Australia. Whilst flights from the Pacific and Australia are of a similar time, Sydney and Melbourne provide a connection hub for long-distance flights (LHR-SIN-SYD-AKL, or DUB-MEL-AKL). This poses operational and communication difficulties given that some travellers may have commenced their journey outside of Australia and may still be subject to PDT requirement upon check-in, whilst others, commencing their journey in Australia, would not.

#### Options for the ongoing use of PDT

30. We have identified four options for the ongoing use of PDT:

- a. **Option 1: Remove PDT requirements for all general passengers and aircrew - ODPH's preferred option:** Under this option, PDT requirements would cease completely. This is ODPH's preferred option as:

- i. PDT does not provide public health benefits that contribute significantly to our minimisation and protection approach and is no longer a proportionate response.
- ii. The length of travel time to New Zealand means that a traveller tested 48 hrs prior to departure, and then travelled over 24 hours, if they were positive at the time of PDT, infectiousness may well be waning by the time they arrive in New Zealand.
- iii. most countries we compare ourselves to have either removed already or signalled they will remove PDT soon (Australia, Singapore, Canada, UK, Denmark)

However, ODPH advise that travellers should be advised not to travel if symptomatic.

If PDT requirements are removed, it may be challenging to reimpose them if considered necessary in the future. However, the ability to reimpose the requirement will depend more on the availability of providers to undertake the service in other countries than on our domestic settings. ✓

- b. **Option 2: Remove PDT requirements for aircrew only:** Under this option the requirement for aircrew to undertake a PDT every seven days would be removed. It would be up to the airlines to impose their own surveillance testing to meet their operational requirements. This would remove a significant point of contention for aircrew who are also subject to:

- i. testing requirements under the Required Testing Order
- ii. Arrival testing requirements in other jurisdictions, and
- iii. the operational policies some airlines have of testing before the first flight of a route commences.

Removing the PDT requirement for aircrew would reflect that incidence<sup>1</sup> of COVID-19 amongst aircrew is generally low due to the infection prevention controls they employ and that the risk of crew contracting COVID-19 on international layovers is now no greater than the risk of them contracting it in New Zealand. Under this option the requirement for general passengers to have a PDT would remain for the time being. However, ODPH do not consider that there is a public health rationale to remove the PDT requirement for crew, but not general passengers.

- c. **Option 3: Remove PDT requirements for general passengers from Australia and Pacific Islands.** ODPH has advised that the PDT requirement for arrivals from Australia and South Pacific nations could be eased as:
- i. most trans-Tasman flights and flights from South Pacific nations are relatively short (3-4 hours) which means there is a low likelihood of inflight transmission
  - ii. New Zealand now shares a similar risk profile to many other countries with high rates of COVID-19 in the community
  - iii. cases that would potentially be imported from Australia and the Pacific would make only a minor contribution to the number of our cases in the context of our current outbreak

While this option may have some public health rationale due to shorter transit times and shorter visit times, it would be very difficult to operationalise.

- d. **Option 4: Status quo.** Under this option, the current PDT requirements would continue.
- i1. If some form of PDT remains, a further review of PDT could be undertaken when the Surveillance Strategy and New Variants Strategy are finalised.

## Recommendations

I recommend that you:

1. **Note** that the current testing regime for arrivals, which includes asymptomatic pre-departure and post-arrival testing, was implemented when New Zealand moved to the testing on arrival pathway, which no longer required arrivals to self-isolate **Noted** ✓
2. **Note** the original public health rationales for pre-departure and post-arrival testing were as parts of the elimination strategy to prevent cases from travelling to New Zealand (pre-departure testing) and to catch every case that did travel to New Zealand (post-arrival testing). **Noted** ✓
3. **Note** the public health rationales for pre-departure and post-arrival testing are now limited to preventing inflight transmission on inbound aircraft (pre-departure testing) and identifying cases so individuals can seek the appropriate treatment, the detecting new variants entering New Zealand early (post-arrival testing). **Noted** ✓

4. **Note** that Australia, Canada, and the United Kingdom have recently removed pre-departure testing, and the United Kingdom and the United States have removed post-arrival testing for fully vaccinated arrivals, while others, such as Canada, France and Germany have varying forms of randomised arrival testing. **Noted** ✓

*Pre-departure Testing (PDT)*

5. **Note** that the Office of the Director of Public Health's (ODPH) preference is to remove all PDT requirements. **Noted** ✓
6. **Agree** to either *put the following options to Ministers for discussion:*
- a) Option 1: Remove PDT requirements for all general passengers and aircrew; or **Yes/No**
  - b) Option 2: Remove PDT requirements for aircrew only; or **Yes/No**
  - c) Option 3: Remove PDT requirements for general passengers from Australia and the Pacific Islands; or **Yes/No**
  - d) Option 4: Current PDT settings remain (PCR within 24 hours or a LAMP or RAT within 24 hours of first international departure (status quo). This option would be reviewed once the new variants plan and surveillance strategy are finalised. **Yes/No**

Released under the Official Information Act 1982