



Airline Views

February 2022

1 A simplified and uniform framework



Passengers and airlines have managed throughout varied and changing requirements since the international border first reopened on 1 November.

Tens of thousands of Australians returned home, and an equal number of families reunited, under the initial international border reopening. The extensive and changing requirements, however, will not support a sustained recovery in international aviation.

There is now an opportunity to draw on what was learnt from the initial reopening and incorporate it in developing a simplified and uniform set of requirements for international aircrew and passengers.

[CLICK HERE TO READ MORE](#)

2 Western Australia's international border 'reopening'



International passengers can now home quarantine, similar to the early arrangements in Queensland and South Australia.

Western Australian citizens can now return directly via international flights for home quarantine. Permitting home quarantine at least provides a path home for some of the estimated 20,000 Western Australian citizens overseas.

The similar short-lived arrangements for Queensland and South Australia generally failed to allow more returning citizens. Airlines will do what they can, noting the continuously changing arrangements are chaotic for passengers and airlines.

3 2020–21 industry revenues



2020–21 international passenger and freight revenues were estimated at \$6.5 billion, down from \$38 billion in 2018–19.

Pre-pandemic, airlines operated some 2,000 international flights to Australia each week, with 840,000 passengers and 22,000 tonnes of freight. Estimated revenues were some \$38 billion in 2018–19.

BARA estimates that airline revenues for international flights fell by over 80% to about \$6.5 billion in 2020–21. Passenger volumes are now 10–15% of pre-pandemic, still a long way from a sustained recovery.

4 Four main issues



BARA has identified four main issues covering aircrew and passengers that should be dealt with as a priority.

Airlines need to be able to operate their flights without incurring ongoing persistent delays and multiple cancelled departing flights.

All passengers, including international tourists, need to have one clear and manageable set of requirements on arrival. This will be critical to support tourists travelling between Australian states and territories.

[CLICK HERE TO READ MORE](#)



A simplified and uniform framework

The reopening of Australia's international borders was immensely important in returning home Australians and reconnecting families. The arrangements, however, did prove somewhat vulnerable to changes in the COVID-19 environment. The industry would be best served by a simplified and uniform set of arrangements less likely to be subject to ongoing changes.

When the New South Wales (NSW) and Victorian (VIC) international borders reopened on 1 November 2021, tens of thousands of Australians could return home and an equal number of families were reconnected. The importance of this cannot be understated given the tragic circumstances of many Australians stranded overseas under the tight passenger arrival caps, which continued for some 16 months.

Then on 28 November 2021, NSW and VIC moved to 72 hours self-isolation for arriving passengers and aircrew in response to the Omicron variant, which demonstrated how quickly circumstances can change. The new requirements left little time for passengers and airlines to respond, and it's likely only a limited number of passengers complied with the new rules. The requirements for passengers have changed many times since 1 November.

The South Australian (SA), Northern Territory (NT) and Queensland (QLD) international borders reopened after that and provide a viable but varied and potentially changing path for Australian citizens and permanent residents to travel overseas and return to Australia.

Reopening vs industry recovery

Airlines are currently operating about 20% of their international flights at 10–15% traffic volumes compared to pre-pandemic for states other than Western Australia, (which remains at about 1% traffic volumes). Allowing international tourism from 21 February is another important step in the gradual recovery in Australia's international aviation and tourism industries.

The reopening arrangements for passengers and airlines are complicated. They include ongoing passenger caps per flight for unvaccinated arrivals that still undergo mandatory quarantine, and airlines being responsible for the initial verification of passenger vaccination and exemption status at overseas airports. The requirements for arriving and departing passengers (Australian and overseas countries) remain extensive and can include: pre-departure PCR tests; arrival tests, self-isolation; and passenger location forms.

The recovery in international aviation depends on a number of factors, some of which are outside the control of the industry. Consumer confidence to travel with COVID-19 widely circulating in many countries will be a major influence.

What would best serve the industry and is within control of government is for the Australian, state and territory governments to commit to one simplified and uniform set of arrangements for international aircrew and passengers.

A simplified and uniform framework would provide passengers and industry the certainty necessary to support the gradual growth in traffic volumes. Passengers could plan travel with a clear understanding of travel requirements to anywhere in Australia. Airlines would also be able to develop business cases for increased flights based on known policy parameters for international travel and flight operations.



Four main issues

International airlines have worked hard in supporting the initial reopening of Australia's international borders. BARA has identified four main issues where simplification and uniformity would best support commercially viable international flights and international tourism. While it is unlikely this important work can be completed by 21 February, its progress will be integral to the continued growth in international traffic volumes.

Allowing international airlines to manage their aircrew

Airlines need to be able to operate their flights and manage their aircrew in line with their policies for COVID-19 safe operations. The varied requirements across state and territory governments do not fit well with supporting efficient aircraft operations.

Over the course of the pandemic, international flights have been subject to substantial delays and flight cancellations. Even at the small traffic volumes, many international flights are delayed for over an hour. Sustained cancellations of some 70% of departing flights has occurred when all aircrew are placed in self-isolation if one aircrew member tests positive to COVID-19.

The main requirements that apply to aircrew are:

Pre-departure testing

Requirements across states range from 'must' to 'should' have a negative COVID-19 test with 72 hours of departure to Australia, to no mandated requirement. One state further stipulates that aircrew overseas must have a PCR test in response to a pre-departure positive RAT.

Arrival testing and self-isolation (fully vaccinated)

Aircrew can be required to have a COVID-19 test within 24 or 48 hours of arrival. If the flight turnaround time is less than the stipulated time, then aircrew can leave Australia without being tested.

Self-isolation arrangements for aircrew are either: a requirement to self-isolate until a negative test result; or no requirement to self-isolate (but still a test within 24 hours).

Close contact rules for a positive aircrew member

The close contact rules for aircrew have proven the most difficult to manage. Depending on the health requirements, which have changed many times, the departing flight may or may not operate depending on whether all aircrew must self-isolate.

Given the high vaccination rates of international aircrew (often 100%) and airline policies in operating globally (including infection control and testing regimes), there is a strong case for removing testing and self-isolation arrangements as they are unlikely to lower the risk of COVID-19 for the community.

A uniform close contact definition and procedures for airlines to follow is also necessary. These need to support the ability for airlines to continue operations while demonstrating effective management of the health risks.

Definition of 'fully vaccinated'

There are multiple different definitions of 'fully vaccinated' across the Australian and state and territory governments. The differences mainly lie in the coverage of the exemptions criteria, and the Australian Government may even now have multiple definitions. Clearly one definition of *fully vaccinated* for all passengers is necessary.



The Australian Government has defined fully vaccinated for Australians seeking to depart the country as:

- completed a course of a TGA approved or recognised vaccine; or
- unable to be vaccinated for medical reasons; or
- less than 12 years of age.

The Australian Government's recent announcement for international tourists was that they must be 'double vaccinated'. This suggests a different definition of fully vaccinated for international arrivals, perhaps requiring all people regardless of age to be double vaccinated.

State and territory governments determine quarantine requirements for arrivals, and have different exemption criteria in their definitions of fully vaccinated. In particular, the age of the passenger that can qualify as fully vaccinated without being vaccinated for quarantine on arrival ranges from 12 to 18 years.

Pre-departure and arrival testing and self-isolation

The extensive and varied testing and self-isolation requirements for arriving passengers across jurisdictions need to be reviewed in light of the objectives being sought.

Pre-departure testing of passengers before they board their flights into Australia is set by the Australian Government, which is a commonly cited barrier to international travel. As recommended by the Australian Health Protection Principal Committee, given changing circumstances, the benefit of measures in place for international passengers need to be reviewed.

There are varied testing and self-isolation requirements on arrival for passengers across the state and territories. Usually, a test within 24 hours of arrival is stipulated, which might also

require the passenger to self-isolate until they have a negative result. Another test on day 6 may also be required.

These differing arrangements will create confusion for international tourists about their obligations when they travel to Australia and across states and territories within Australia. It inhibits the ability to have clear communications with all passengers, including tourists, about the requirements for entering Australia.

Passenger arrival caps and current quarantine arrangements

Finally, BARA considers it may be time to review the need for 14 days mandatory quarantine for unvaccinated returning Australians – likely less than 100 passengers per day.

If mandatory quarantine were replaced with alternative measures, such as a period of home self-isolation and required testing, it would free up health and other resources that could be better used supporting the current situation in the community.

It would also reduce the complexity of operations for international airlines. It is administratively difficult and expensive for them to operate two passenger groups, namely a capped number of passengers for mandatory quarantine and uncapped non-quarantine arrivals.

A long list of items for review

The initial reopening of Australia's international border focused on returning Australians and reuniting families. While uniformity in arrangements was desirable, it was not a barrier to those seeking to return to Australia.

Simplified and uniform arrangements will be necessary to best serve Australia's international aviation and tourism industries. International airlines stand ready to provide their continued support to the international border reopening.