



Briefing: Options for updating COVID-19 vaccination requirements for arrivals to New Zealand

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	Action sought	Deadline
Rt Hon Jacinda Ardern Prime Minister	agree/disagree to recs	28 June 2022
Hon Dr Ayesha Verrall Minister for COVID-19 Response		

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Minister's Office

Status:

Signed

Withdrawn

Comment for agency

Attachments: No

Briefing

Options for updating COVID-19 vaccination requirements for arrivals to New Zealand

To: Rt Hon Jacinda Ardern Prime Minister; Hon Dr Ayesha Verrall Minister for COVID-19 Response			
Date	23/06/2022	Security Level	[IN CONFIDENCE]

Purpose

1. The purpose of this briefing is to outline the options for updating COVID-19 vaccination requirements for entry to New Zealand.

Executive Summary

2. On Monday 10 May 2022, Ministers agreed to extend COVID-19 vaccination requirements at the air border until September 2022, with an additional review in July 2022.
3. In response to the Director-General of Health indicating a preference that travellers are 'up to date', with their vaccinations based on the definition of 'up to date' in their country of origin, Ministers directed officials to provide further advice on options for updating the vaccination requirement for international arrivals.
4. Our approach to the border has changed substantially throughout the COVID-19 pandemic, as the relative risk posed by international arrivals has decreased. Our domestic strategy, and extant measures, have enabled us to move towards being 'open by default', with few COVID-19 specific barriers to travel.
5. Earlier in the year, Reconnecting New Zealanders Ministers considered a number of principles which underpin New Zealand's strategic approach at the border. Key aspects included a proportionate and justifiable approach at the border that supports simplicity, stability, and predictability for travellers, while aligning with international norms in order to capture economic and social benefits of an open international border.
6. Vaccination requirements for entry to New Zealand were first introduced on 1 November 2021, and currently apply only to arrivals at the air border.¹ The current objective of requiring travellers to be vaccinated as a condition of entry is to reduce the severity of serious illness from COVID-19, and therefore to minimise the potential burden on the health system to mitigate the risk of potentially displacing access for New Zealanders, including the ability of Māori - who have been disproportionately impacted by COVID-19 - to access health care.

¹ New Zealand citizens, residence class visa holders and Australian citizens ordinarily resident in New Zealand are not subject to vaccination requirements. There are also other exceptions, including for those aged 16 years and under, refugees arriving in New Zealand for the first time, citizens of Afghanistan who arrived before 12 December 2022, certain arrivals from Ukraine, and those with evidence from a medical practitioner certifying they should not be vaccinated for medical reasons.

7. To meet the vaccination requirements for entry to New Zealand travellers must have evidence of having completed a primary course of an approved COVID-19 vaccine. Travellers are not currently required to have a booster.
8. Because vaccine induced immunity to Omicron wanes considerably after four months, a booster dose provides protection, particularly against severe outcomes.
9. Officials have considered a number of options for implementing a strengthened vaccination requirement at the border, including by requiring travellers to be 'up to date' with their vaccinations, by using either the recommended COVID-19 vaccination schedule in New Zealand, or the recommended schedule in their country of origin or a maximum interval since last dose.
10. Weighing up against the significant operational, accessibility and equity implications of an additional requirement, alongside the key guiding principles for our approach to the border outlined above, DPMC, border agencies and the Ministry of Foreign Affairs and Trade do not, on balance, recommend that further changes to vaccination requirements be implemented at this time. Officials do, however, see value in strengthened public health messaging to strongly encourage all travellers to New Zealand to be 'up to date' with all their vaccinations.

Recommendations

1. **Note** that on 10 May 2022, you agreed to maintain the COVID-19 vaccination requirements at the air border until the end of September 2022, with an additional review in July 2022 [DPMC-2021/22-2106];
2. **Note** that the current primary objective of COVID-19 vaccination requirements for entry to New Zealand is to reduce the severity of serious illness from COVID-19, and therefore to minimise the potential burden on our health system;
3. **Note** that evidence now shows that vaccine induced immunity wanes considerably after four months and that a booster is needed, particularly to provide protection against severe outcomes;
4. **Note** that the Director-General of Health has indicated a preference that travellers to New Zealand are 'up to date', with their COVID-19 vaccinations which could be based on the definition of 'up to date' in their country of origin, or could specify a third (booster) dose if available in that country;

5. **Note** that we have considered options for implementing a strengthened vaccination requirement at the border, which include:
 - 5.1. **Option 1** – Require travellers to be 'up to date' with their vaccinations, based on either:
 - 5.1.1. Option 1a - the recommended schedule in New Zealand; or
 - 5.1.2. Option 1b - the recommended schedule in their country of origin; or
 - 5.2. **Option 2** – Require travellers to have received their last primary dose or booster dose within a prescribed number of days prior to departure to New Zealand ('maximum interval since last dose' approach);
 - 5.3. **Option 3** – Maintain the current vaccination requirements (status quo);
 - 5.4. **Option 4** - Maintain the current vaccination requirements and strengthen communications to encourage all incoming arrivals to be 'up to date' with their vaccinations.
6. **Note** that the longevity of these options is dependent on the Air and Maritime Border Orders still being in place;
7. **Note** that the Ministry of Health has shifted to the use of the phrase being 'up to date' with COVID-19 vaccinations domestically which could include a full primary course plus a booster dose if a person is due and eligible;
8. **Note** that while the number of COVID-19 related hospitalisations from international travellers is not expected to be high, the Ministry of Health has advised even a marginal increase in the number of travellers experiencing severe outcomes from COVID-19 could place additional pressure on the health system over winter;
9. **Note** that the definition of 'up to date' with COVID-19 vaccinations is likely to differ in each country; that vaccination certificates generally do not include whether an individual has met a country standard; and that any new requirements are likely to add further complexity for border agencies and the traveller journey, which will have flow on impacts for airlines and other travel operators;
10. **Note** that while accessibility to boosters is increasing internationally, access is uneven and that there would be social, economic, and bilateral relationship implications with updating our vaccination requirement, including limiting access to travellers from the Pacific that would need to be managed, for example through exemption processes;
11. **Note** that on balance, when weighing the likely effectiveness of an 'up to date' vaccination requirement (options 1a and 1b) against the

significant operational, accessibility and equity implications, it would be difficult to justify the introduction of any further changes to the vaccination requirements;

12. **Note** that while it would also be difficult to justify a 'maximum interval since last dose' (option 2) vaccination requirement, although challenging and with equity issues, it would be operationally feasible for agencies to implement;

13. **Agree** to either:

13.1. maintain the current vaccination requirements and strengthen communications to encourage all incoming arrivals to be 'up to date' with all their vaccinations (option 4 - recommended);

YES / NO

or

13.2. instruct officials to report back with a recommendation on the most appropriate maximum interval between last primary dose or booster dose, and departure to New Zealand (option 2: 'maximum interval since last dose' approach)

YES / NO

14. **Agree** to share this briefing with Reconnecting New Zealanders Ministers for their information;

YES / NO

15. **Agree** to proactively release this report, subject to any appropriate withholding of information that would be justified under the Official Information Act 1982.

YES / NO

		
Alice Hume Head of Policy & Strategy	Rt Hon Jacinda Ardern Prime Minister	Hon Dr Ayesha Verrall Minister for COVID-19 Response
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Background

11. On Monday 10 May 2022, Ministers agreed to maintain COVID-19 vaccination requirements at the air border until September 2022, with an additional review in July 2022. Ministers also agreed to open maritime borders to foreign-flagged vessels (such as recreational and cruise vessels) on 31 July 2022 and extend COVID-19 vaccination requirements for cruise and recreational passengers. Other vessels (such as cargo and fishing) continue to be subject to testing on arrival, but not vaccination requirements.
12. As well as New Zealand citizens, both residence class visa holders and Australian citizens ordinarily resident in New Zealand arriving by air are now exempt from entry vaccination requirements. Additionally, travellers aged 16 years and under, travellers with a medical exemption certificate, transit passengers, and travellers otherwise exempt from vaccination² are also able to travel to New Zealand without meeting entry vaccination requirements.
13. The Director-General of Health has indicated a preference that travellers are 'up to date', with their vaccinations based on the definition of 'up to date' in their country of origin, which could include a third (booster) dose if they are available and recommended by public health authorities in that country.
14. Ministers directed DPMC, with MOH and BEB, to provide further advice on options for updating the vaccination requirement for arrivals at the air and maritime borders [DPMC 2021/22-2106 refers].

Strategic context

15. As the relative risk posed by international arrivals has decreased, we have shifted to an increasingly open border with limited measures in place, under our Minimisation and Protection approach.
16. Our domestic strategy has enabled us to move towards being 'open by default', with few COVID-19 specific barriers to travel to capture the social and economic benefits of international travel and trade in an increasingly open world.
17. In early May, Reconnecting New Zealanders Ministers considered a number of key principles that underpin New Zealand's strategic approach at the border. Key aspects included a proportionate and justifiable approach at the border that supports simplicity, stability, and predictability for travellers, while aligning with international norms in order to capture economic and social benefits of an open international border. The principles also noted the need for tools and measures to remain available to respond to significant increases in risk if required.

Purpose of vaccination requirements at the border

18. The purpose of vaccination requirements for entry to New Zealand has changed since measures were first introduced on 1 November 2021. The current objective is to reduce the severity of serious illness from COVID-19, and therefore to minimise the potential burden on the health system, including the overall impact on the ability of Māori to access healthcare.
19. As traveller volumes increase, it will be important that we do not see a high number of travellers entering New Zealand, becoming severely unwell with COVID-19, and placing

² Refugees arriving in New Zealand for the first time, Afghanistan evacuees, some travellers from Ukraine, and travellers from Antarctica are exempt from vaccination requirements.

pressure on our healthcare services and potentially displacing access to health care for New Zealanders. This is particularly important over winter, where the long tail of COVID-19 cases may coincide with another wave of infections³, increased incidence of other winter respiratory illnesses, and the impact of lower childhood immunisation rates, to put pressure on the health system.

Current vaccination requirements at the air and maritime borders

Current COVID-19 vaccination requirements are broad

20. Currently there are 38 vaccines approved by at least one government or approval authority that are acceptable for entry into New Zealand.
21. Travellers must declare their COVID-19 vaccination status in their New Zealand Traveller Declaration (NZTD) and provide evidence of having completed a primary course of an approved vaccine⁴. Travellers are not currently required to have a booster and information on the booster status of arrivals is not captured.

However the majority of arrivals are not required to meet vaccination requirements

22. At present, international arrivals at the air and maritime border that are subject to vaccination requirements are in the minority. However, this number will increase as the number of visa waiver travellers and other visitors grows.
23. Over the past two weeks to 11 June 2022 over two-thirds (67 per cent) of international arrivals were either New Zealand citizens or resident visa holders, and therefore not subject to vaccination requirements. Australian citizens ordinarily resident in New Zealand and other exempt travellers⁵ represent an additional proportion of international arrivals not subject to vaccination requirements.
24. At the maritime border, the vaccination requirement does not apply to crew of commercial vessels (such as cargo and fishing). However, any changes to minimum vaccination requirements would have implications for maritime cruise and recreation vessel passengers given Ministers' recent decisions to extend vaccination requirements to people arriving on these vessels when the maritime border reopens on 31 July 2022, as the same rules would apply.

³ The timing of a potential second wave peak is difficult to predict. It will depend on the total number of infections during the current wave and the speed at which protection due to infection wanes, and changes behaviour (from public health measures or voluntary changes in response to the perceived risk).

⁴ A full course of some of approved vaccines ranges from 1 dose to 3 doses. Travellers can have a combination of different vaccines if that combination is an approved course in the jurisdiction where they were vaccinated.

⁵ For example, under 16s, refugees arriving for the first time, citizens of Afghanistan, certain arrivals from Ukraine and those holding a certificate from a medical practitioner certifying they should not be vaccinated for medical reasons. The Director-General of Health can also grant an individual exemption to the vaccination requirement (upon application).

Options for strengthening vaccination requirements

25. We have considered a number of options for implementing a strengthened COVID-19 vaccination requirement at the border. The options include:
- a) Option 1 – Require travellers to be ‘up to date’ with their vaccinations, by using either:
 - Option 1a – the recommended schedule in New Zealand; or
 - Option 1b – the recommended schedule in their country of origin; or
 - b) Option 2 – Require travellers to have received their last primary dose or booster dose within a prescribed number of days prior to departure to New Zealand (‘maximum interval since last dose’ approach); or
 - c) Option 3 – Maintain the current vaccination requirements (status quo); or
 - d) Option 4 – Maintain the current vaccination requirements and strengthen communications to encourage all incoming arrivals to be ‘up to date’ with all their vaccinations.
26. Consideration needs to be given to the benefits of introducing an ‘up to date’ or a ‘maximum interval since last dose’ vaccination requirement at protecting the health system, when weighed against the equity, social and economic costs, and operational considerations.
27. [Legally Privileged] ^{s9(2)(h)}

New Zealand's recommended domestic schedule of being 'up to date' with COVID-19 vaccinations is evolving

28. The data available on the duration for which vaccines reduce severe outcomes from COVID-19 are derived from a relatively small number of studies and will continue to evolve over time. The Ministry of Health recommends staying up to date with COVID-19 vaccinations; that is for a person to have “received all recommended COVID-19 vaccinations, including any booster dose(s) if and when eligible and due, according to their age and other factors.”
29. Being up to date within the New Zealand domestic context is complex given the variability in when people are recommended to receive doses based on their individual circumstances, such as age, those vaccinated overseas, people with a recent COVID-19 infection or being immunocompromised. These complexities make it difficult to define an absolute domestic standard for what is considered ‘up to date’ with COVID-19 vaccinations.
30. The Ministry of Health's Chief Science Advisor, with input from the COVID-19 Vaccine Technical Advisory Group (CV-TAG) considered these issues in response to a request from the Ministry of Health and advised that currently, a person over the age of 18 years should be

considered 'up to date' for six months after the completion of their primary course. Thereafter, if they have not had a booster they could be considered 'overdue'.

31. The Ministry of Health's Chief Science Advisor, with input from CV-TAG also considered booster schedules where a person has been vaccinated overseas with a vaccine not approved for use in New Zealand. Given the difficulty of assessing the profile of every vaccine and uneven access to vaccines internationally, it was agreed a pragmatic approach was needed. As such, CV-TAG advised that following a completed primary course of any vaccine, plus an additional dose (booster) of any COVID-19 vaccine a person could be considered 'up to date'.

There is no internationally agreed definition of being 'up to date' with COVID-19 vaccinations

32. What constitutes being 'up to date' is also becoming more complex as jurisdictions increasingly have different vaccine advice/requirements for their populations based on individual circumstances. Booster doses are now available and recommended in a number of jurisdictions, including many of New Zealand's key partners, however there is no consistent interval on when boosters are provided, with ranges between two and nine months.
33. In February 2022 the Australian Technical Advisory Group in Immunisation (ATAGI) issued recommendations on 'up to date' COVID-19 vaccination status. They advised that a person is 'due' for their booster from 3 months after completion of their primary schedule and considered 'overdue' if a booster has not been received within 6 months of completing their primary schedule.
34. Internationally, jurisdictions are increasingly trending towards easing, rather than tightening vaccination (and pre-departure testing) requirements for travellers. According to the United Nations World Tourism Organisation, at least 45 jurisdictions (primary in the northern hemisphere where it is summer), including Denmark, Norway, Ireland, Iceland, and the United Kingdom, have lifted all COVID-19 related travel requirements.
35. While some countries, including Germany, Israel, and the Republic of Korea have introduced 'maximum intervals since last dose' vaccination requirements for international arrivals, most have alternative pathways for entry available for people that do not meet vaccination requirements (i.e., pre-departure testing and/or requiring proof of recently recovering from COVID-19).⁶ Given the recent Cabinet decision to remove pre-departure testing, officials have not considered this approach as an option.
36. Key comparator jurisdictions that retain mandatory vaccine requirements for international arrivals (such as Australia and Canada), require only a completed primary course of an approved COVID-19 vaccine for entry.
37. Officials are not aware of any jurisdictions requiring international arrivals to be 'up to date' with the COVID-19 vaccine schedule of their country of origin as a condition of entry.
38. On 1 February 2022, the European Union (EU) established new COVID-19 rules for the validity of their EU Digital COVID-19 Certificates for the purposes of international travel in the EU. Certificates are valid no more than nine months since the last dose of their primary vaccination series unless they have received a booster dose. As of yet, no standard

⁶ For example a valid EU digital COVID certificate includes either: 1) a vaccination certificate where at least 14 and no more than 270 days have passed since the last dose of the primary vaccination series or if the person has received a booster dose; or 2) a negative PCR test result obtained no more than 72 hours before travelling or a negative rapid antigen test obtained no more than 24 hours before travelling; or 3) a certificate of recovery indicating that no more than 180 days have passed since the date of the first positive PCR test result.

acceptance period will apply to certificates issued following the administration of booster doses, given that sufficient data regarding the period of protection is not yet available.⁷

An alternative option could be to set a maximum interval since the last dose

39. We have explored the option to introduce a new requirement for a maximum interval between a final primary dose or booster dose and arrival in New Zealand. There is likely to be a trade-off between setting an interval that provides best assurance of vaccine protection and ensuring that the requirements can reasonably be met by arrivals.
40. Subject to evidence on waning vaccine effectiveness, a maximum interval of, for example, four months could be considered most effective in ensuring individuals are protected against COVID-19, but is likely to have inadvertent consequences, such as cutting off access for non-citizen or resident travellers who have left New Zealand in the expectation of returning if they are unable to access an additional dose while overseas. Travellers who were recently infected with COVID-19 and unable to be boosted for a certain period of time would also likely be impacted.

It is unlikely that requiring travellers to be 'up to date' with their vaccinations or boosted will substantially impact health system capacity

41. While boosters are effective in reducing serious illness and hospitalisation from COVID-19, requiring the proportion of travellers (who are subject to the requirement) to have a booster before coming to New Zealand is unlikely to have a substantial impact on reducing the burden on health system capacity, particularly as some travellers may already have additional immunity due to having had one or more COVID-19 infections in addition to their primary course of vaccination.
42. At present, COVID-19 cases at the border represent a very small number, less than 1 per cent, of total daily cases. This means that hospitalisations from border arrivals are likely to be limited in the current epidemiological context. The number of people leaving New Zealand is currently greater than the number of people arriving, and therefore we expect there to be little impact on the total number of COVID-19 cases. Given the prevalence of COVID-19 in New Zealand, it is equally as likely that New Zealand will export a COVID-19 case as we are to import it.
43. Nevertheless, the Ministry of Health has advised that even a marginal increase in the number of travellers experiencing severe outcomes from COVID-19 and requiring healthcare would place pressure on the health system this winter.
44. Acknowledging that vaccine effectiveness wanes over time and that the number of travellers will increase as additional visa categories open up, it is likely that the health system impact from international arrivals will increase over time but remain modest.

Accessibility to boosters is increasing but is uneven internationally

45. Any requirement for travellers to be 'up to date' with their vaccinations would require travellers to have either had a booster before travelling to New Zealand, or not yet be due for a booster. At present there is no consistent international standard for proof of booster doses which would

⁷ Under these EU rules for intra-EU travel, Member States must accept any vaccination certificate that has been issued less than nine months since the administration of the last dose of the primary vaccination. Member States are not able to provide for a shorter nor for a longer acceptance period.

make it challenging for travellers to meet a new evidentiary requirement. Any new requirement would also need to take into account people not eligible for a booster due to a recent COVID-19 infection.

46. Global access to COVID-19 vaccination, including access to booster doses, is increasing, but is not widespread internationally, with low and lower-middle income jurisdictions disproportionately affected by lower vaccination rates, and some jurisdictions offering boosters to only the most vulnerable in their populations⁸.
47. According to World Health Organization⁹ there are fifty-seven jurisdictions where less than 30 per cent of the population have been vaccinated with a primary course of COVID-19 vaccine and at least 109 jurisdictions where less than 30 per cent of the population have received a booster dose (there are 35 jurisdictions for which WHO have no data available on booster doses administered, it is likely that some of these jurisdictions will yet to have rolled out booster doses).
48. Booster doses are recommended in a number of our key visitor visa markets. However, booster coverage is variable with higher booster rates in Australia and the United Kingdom, and lower rates in India and some Pacific countries.

Bilateral implications of additional booster requirements for some jurisdictions

49. Were New Zealand to adopt border vaccination requirements that are more rigid than those applied in some countries (i.e., Option 1a, over Option 1b and to a slightly lesser extent Option 2), MFAT has advised that bilateral relationships would need to be managed.
50. There would likely be questions raised if New Zealand's requirements were not in step with the rest of the world. Pre-travel requirements such as additional vaccinations for entry into New Zealand, including boosters, would need to be easily available and accessible in jurisdictions around the world.
51. There would also be implications for a large number of travellers from the Pacific, given the wide variation in vaccination status across the region¹⁰. New Zealand has brought forward reopening to visitors from the Pacific, given the strong social, economic, and strategic reasons for doing so. Stricter vaccination requirements could limit this access, running against our goal of restoring social and economic links with the Pacific, in line with the Pacific Resilience Approach.
52. Additional vaccination/booster requirements could impact the operation of some diplomatic missions in New Zealand and our incoming Guests of Government programme.

Implications of additional vaccination requirements

53. There are likely to be negative economic implications of strengthened vaccination requirements, due to a dampening effect on international travel¹¹. Introducing a booster

⁸ In low-income countries booster coverage is negligible (less than 1 per cent) and in lower-middle income countries less than 7 per cent of the total population have received a booster dose

⁹ Data accessed 13 May 2022.

¹⁰ In the Pacific, while supply of vaccines is no longer a limiting factor, some jurisdictions are still rolling out primary courses of vaccination and there is wide variation in roll out of third dose/boosters

¹¹ The Treasury has forecasted the value of the travel services exports to the New Zealand economy to be \$51.7 billion in nominal terms over the period from the first quarter of 2022 through to the second quarter of 2026.

requirement is likely to reduce the size of the potential market of travellers to New Zealand, and it is likely that additional measures (on top of the current measures) would discourage travel for many people. These impacts have the potential to be more severe if New Zealand's vaccination requirements are more complex than competitor markets, making New Zealand a less attractive travel destination. s9(2)(g)(i)

s9(2)(g)(i)

54. The Board of Airline Representatives of New Zealand (BARNZ) has advised that its members are seeing routes servicing destinations with reduced or no health requirements recovering faster than those retaining restrictions. As many countries are scaling down requirements, including vaccination and pre-departure testing, this could make New Zealand a less desirable travel destination.
55. Introducing a booster requirement also risks damaging New Zealand's reputation as a destination. Travellers may find they are no longer eligible to travel here after purchasing tickets and may not be able to meet the requirement (e.g. if they need to meet the Ministry of Health recommendations on 'up to date', but a booster is unavailable in their country).
56. Each of the options that include additional vaccination requirements would have significant operational implications which would make these options difficult, if not impossible, to implement. They also raise equity issues around the accessibility of boosters and potential fourth dose vaccinations in many countries, which would require an exemption process.
57. In general, vaccination certificates include information on how many doses a person has had or only if they have been vaccinated. They do not generally state whether an individual has met a country standard.
58. A new requirement may also cause unintentional non-compliance and is liable to legal challenge. A breach of the vaccine requirement under the Air Border Order is a medium-risk offence with a \$1000 penalty and would not distinguish between a person that is not boosted versus a person that is not at all vaccinated. This would be disproportionate considering the measure is unlikely to have a substantial impact on reducing the pressure on the health system.
59. Any new requirements are also likely to add further complexity to the traveller journey, which will have flow on impacts for airlines and other travel operators. The Ministry of Transport advises that airlines have been clear that any vaccine requirement involving manual checking would have a high impact on their operations. They are struggling to get sufficient staff to manage the increase in travel demand, and don't have resource available to divert to new tasks. Moreover, Air New Zealand is starting or recommencing 15 routes in July, so adding new complexity to the vaccine requirements in the coming weeks would likely have a significant impact on its operations.
60. Constrained by a loss of airline capacity, the recovery of international visitors is sluggish, despite New Zealand being open to 88% of the pre-COVID market - with most travellers visiting friends and relatives, rather than visiting for tourism. Airlines and airports have told officials stable border settings and removing barriers to travel are critical to encouraging airlines to increase capacity/connectivity to New Zealand, and to attract staff. Adding new complexity at a time when countries are loosening or removing their vaccine restrictions could impact airlines' decisions to re-enter the New Zealand market.

Options analysis

Option 1a: Requiring travellers to meet the Ministry of Health recommendations on staying 'up to date' with vaccinations

61. Option 1a would be the most straightforward for international travellers, airlines, and operational agencies to understand, as it provides the same specific requirement for every traveller to meet, however it would have significant implementation and equity issues.

Option 1b: Requiring travellers to meet the definition of being 'up to date' with vaccinations in their country of origin

62. Option 1b would have significant implementation and equity issues and be the most operationally difficult option for implementing an 'up to date' vaccination requirement. Customs have advised that it would be almost impossible to operationalise a country-based requirement to be 'up to date' with vaccinations given it would require keeping up to date with the vaccination standards of around 200 jurisdictions. Given these complexities, checking of travellers' vaccination status will not be able to be undertaken; this option would need to be implemented under a high-trust approach where travellers self-declare that they are 'up to date' with their vaccinations based on what they determine as their country of origin.

Option 2: Requiring travellers to have a maximum interval since last primary dose/booster dose

63. This option would be operationally feasible to implement at the border although it would not be a zero-impact option for airlines and border agencies.¹² The expected increase in traveller volumes would mean an additional layer of checks for an expanding number of travellers both at check-in and at the border¹³.

64. A trade-off would also need to be made between setting a maximum interval since last primary dose/booster dose that provides the best assurance of vaccine efficacy while also ensuring the new requirement could be reasonably met by international arrivals. The Ministry of Health considers that the most pragmatic approach would be to align requirement in line with the EU approach of a maximum period of nine months after a completed primary course, unless boosted. Consideration would also have to be made for individuals who need to delay their booster due to having had a recent infection.

Both options 1 and 2 would require a lead in time to implement and may not last long

65. Operational agencies have advised that at least three to four weeks lead in time would be required before options 1 or 2 could be implemented, in order to update the exemptions regime, make changes to the NZTD, prepare communications and train border staff.

¹² The NZTD can apply a single or multiple rule requirement against which each vaccination certificate could be automatically assessed in the system. Customs and airlines would need to manage operational impacts on border processes from travellers who may have had difficulty uploading their documents to the system or who complete a last-minute paper form at airline check-in. Currently less than 10 per cent of vaccination certificates are being manually checked at check-in and the border to assess whether they meet the rules (over 90 per cent of declarations are successfully submitted to the NZTD digital platform).

¹³ Officials suggest consideration be given for border agencies to take a risk-based assurance approach where Customs officers undertake random sampling for checking of vaccination certificates (this includes those certificates presented at check-in and the border as well as those uploaded directly to the NZTD digital platform that cannot be automatically verified by the system. Currently around 40 per cent of vaccination certificates successfully uploaded to the NZTD require manual checking by a back-office verification function. This proportion may rise as number of arrivals increases. A more flexible approach will assist with facilitating travellers while ensuring a level of risk assurance.

66. As the Director-General of Health has signalled that vaccination requirements for international arrivals may only be required until September, or when the post-winter strategy comes into effect, there is also a trade-off between the operational complexity and investment in implementation, and the effectiveness of strengthened requirements in the short-term.
67. There will also be travellers who have booked a trip to New Zealand based on the current vaccination requirements and may no longer be eligible if there is a booster requirement. These travellers need time to either get a booster or change their booking. It will also be confusing if this requirement is only in place for several months (i.e. over winter).

Option 3 – Maintain the current vaccination requirements (status quo)

68. The status quo is being delivered to support existing settings. Airlines, border and contact centre staff are familiar with the requirements and increasingly so are travellers. This will transfer into the maritime border as it opens up. However, the drawback is that a primary vaccination course vaccine is unlikely to provide sufficient protection against severe outcomes.

Option 4 – Maintain the current vaccination requirements and strengthen communications to encourage all incoming arrivals to be 'up to date' with their vaccinations.

69. Option 4, 'maintain the current vaccination requirements at the border and strengthen communications to encourage all incoming arrivals to be 'up to date' with their vaccinations', is the most practical and feasible option, with operational systems and processes currently in place to ensure compliance with requirements. This approach is more consistent with the direction of the Reconnecting New Zealanders strategy, with the aim of moving towards being 'open by default', along with the global trajectory of easing border restrictions. This option is more straightforward from a communications perspective and avoids 'mixed messaging' of easing some restrictions while tightening others.
70. While this option does not involve adding further regulatory changes to vaccination requirements, we consider that strengthened public health messaging could be used to strongly encourage all travellers to New Zealand to be 'up to date' with their vaccinations. If eligible, due, and available to them, travellers should be encouraged to be boosted before departing for New Zealand. The Ministry of Health consider that this messaging could also incorporate staying up to date with other vaccinations, such as for seasonal influenza and measles.
71. This approach, supported by DPMC, the Ministry of Foreign Affairs and Trade and would align with the key principles of our Reconnecting New Zealanders approach to border settings and strike a pragmatic balance between the key consideration factors outlined above.
72. The Ministry of Health recognises there are considerable operational challenges, but that if the intent of the requirement is to protect the health system from the pressure of travellers who become unwell with COVID-19 while in New Zealand then the vaccination requirement would need to include a booster (if they are eligible and due).

Next steps

73. Subject to your decisions officials will either:
- Develop and roll-out strengthened public communications aimed at encouraging incoming arrivals to be 'up to date' with their vaccinations; or

- b) Provide further advice on the most appropriate maximum interval between last primary dose or booster dose, and departure to New Zealand (option 2: 'maximum interval since last dose' approach by 1 July.
- 74. DPMC will be providing further advice on the 'post-winter' COVID-19 strategy which will be considered by the Social Wellbeing Committee on 29 June.
- 75. DPMC will engage the Ministry of Health on whether a further review of vaccination requirements currently due to Ministers in July 2022 [DPMC-2021/22-2106] is required in light of this Briefing.
- 76. Should there be a significant change in the risk profile of international arrivals to New Zealand, for example due to a variant of high clinical severity or a material advancement in COVID-19 vaccine efficacy, further advice will be provided.

Proactively Released