



# Briefing

## REVIEW OF VERY HIGH-RISK COUNTRIES: INDIA, PAKISTAN, BRAZIL AND PAPUA NEW GUINEA

To: Reconnecting New Zealanders Ministerial Group

Date	16/08/2021	Priority	High
Deadline	18/08/2021	Briefing Number	DPMC-2021/22-159

### Purpose

1. This briefing provides an overview of the updated public health review of the original Very High-Risk countries (India, Pakistan, Brazil and Papua New Guinea) and recommends that these countries are reclassified as High-Risk.

### Recommendations

1. **Note** that the Minister for COVID-19 Response received an updated risk assessment from the Ministry of Health on 6 August outlining that the situation in the original Very High-Risk (VHR) countries (Brazil, India, Papua New Guinea and Pakistan) could now be considered high-risk
2. **Note** that there are currently substantial public health mitigations in place for travellers from High-Risk (HR) countries (such as Pre-Departure Testing, MIQ, cohorting, and testing in MIQ), and that the public health advice is that travellers from the original VHR countries can now be managed effectively in line with these mitigations
3. **Note** that if the original VHR countries are classified as HR the number of additional travellers arriving in New Zealand from these countries is likely to be moderate and staggered throughout the rest of 2021, due to:
  - 3.1. Limited availability of spaces in MIQ
  - 3.2. Travel restrictions in the VHR countries which make it difficult for some travellers to leave
  - 3.3. Limited flight availability
  - 3.4. Travellers affected by the current VHR classifications having continued to return to New Zealand (via 14 days in a non-VHR country).

4. **Note** that further volume limiting measures such as cancelling or manually adjusting existing MIQ bookings or building new IT functionality into MIAS (that would allow the system to restrict the volume of rooms available to travellers from some countries) are not recommended due to the significant operational and legal implications and as they would not mitigate public health risk in any material way
5. **Agree** that travellers from the following countries are reclassified as High-Risk and will be managed in accordance with other High-Risk countries:
  - 5.1. Agree to re-classify India as High-Risk
  - 5.2. Agree to re-classify Pakistan as High-Risk
  - 5.3. Agree to re-classify Brazil as High-Risk
  - 5.4. Agree to re-classify Papua New Guinea as High-Risk
6. **Note** that the Ministry of Foreign Affairs and Trade (MFAT) requires 24 hours after Ministerial decision and before public announcement to advise affected foreign governments
7. **Note** that following Ministerial decisions officials will publish the COVID-19 risk assessments of all four countries discussed in this paper (India, Pakistan, Brazil and Papua New Guinea)
8. **Note** that amendments to the COVID-19 Public Health Response (Air Border) Order will be made to reflect the above decisions
9. **Agree** to proactively release this Briefing subject to any redactions, as appropriate.


YES / NO

YES / NO

YES / NO

YES / NO

YES / NO

 Ruth Fairhall <b>Head of Strategy and Policy, COVID-19 Group, DPMC</b>
16.8.21 ...../...../.....

Rt Hon Jacinda Ardern <b>Prime Minister</b>
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Hon Grant Robertson <b>Minister of Finance</b>
...../...../.....

Hon Chris Hipkins <b>Minister for COVID-19 Response</b>
...../...../.....

Hon Nanaia Mahuta  
**Minister of Foreign Affairs**

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Hon Kris Faafoi  
**Minister of Immigration**

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Hon Michael Wood  
**Minister of Transport**

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Hon Peeni Henare  
**Associate Minister of Health (Māori Health)**

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Hon Dr Ayesha Verrall  
**Associate Minister of Health**

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Hon Aupito William Sio  
**Associate Minister of Health (Pacific Peoples)**

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Hon Meka Whaitiri  
**Minister of Customs**

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Contact for telephone discussion if required:

Name	Position	Telephone	1st contact
Ruth Fairhall	Head of Strategy and Policy, COVID-19 Group, DPMC	s9(2)(a)	✓
Sam Willis	Sam Willis, Senior Policy Advisor, Strategy and Policy, COVID-19 Group, DPMC	N/A	

Minister's office comments:

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

## REVIEW OF VERY HIGH-RISK COUNTRIES: INDIA, PAKISTAN, BRAZIL AND PAPUA NEW GUINEA

### Background

1. On 5 July 2021 Cabinet agreed to a new approach to country risk assessment, based on a broad range of public health considerations. India, Pakistan, Papua New Guinea and Brazil were originally classified as VHR countries (original VHR countries). Only New Zealand Citizens (and dependants) can travel directly to New Zealand from these countries. All other travellers must spend 14 days in a non-VHR country before coming to New Zealand. Exemptions are provided for humanitarian needs and some foreign diplomats.
2. Cabinet agreed that following a detailed public health assessment, an inter-agency process would determine appropriate risk responsive mitigation measures for travellers from countries and jurisdictions that pose a very high risk [SWC-21-MIN-0101 refers]. Advice, considering a range of factors and mitigations (alongside public health advice), would then be provided to the Reconnecting New Zealanders Ministerial Group to make a final decision.
3. Cabinet also agreed that officials would report back to the Reconnecting New Zealanders Ministerial Group every four weeks to ensure that any risk mitigation measures imposed are still justified or should be reduced.
4. On 8 July 2021 the Minister for COVID-19 Response received advice from the Ministry of Health which outlined that the in-country situation had improved in each of the original VHR countries. The Ministry advised that the public health risk assessment highlighted

that these countries would now be considered high risk, but that they continue to be treated as VHR while the Government considers how to manage the risk that changes in travel flows (as a result of changed risk ratings) may present to New Zealand.

5. On 6 August the Ministry provided an updated public health risk assessment advising that the situation in each of the countries has continued to improve. These assessments highlight that the four VHR countries are now considered to be high risk and that anticipated travel flows can be managed effectively within high risk measures. The public health risk assessment for each of the four VHR countries is attached in [Appendix 1](#).

### **Public health advice from the Ministry of Health is that the original VHR countries could now be considered high-risk**

6. The public health risk assessment outlined the following considerations for the original VHR countries:
  - a) India – Reported case numbers have decreased significantly from a weekly rolling mean of 283 daily cases per million on 8 May to fewer than 30 daily cases per million since 11 July. Testing rates have improved and the vaccination roll out has continued to progress, with 27% of the population now having received one vaccination dose.
  - b) Pakistan – Reported case numbers have decreased overall from 25 daily cases per million on 25 April to 5 daily cases per million on 20 June. Daily case numbers were increasing but have started to fall again and remain low. Currently 21 daily cases per million are reported. Reported deaths have also continued to decrease. Since the previous assessment, vaccination rates have continued to rise with the percentage of the population that are fully vaccinated increasing from 1.6% cent to 2.94%.
  - a) Brazil – Reported case numbers have dropped significantly from 364 per million on 24 June to 150 per million in on 9 August (seven day rolling average). Vaccination rates have continued to increase with 50% of the population now having received one vaccination dose.
  - b) Papua New Guinea – Reported case numbers have decreased overall from 33 daily cases per million on 28 May to 2 daily cases per million on 9 August. Vaccination rates are increasing with 86,828 vaccine doses now administered.
7. The public health risk assessment also considered what risk mitigation measures are required for travellers from these countries and recommended that these travellers could be managed effectively in line with other HR countries, without any further public health measures required. The public health risk assessment is provided in full in [Appendix 1](#).
8. A range of substantial public health measures are currently in place for HR countries including:
  - a) Pre-Departure testing
  - b) The requirement to enter MIQ for 14 days
  - c) Cohorting of arrivals in MIQ facilities
  - d) Systematic testing in MIQ including testing on day 0/1, testing on (or around) day 3, and testing on (or around) day 12
  - e) Ending the transporting of guests to exercise



- f) A test on day 5/6 for close contacts or confirmed/probable cases.
9. Work is currently underway by the Ministry of Health and MIQ to implement additional returnee testing for travellers from all HR countries. We understand that additional testing will be piloted from mid-September with full implementation anticipated in October. Further advice was provided to the Minister for COVID-19 Response on 16 August.
10. We have considered whether travellers from the original VHR countries could be included as part of this pilot. However, the Ministry of Health consider that doing so would require implementing the additional testing requirements across all MIQFs. The pilot cohorts will be selected flights (which could include travellers who have come from different countries) going into specific MIQFs, as opposed to a cohort based on country of origin which would be challenging to operationalise.

### **Traveller flows from the original Very High-Risk countries are likely to remain low for the remainder of 2021**

11. Travel volumes from the original VHR countries are low and are likely to remain relatively low even if travel restrictions from these countries are lifted.
12. This is due in part to the current travel restrictions under the VHR category (to only New Zealand Citizens and dependent family members), however traveller volumes are also limited by other external factors such as flight availability and other countries' travel restrictions.
13. Officials are aware that New Zealand residents and other visa holders have continued to leave India and enter New Zealand by spending 14 days in a non-VHR country (tour companies have been operating packages via the Maldives, Russia, and Serbia). At present MFAT is managing 158 consular cases involving New Zealanders in VHR countries.

*Future travel flows are likely to remain modest over the coming months*

14. Travellers from the original VHR countries hold bookings for a relatively modest number of rooms over the coming months.
15. MIQ data outlined in the table below, highlights that travellers from the original VHR countries hold MIQ bookings for 771 rooms (1,310 travellers) between 13 August and 31 November. This averages at just over 7 new rooms per day or about 6.5% of rooms currently booked. The below table provides a country specific breakdown:

**Total MIAS allocation 13 August – 31 November 2021**

VHR Country	Rooms booked	Number of travellers	Proportion able to enter under VHR settings
India	654	1,148	35%
Pakistan	40	75	81%
Brazil	27	36	56%
Papua New Guinea	40	75	88%

16. If New Zealand's VHR restrictions are lifted we expect the number of travellers entering MIQ from these countries to be less than the current MIAS allocation numbers, primarily due to other countries' travel restrictions and limited flight availability.
17. If VHR restrictions are eased there will be an increase in travellers eligible to enter New Zealand directly (including New Zealand Residents) who will seek to make new MIQ bookings. However, as travellers from VHR countries have continued to book spaces in MIQ despite current travel restrictions, it is unclear whether there will be a significant increase in demand above current bookings. In particular, 65% of travellers from India currently booked do not include a New Zealand citizen in their party.
18. The ability of travellers from the original VHR countries to secure an MIQ place over the remainder of 2021 will be very limited. No rooms are available online across the entire booking period (August to November). While further rooms will be released for September, October and November, recent releases have been quickly subscribed (in particular with New Zealanders travelling from the United Kingdom and United States<sup>1</sup>) and further demand from these countries is anticipated for summer 2021/22.
19. In addition, the recent Trans-Tasman suspension has also seen a significant number of rooms reallocated across July and August (including rooms released from the 500 room QFT contingency) to support New Zealanders returning from Australia. Further decisions will determine the full impact of the QFT suspension of MIQ availability to travellers from other countries. It is likely that MIQ will face a noticeable increase in demand from travellers from Australia between the resumption of red flights with Australia and the end of the QFT suspension.
20. This increase in demand has reduced the proportion of bookings from VHR countries over time. Travellers from India make up only 2% of rooms currently booked (30 rooms total) in the most recently released month (November), down from 6% of room bookings for August. However, if travel restrictions are eased, we anticipate that the proportion of travellers from these countries may increase over time.

### **Traveller volumes from Very High-Risk countries are significantly limited by flight availability and the countries' internal travel restrictions**

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21. While New Zealand's travel restrictions for VHR countries contribute to the reduction of arrivals from these countries, other external factors limiting arrivals include:
  - a) Limited flight availability from VHR countries
  - b) Travel restrictions in the VHR countries which make it difficult for some travellers to leave
  - c) Higher travel costs for non-New Zealand citizens affected by the VHR policy returning via 14 days in a non-VHR country.
22. There are limited travel options from India with restrictions on the major travel routes via Dubai and Doha and some major airlines not currently uplifting passengers from India. While the situation is fluid, these restrictions may last for some time.

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<sup>1</sup> Who hold 40% of rooms booked online over October and November.



23. Emirates relaunched passenger services from India on 5 August (following their suspension in late April), allowing eligible travellers from India to travel to/transit the United Arab Emirates. While UAE travel bubble rules limit use of this route, the airline has advised informally that travellers who met pre-departure travel requirements, including confirmed entry into New Zealand, would not be prevented from departing India.
24. Demand from Brazil, Papua New Guinea and Pakistan is expected to be very low. Travel numbers were already low before the creation of the VHR category; some small numbers have continued to arrive, however flight routes continue to be limited.

*There are limited additional options for further limiting the volume of travellers from (previously) VHR countries*

25. There are limited additional options for limiting traveller flows from the original VHR countries. This would involve either:
  - a) cancelling or manually adjusting existing MIQ bookings;
  - b) building new IT functionality into MIAS that would allow the system to restrict the volume of rooms available to travellers from VHR countries; or
  - c) easing travel restrictions from some visa types (such as New Zealand Residents) and continuing to restrict travel from other visa types (such as those on a Critical Purposes Visa).
26. Given that the overall increase in traveller volumes from these countries is likely to already be moderate and staggered, these options would not reduce public health risk in any substantial way. These options would also have significant operational, legal and equity implications, outlined in further detail in [Appendix 2](#), and are not recommended.

## **We recommend re-classifying the original Very High-Risk countries as High-Risk**

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27. As the anticipated increase in travel volumes associated with reclassifying the original VHR countries is likely to be moderate, the public health advice from the Ministry of Health and the operational advice from MIQ is that travellers from these countries can be managed effectively in line with measures in place for other HR countries.
28. Given the reduced risk from these countries we do not recommend that any further bespoke mitigation measures are implemented, beyond the significant measures that are already in place for HR countries currently.
29. We therefore recommend that India, Pakistan, Brazil and Papua New Guinea are reclassified as High-Risk countries and that the standard High-Risk mitigation measures are applied.

## **Legislative amendments to action Very High-Risk recommendations**

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30. The original VHR country provisions are contained in schedule 3 of the COVID-19 Public Health Response (Air Border) Order (ABO) and as such only apply to travellers arriving by air into New Zealand. In order to amend the current list of VHR countries to add or remove countries, an Amendment must be made to the ABO.



31. Once Ministers have made a decision, officials will issue drafting instructions to PCO to prepare the required amendment order. It is likely that the changes would be ready to be signed by the Minister for COVID-19 Response within 2-3 days of the decision. We therefore advise that a decision consistent with this could be given effect within three days.

## Next Steps

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32. The Ministry of Foreign Affairs and Trade will advise affected foreign governments of any changes to the VHR framework and will require 24 hours before public announcement to do so.
33. Border agencies (including Customs and the Ministry of Transport) will also require 48 hours from the time of decision to implement these changes. This includes providing guidance to Customs frontline staff of the VHR changes (particularly in regard to PDT checking requirements) and to airlines who need to cascade any changes in requirements to overseas-based check in staff (who do not board travellers who are not permitted to enter New Zealand).
34. Following Ministerial decision-making officials will publish the COVID-19 risk assessments of all four countries.


## APPENDIX 1

### Public health risk assessments for India, Pakistan, Brazil and Papua New Guinea

## APPENDIX 2

### Operational implications of additional volume limiting measures

#### Making changes to the MIAS system to restrict the number of travellers from (previously) VHR countries

1. At present, travellers from VHR countries cannot be prevented from booking further rooms in MIQ, if those rooms are available online.
2. MBIE have considered whether further changes to the Managed Isolation Allocation System (MIAS) online booking system are possible to enable the system to reduce the volume of rooms available to travellers from VHR countries, while still making those rooms available to other travellers. In order to do this significant new functionality would need to be built into the way MIAS allocates travellers to rooms.
3. s9(2)(g)(i) 
4. Any system development started now would only have a significant impact on the flow of travellers from early 2022, as MIQ vouchers are now first released five to six months prior to travel date and so significant existing bookings for the rest of 2021 will already be in place by the time any changes could be completed.
5. If changes to MIAS were needed, this would require putting all other current MIQ priority development work on hold for 4-6 weeks – including strengthening our position on bots, ensuring no system vulnerabilities, improving equity of booking processes, and ensuring that vouchers are not held by people without the legal right to enter New Zealand.
6. MBIE are actively investigating options to improve the way traveller itinerary data is matched between MIAS bookings and airline passenger data. This work will improve the quality of the data on traveller itineraries MBIE receives, and allow officials greater scope to detect and manually intervene when passengers enter misleading travel details in an attempt to circumvent VHR country restrictions in the future.

#### Cancelling or manually adjusting MIQ bookings

7. As highlighted above there are currently 771 room bookings by travellers from VHR countries between 13 August and 31 November (just over 7 rooms per day on average). To further stagger the arrival of these travellers, MBIE would need to cancel or amend their bookings.



8. The Chief Executive of MBIE has the power to cancel MIQ vouchers for administrative reasons, such as where the person has booked a MIQ space but does not have the legal right or practical ability to enter New Zealand. However, this does not extend to cancelling bookings for travellers from formerly VHR countries who have both the right and ability to enter New Zealand, unless this was justified on the basis of a Health Order requiring a specific person or class of people to be prevented entry on health grounds.

9. s9(2)(h)

10. While there may be greater legal ability to amend bookings, the low availability of MIQ rooms would further complicate efforts to offer travellers an alternative date that they could both accept and secure a flight for.

11. Either option would be a manual process, requiring significant MIQ staff resource to undertake. Further work would also be required to establish a basis on which to identify which travellers from formerly VHR countries should be subject to cancellation or amendment.

#### Easing travel restrictions from some visa types

12. Travel from HR countries is already limited to New Zealand Citizens and Residents (and their immediate family members), along with those who have a specific border exception (including those on a Critical Purposes Visa).

13. Travel volumes could be limited further for the original VHR countries by easing travel restrictions for some visa types (such as New Zealand Residents) while continuing to restrict travel from other visa types (such as those on a Critical Purposes Visa).

14. s9(2)(h)

15. Those on other visa types who have been granted a border exception are generally coming to New Zealand to support with essential or critical services. For example, India are a significant source of international nurses for New Zealand. We consider that there would be little value in continuing to restrict travel for these workers, given that they help to fill critical skills gaps in the New Zealand economy.

16. Restrictions on some visa types would particularly impact travellers from India. For example, at present there are 654 future MIQ room bookings (1,148 individuals) for travellers from India from 13 August – 31 November 2021. Of these bookings approximately one third (31%) include New Zealand Citizens, one third (34.9%) include New Zealand permanent and temporary Residents and one third (33.9%) include only temporary visa holders (such as immediate family members and those on a Critical Purposes Visa). MIQ bookings for travellers from other Very High-Risk countries are predominantly New Zealanders and their family and restrictions would have very little effect on flows from these countries.

Proactively Released