



Airline Views

May 2021

1 What is a 'safe' international border reopening?



Industry remains ready to collaborate with governments over a risk-based framework to allow the easing, or removal of international travel restrictions.

The conservative 2021 Federal Budget assumptions about closed international borders reflect the absence of a known plan for a gradual reopening; and confusion remains as to what such a reopening could look like.

There are some overseas examples that provide insights into how a gradual reopening can occur, which can be scaled up in line with vaccination programs.

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2 International aviation aircraft passenger load factors



Both inbound and outbound load factors are now down to about 15% of available seats for passenger flights subject to mandatory hotel quarantine.

With the sustained decline in departing passenger numbers, the commercial viability of the small network of international flights is becoming increasingly dependent on air freight.

The New Zealand Safe Travel Zone is a welcome outcome, allowing airlines to operate more commercially viable international flights.

3 \$2 billion annual economic anchor



BARA estimates that the international border closures are costing the Australian taxpayer some \$2 billion a year in grants and lost revenues.

Taxpayer funding for air navigation and weather services will need to continue until there is a recovery in international aviation, which previously funded most of these services.

The Australian Government is also not collecting some \$1.3 billion per year in the Passenger Movement Charge (PMC). Any attempt to recoup these lost revenues through a higher PMC will only stifle industry recovery.

4 Australian aviation safety programme



BARA has provided its input to the consultation documents covering aviation safety for international flights to and from Australia.

The expected gradual recovery in international flights will be dominated by new generation aircraft. It is important to make the best use of these aircraft in supporting safe and efficient aircraft operations.

BARA also calls for greater reference to airfield safety outside runway incursions, and how airfield safety issues will be managed with a return to high volumes of traffic, especially around the international terminals.

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What is a ‘safe’ international border re-opening?

There is much ongoing commentary about Australia’s international borders and the conditions under which a gradual re-opening may occur. Terms used include ‘low risk’ countries, vaccination rates, testing requirements and when advice from health officials deem it ‘safe’. But little is known about what will be required for Australia or how ‘safe’, however defined, can be made to work in practice. A number of overseas examples are emerging, which provide some useful insights.

Many people were expecting guidance about plans to reopen Australia’s international borders in the 2021 Federal Budget. That a Federal Budget is a key source of information about such matters, rather than a publicly available framework incorporating industry consultation, highlights the important work yet to occur.

Some searching revealed these pointers: ‘As international borders reopen and international tourism gradually returns over 2022...’ and ‘Inbound and outbound international travel is expected to remain low through to mid-2022...’¹ They suggest Australia’s international borders are to remain closed for the foreseeable future.

Such assumptions are to be expected given the lack of progress towards a plan for how international travel restrictions could be eased or lowered with overseas countries in a staged, risk-based manner.

Clarity vs certainty

International airlines have been clear that the decision rests solely with governments as to when to ease international travel restrictions. BARA does note a number of health professionals have now stated it’s time for Australia to begin the planning and work to reconnect Australia.² But this raises the issue of whether Australia is willing to accept some level of risk from COVID-19, especially if there is widespread vaccination across the community.

In specifying the conditions under which travel restrictions can be eased or removed with an overseas country, the implementation date can only be an estimate as it will be subject to prevailing health outcomes. As such, it is most realistic for governments to clearly specify criteria for easing or removing travel restrictions with an overseas country, with implementation dates ultimately based on how well COVID-19 is being managed. As occurs today under the quarantine free travel between Australia and New Zealand, passenger flights can be paused or suspended in light of any outbreaks of COVID-19.

Airlines play a key role in putting government requirements into operation. As occurs today under the hotel quarantine system, airlines are expected to: confirm the negative test result of passengers; conduct operations in accordance with the plethora of state-based regulations; and adhere to the per flight passenger arrival caps.

Workable plans are far more likely to emerge when governments collaborate with airlines. Many government departments and agencies have widely acknowledged the support and professionalism of airlines in managing COVID-19, and they remain committed to working with governments in developing the plan to safely reconnect Australia.

¹ Budget Paper No1, p 34 & 36

² See for example, comments by the Victorian Chief Health Officer on 17 May 2021.



Arrangements in the United Kingdom

New rules for international leisure travel from England began on 17 May.³ The framework combines country risk-ratings with different quarantine arrangements for returning passengers based on a traffic light system for overseas countries (green, amber and red).

Twelve countries and territories have been added to the 'green' list, including Australia. Passengers arriving from these countries do not need to quarantine on return to England. They still need to take a pre-departure test up to 72 hours before their return travel, and a single PCR test on or before day 2 of arrival into England.

Ten-day managed hotel quarantine requirements remain in place for those permitted to return from 'red' countries. Quarantine at home plus testing is required for those returning from 'amber' destinations.

The country rating lists will be reviewed every three weeks, informed by public health advice. The government will also be publishing a green watchlist, to provide an indication when a country is identified as a candidate for changing to a non-quarantine 'green' risk rating.

Singapore's Air Travel Pass

Short-term visitors (including business and official travellers) travelling from Australia, Brunei Darussalam, Mainland China and New Zealand, may seek entry into Singapore by applying for an Air Travel Pass (ATP).⁴ An ATP holder must:

- have been in the declared point of departure for the last 21 consecutive days
- travel to Singapore on a direct flight
- undergo a PCR test at the airport upon arrival, and remain isolated at the declared

accommodation until the test result is confirmed as negative

- disclose, and agree to the medical provider disclosing the PCR test result
- download the TraceTogether app and keep activated while in Singapore
- retain the TraceTogether app and data for 14 consecutive days after leaving Singapore and upload upon request
- buy travel insurance, with a minimum coverage of S\$30,000 for COVID-19-related medical treatment and hospitalisation costs
- adhere to the prevailing public health measures while in Singapore.

Lessons for Australia

Gradual, risk-based and ongoing review are all features of the early overseas frameworks used to ease international travel restrictions. They are initiatives that allow limited international travel where possible, until widespread vaccination offers opportunities for more open international borders. Electronic processes are also needed given the extra information that must be obtained and shared by passengers.

For Australia, debate about risk and criteria and gradual progress is far more useful than the polar positions of 'closed' vs 'open' international borders. It allows for a path to reconnect Australia that adapts with changing circumstances.

The Australian Government is investing \$1.9 billion in its COVID-19 Vaccination Strategy. Australia will get the most value from this investment when it is linked to a scalable plan that permits greater travel freedoms in line with reduced risk from COVID-19, including as vaccination rates progressively increase.

³ See <https://www.gov.uk/government/news/government-confirms-traffic-light-list-ahead-of-cautious-return-to-international-travel>

⁴ See <https://safetravel.ica.gov.sg/atp/requirements-and-process>



Australian aviation safety programme

BARA recently responded to The Australian National Aviation Safety Plan (Draft Safety Plan), focusing on how the plan applies to international flights to and from Australia. The Draft Safety Plan identifies specific risks and challenges for Australia's aviation, including new technologies, present low levels of traffic volumes, infrastructure, and workforce capabilities. BARA's submission notes the increasing capabilities of new generation aircraft and the need for ensuring high standards of safety at the major international airports.

Pre-COVID when traffic volumes were high, member airlines had raised with BARA the issue of airfield safety, especially foreign object debris (FOD) and other airside operating practices.

Given such issues, the *Draft Safety Plan* should refer more to the issues of airfield safety outside of runway incursions, and how airfield safety issues, such as FOD and airside operating practices, will be safely managed with a return to high volumes of traffic.

New generation aircraft

The expected gradual recovery in flights will be dominated by modern, new generation aircraft, as can be seen in the mix of aircraft operating to and from Australia during the pandemic. The *Draft Safety Plan* should also recognise the potential opportunities in making the best use of onboard technologies available on new generation aircraft in supporting increasingly efficient and safe aircraft operations.

The *Draft Safety Plan* could well include a statement that Australian safety design and systems will also draw on world's best practice, where appropriate for Australian conditions, to keep abreast of the latest developments in safety thinking and research. Formal connections should exist with the Single European Sky Air Traffic Management Research (SESAR) and NextGen (US Federal Aviation Administration) initiatives.

Safety indicators and targets

BARA noted the *Draft Safety Plan* doesn't offer any target dates for safety performance indicators, and it's unclear as to whether the targets are annual, to be achieved by the end of 2023, or if they are longer range targets.

Also, as no performance baseline is presented, it's not clear how the industry is already performing and whether it can achieve the 10% reduction to the target value often proposed for individual measures.

Other emerging safety areas

BARA noted the *Draft Safety Plan* did not specifically address the following emerging areas, which need to be considered:

- Many passenger and aircraft servicing operations for international airlines at Australia's major international airports are now largely done by specialist providers or ground handling companies rather than airlines. These changes need to be incorporated into safety management.
- Remotely piloted aircraft systems (RPAS) are developing rapidly and bring safety issues of RPAS airspace containment and RPAS separation management with existing airspace users.
- Low level wind shear and wake turbulence and the candidate technological solutions such as ground based LIDAR (Low level Windshear) and On-board Predictive Wind Shear System (PWS).