

# Briefing

## FURTHER ADVICE ON UPDATED PRE-DEPARTURE TESTING REQUIREMENTS

To Minister for COVID-19 Response (Hon Chris Hipkins)

Date	22/12/2021	Priority	High
Deadline	23/12/2021	Briefing Number	DPMC-2021/22-1168

### Purpose

This briefing provides further advice on changes to pre-departure testing (PDT) requirements for travellers crossing the Air Border from non-Quarantine Free Travel countries. The briefing recommends that evidence of a negative rapid antigen test (RAT) or loop-mediated amplification (LAMP) test, completed within 24 hours of departure, be acceptable for New Zealand's PDT requirements.

### Recommendations

- Note** that on Monday 20 December the Reconnecting New Zealanders Ministerial group agreed to amend the PDT requirements for travellers crossing the Air Border from non-Quarantine Free Travel countries by:
  - requiring that all travellers obtain a negative polymerase chain reaction (PCR) PDT (removing the ability for travellers to obtain a RAT or LAMP test); and
  - shortening the timeframe for obtaining a negative PCR-PDT from 72 to 48 hours;
- Note** that the Ministry of Health have advised that a RAT taken within 24 hours of departure may be a more effective PDT option than a PCR test taken within 48 hours of departure;
- Note** that requiring only PCR-PDTs would make testing less accessible (if not impossible) for travellers from some jurisdictions;

4. **Agree** to the PDT requirements for travellers crossing the Air Border from non-Quarantine Free Travel countries by:

4.1. **Option 1** – Only allow evidence of a negative PCR-PDT (within 48 hours of departure) for entry into New Zealand from 7 January and review the use of RAT and LAMP testing in mid-January (as part of advice to the Reconnecting New Zealanders Ministerial Group); or

YES  NO

4.2. **Option 2 (recommended)** – Allow evidence of a negative RAT or LAMP test (within 24 hours of departure), in addition to allowing a negative PCR-PDT (within 48 hours of departure), for entry into New Zealand from 7 January;

YES  NO


5. **Note** that if RAT and LAMP PDTs are not permitted, the Ministry of Health will provide further advice to the Director-General of Health on potential updates to the Gazette Notice outlining countries that are exempt from PDT requirements (because they are unable to meet New Zealanders PDT requirements);

6. **Note** the New Zealand Bill of Rights Act 1990 (NZBORA) implications in this briefing;

7. **Agree** to proactively release this briefing ~~subject to any appropriate redactions.~~


YES  NO

Please provide further advice on role of LAMP test - as either alternative to PCR, whether LAMP availability would reduce need for RAT exemption.



Alice Hume  
**Manager, Strategy and Policy, COVID-19 Group**

22/12/2021



Hon Ayesha Verrall  
~~Hon Chris Hipkins~~  
**Minister for COVID-19 Response**

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**Contact for telephone discussion if required:**

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**Minister's office comments:**

- Noted
- Seen
- Approved
- Needs change
- Withdrawn
- Not seen by Minister
- Overtaken by events
- Referred to

Proactively Released



# FURTHER ADVICE ON UPDATED PRE-DEPARTURE TESTING REQUIREMENTS

## Background

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1. On 6 December, the Ministry of Health (the Ministry) completed a public health risk assessment (PHRA) on the risk of Omicron. As part of this assessment the Ministry recommended that the PDT requirements for travellers are updated so that travellers be required to have a PCR test within 48 hours or a RAT within 24 hours of departure.
2. On Monday 20 December, the Reconnecting New Zealanders Ministerial Group (Ministerial Group) agreed to several changes to border settings in response to the Omicron variant, including:
  - a) Amending the PDT requirements so that all travellers crossing the Air Border from non-Quarantine Free Travel countries by:
    - i) requiring that all travellers obtain a negative PCR-PDT (removing the ability for travellers to obtain a negative RAT or LAMP test); and
    - ii) shortening the timeframe for obtaining a negative PCR-PDT from 72 to 48 hours.
  - b) Removing the current ten countries from the Very High-Risk (VHR) list including Botswana, Eswatini, Lesotho, Malawi, Mozambique, Namibia, the Seychelles, South Africa, Zimbabwe and Papua New Guinea [DPMC-2021/22-1143 refers].
3. Cabinet has also agreed in-principle to delay the reopening of the border to New Zealanders and other eligible travellers arriving from Australia to align the reopening with a greater proportion of the population having received a booster shot, which will likely be at the end of February 2022 [CAB-21-MIN-0558 refers].
4. In consultation with Cabinet, you have also agreed that the time for the required-stay in MIQ should be increased from seven-days (with three days self-isolation) to 10 days.

## Situation update: International changes to PDT requirements in response to Omicron

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5. International PDT requirements for the purposes of travel are changing quickly in response to the Omicron variant, and we expect there will be further changes as jurisdictions adjust policies in the face of uncertain context. Several jurisdictions are managing increasing COVID infection rates, including jurisdictions where a large number of New Zealanders travel from such as the UK and USA.
6. A number of key jurisdictions are requiring shorter turn-around times for PDT for international travel. The combination of reduced turn-around times for PDT and increasing domestic demand presents capacity challenges for testing clinics in many countries.



7. There are expected to be significant delays for access to testing and test result turn-around times in Australia, Canada, Europe, the United Kingdom and the United States. There is a high likelihood that it will not be possible for some travellers to fulfil New Zealand's pre-departure testing requirement in these jurisdictions, even where every reasonable attempt is made by the traveller to do so.
8. There are also equity implications related to using limited medical consumables in countries affected by domestic outbreaks to assist the departure of foreign nationals. In some cases, governments have taken steps to address this. In Canada, for example, some provincial health authorities have indicated that existing testing capacity for both obtaining samples and processing in labs will be preserved for essential workers and to protect the most vulnerable. This impact will be compounded in low- and middle-income countries, often without the prospect of government intervention.

### **Public health advice is that allowing RAT and LAMP testing close to the time of departure will provide an adequate level of assurance for travellers**

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9. Given the objective of keeping Omicron out of New Zealand until a greater proportion of the population has the opportunity to obtain a booster shot, seeking to improve PDT requirements ensures a cautious approach is maintained.

*The Ministry consider that a RAT taken within 24 hours of departure may be a more effective PDT option than a PCR test taken within 48 hours of departure*

10. Public health advice from the Ministry is that a PCR test (within 48 hours of departure) or a RAT (within 24 hours of departure) provides an adequate level of assurance that a traveller is not infected with COVID-19 at the time of testing [DPMC-2021/22-1143 refers]. Research to date has highlighted that RAT tests are expected to continue to be able to be used to detect SARS-CoV-2 in the presence of the Omicron variant<sup>1</sup>.
11. The Ministry of Health have outlined that there are several key components that determine the effectiveness of COVID-19 testing, including sensitivity and timeliness:
  - a) **A PCR test** is more sensitive, 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 time period that the person could be exposed to COVID-19 after they've taken the test but before boarding the plane.
  - b) **A RAT** is less sensitive, 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.
12. A further issue with requiring PDT to be PCR only is that this will 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. This is less likely to occur for RATs.

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<sup>1</sup> However, a small number of manufacturers of RATs have identified problems and have withdrawn their tests



13. On balance, the Ministry of Health consider that this may result in the 24-hour RAT being a more effective option than a PCR test taken within 48 hours of departure.

*All PDTs must be processed by an approved laboratory*

14. 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, in order to meet New Zealand's PDT standards. Self-administered test (such as a RAT) that has not been authorised by an approved laboratory will not meet New Zealand's current PDT standards.

*RATs are commonly used PDTs in other jurisdictions*

15. RATs are common PDTs used in other jurisdictions, including by a number of New Zealand's key partners such as France, Germany, Singapore, United Kingdom and United States. These tests are generally required within 24-48 hours of departure. Canada and Australia currently do not allow RATs for PDT purposes.

## **Requiring only PCR-PDTs would make testing less accessible for travellers**

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16. Requiring travellers to obtain a PCR test in a shortened timeframe and removing the option for travellers to obtain a negative RAT or LAMP test is likely to make testing less accessible for many travellers.
17. The shortened PCR-PDT timeframes make it more difficult to obtain a negative test even in jurisdictions that have laboratories which can process PCR tests. For example, some testing clinics are not open in the weekend or are overwhelmed by domestic and international demand, which can make it difficult for travellers to meet the shortened timeframes for a PCR test. This is relevant in New Zealand also, where there is only one laboratory that that can process PCR-PDTs within 48-hours.
18. In addition, removing the ability for travellers to obtain a RAT or LAMP test reduces the testing options available to travellers which are offered for many travellers across the world, particularly as a number of international airports have the ability to conduct RATs.
19. Because of the distance to New Zealand (often involving connecting flights), if travellers cannot get a test and result in time, the impacts for them can be significant. If travellers miss their flight, rescheduling options can be complex and people could become stranded.

s9(2)(h)

This could also have flow on implications for travellers needing to enter MIQ on arrival.

*Initial analysis indicates that further updates will be needed to the list of jurisdictions that cannot meet New Zealand's PDT requirements*

20. The Ministry of Foreign Affairs and Trade (MFAT) has provided preliminary data from the Post network on countries and places where the PDT requirements may be difficult or impossible to fulfil, including for some key partners. For example, initial analysis that jurisdictions such as Angola, Cambodia, Canada, Malawi, North Macedonia, South Korea



and most Pacific countries may not be able to meet the 48-hour PCR-PDT testing requirements.

21. Low-risk Pacific pathway jurisdictions are currently exempt from PDT as there is little public health rationale for requiring testing from these COVID-19 free jurisdictions [SWC-21-MIN-0227 refers]. Many of these Pacific jurisdictions also have very limited testing capacity, which should be preserved for domestic surveillance testing and in the event of an outbreak. It is important that these exemptions remain in place.
22. MFAT has advised that there are limitations to their ability to assess complete data on the feasibility of PDT. These include variability within a country; equity issues related to using limited medical consumables in developing countries to assist the departure of foreign nationals; as well as the fast-moving nature of COVID-19 conditions.
23. MFAT's Consular network can provide consular assistance to New Zealanders whose travel plans are significantly impacted by the new PDT requirements, however there are limitations to the assistance MFAT can provide. For example, MFAT cannot organise or pay for alternative tests, reschedule flights or book places in MIQ for travellers. These risks will need to be managed.

*Engagement with the aviation industry has also highlighted that obtaining a negative PCR-PDT may be difficult for some travellers*

24. Engagement with the aviation industry through the Board of Airline Representatives of New Zealand has highlighted that while the 48-hour PCR testing has proved workable in many situations, there will be cases where, despite their best efforts passengers are not able to meet the requirements. This is particularly the case if the test must be a PCR test. Airlines prefer supervised RATs as they are faster, cheaper and easier for travellers to use, and can be used more frequently.

## **Options for making updates to PDT requirements**

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25. We consider that there are two options for making updates to PDT requirements:
  - a) **Option 1** – Only allow evidence of a negative PCR-PDT (within 48 hours of departure) for entry into New Zealand from 7 January and review the use of RAT and LAMP testing in mid-January (as part of advice to the Reconnecting New Zealanders Ministerial Group); or
  - b) **Option 2 (recommended)** – Allow evidence of a negative RAT or LAMP test (within 24 hours of departure), in addition to allowing a negative PCR-PDT (within 48 hours of departure), for entry into New Zealand from 7 January;
26. Option 1 could make it difficult for travellers from some countries obtain a negative test in the shortened timeframe and could lead to an additional number of countries being exempt from PDT requirements. Option 2 would make testing more accessible for travellers entering New Zealand and would provide a sufficient level of assurance from a public health perspective.



## **The PDT exemptions list can be updated for jurisdictions where it is not possible to obtain a PCR- PDT within 48 hours**

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27. If you consider that RAT and LAMP PDT should not be permitted, updates may need to be made to the current PDT exemption notice which outlines jurisdictions which cannot meet the PDT requirements. Jurisdictions that are exempt from New Zealand's pre-departure testing requirements are agreed by the Director-General of Health and included in a relevant Gazette notice.
28. There are exceptions to the current PDT requirements, which include:
- a) Travellers from locations where New Zealand's pre-departure testing standard is not available (who are required to obtain a certificate from a medical practitioner) and travellers from Afghanistan;
  - b) Travellers from Antarctica, Norfolk Island and most Pacific Island countries (who are not required to obtain a medical certificate prior to travel due to the low COVID-19 risk in most of these countries);
  - c) Travellers who cannot take a test for medical reasons or because they are under two years old
  - d) Foreign diplomatic and consular personnel.
29. A list of the jurisdictions that are currently exempt from PDT requirements are included in Appendix 1. These exemptions will remain in place under the updated settings.

*Advice will be provided to the Director-General of Health on updates to PDT exemptions if RAT and LAMP testing is not permitted for travellers*

30. It is difficult for officials to confidently ascertain exactly which countries would need an exemption from PDT requirements (which may lead to unreasonable displacement of New Zealanders) as:
- a) the availability of testing cannot be identified for all countries;
  - b) the locations of all New Zealanders cannot be identified; and
  - c) the global COVID-19 situation continues to change rapidly and it is not possible to maintain a real time list.
31. Further analysis needs to be done to determine which countries may need to be exempt from PDT requirements. The Ministry of Health, in consultation with MFAT, will provide further advice to the Director General of Health on updates to the PDT exemptions prior to the commencement of the new PDT provisions.





<b>Attachments:</b>	
<b>Appendix 1:</b>	<b>Current exemptions for pre-departure tests</b>

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# APPENDIX 1

## Current exemptions for pre-departure tests

Current exemptions for pre-departure testing requirements include the following groups of travellers:

- **Travellers from the following locations where New Zealand's pre-departure testing standard is not available (who required to provide a medical certificate):**
  - Albania
  - Belize
  - Dominica
  - Kenya
  - Laos
  - Montenegro
  - Myanmar
  - Slovenia
  - St Kitts and Nevis
  - St Vincent and the Grenadines
  - Tajikistan
  - Turkmenistan.
  
- **Travellers from the following locations (that are not required to provide a medical certificate):**
  - Norfolk Island — if Norfolk Island is the only place in Australia that a traveller has been within the past 14 days, a pre-departure test is not required.
  - Afghanistan – travellers are required to be transferred to MIQ for a day 0/1 test
  - Antarctica
  - the Cook Islands
  - Federated States of Micronesia
  - Fiji
  - Kiribati
  - Marshall Islands
  - Nauru
  - New Caledonia
  - Niue
  - Palau
  - Samoa
  - Solomon Islands
  - Tokelau
  - Tonga
  - Tuvalu
  - Vanuatu.
  
- **Travellers that cannot take a test due to medical reasons (who required to provide a medical certificate)**
  
- **Children under 2 years of age (24 months)**