

Response to COVID-19:

Summary of Advocacy Positions on the Measures/Standards needed for Industry Restart

Purpose

The overall objective of the industry restart project is to enable airlines to resume operations by reducing the risk of aviation being a vector for the spread of COVID-19. This will allow passengers to travel with confidence, enabling aviation to be available to drive economic recovery.

Given the unprecedented nature of the COVID-19 crisis, it is highly likely that risk mitigation measures, specific to COVID-19, will need to be introduced for the foreseeable future in order to facilitate the restoration of air connectivity. However, as much of the science related to COVID-19 is still not clear (e.g. the most effective screening measures and immunity), it is not yet possible to outline specific advocacy positions on some potential measures. Therefore, this note contains the following:

- A summary of the high level, guiding principles behind our advocacy positions on the development and implementation of these risk mitigation measures. As engagement on these measures develops, and new medical evidence arises, it will be possible for these to be translated into more specific advocacy positions.
- A summary of the specific advocacy positions related to the 'System Capability' pillar of the IATA industry restart plan. As these are not dependent on the scientific nature of COVID-19, it is already possible to develop more specific positions.
- A summary of our current assumptions specific to what the passenger process could look like when the industry restarts (recognizing that some still require further medical evidence to support them).

Advocacy Guiding Principles

1. Measures should be supported by scientific evidence and a robust risk assessment
 - Design of measures should be outcome-driven (risk mitigation) rather than solution-driven.
 - For example, social distancing should not be considered as a means in itself.
 - The evidence suggests that the risk of transmission on board aircraft is close to zero, therefore physical distancing (e.g. blocking middle seats) is disproportionate.
 - For other parts of the journey experience, alternative safeguards and measures leading to equivalent levels of protection should be considered.
2. If screening measures are necessary, they should be implemented upstream in the passenger process
 - It is preferable for passengers to arrive at the airport "ready to fly".
 - Reducing queuing and dwell time in airports, and
 - Taking advantage of "trusted traveller principles" where science supports differentiated screening for certain passenger groups (e.g. those considered immune).
 - For international travel, it is preferable for admissibility to be determined at the point of departure,
 - Implying a sterile cabin environment that obviates social distancing onboard, and
 - Requiring mutual recognition of standards by governments at both ends of the journey.
3. Coordination and mutual recognition will be key to restoring air connectivity
 - States should adopt a standardized approach to mitigating the risks associated with COVID-19;
 - The patchwork of restrictions / measures during the 'shutdown' created complexity for airlines and confusion for passengers. A repeat in the restart will significantly slow the recovery;
 - Uncoordinated measures will unnecessarily increase costs for airlines, airports and other supply chain partners.
 - Unilateral measures that differ by country will cause confusion and dent passenger confidence.
 - Mutual recognition between States will be essential to support restoration of international operations.
 - Aviation is a global industry built on global acceptance and implementation of global standards.

4. Measures should only be in place for as long as necessary

- A clear exit strategy covering the lifecycle of temporary operations until the resumption of 'business as usual' is essential:
 - All measures should be kept under constant review;
 - When measures are implemented, criteria for their eventual removal/adjustment are needed;
 - Protocols for more cost-effective/less disruptive solutions to supersede existing measures should be established;
 - The evolution of security measures post-9/11, when unilateral temporary measures became permanent, should be avoided;
- COVID-19 creates an opportunity to build back better by challenging assumptions and evaluating standards, regulations and requirements which may no longer be fit for purpose.

5. Effective collaboration will be key to a successful restart

- Successful adherence to the preceding parameters will require effective and timely collaboration across a wide range of stakeholders:
 - Governments should consult the industry's operational experience to ensure effective implementation with maximum risk mitigation and minimum disruption;
 - Governments must mutually recognize all measures;
 - Effective collaboration will also be required between Government agencies within specific countries (transport, health, customs / immigration, security).

6. Existing roles and responsibilities should be respected in implementing the response to COVID-19

- Each aviation stakeholder has a critical role to play in curbing the current COVID-19 outbreak. Roles and responsibilities should be driven by relevant expertise and training;
 - Airline staff should not be required to conduct COVID-19 testing/health interviews or collect non-standard passenger information not required by airlines.

System Capability: Specific Advocacy Positions

Slots:

- Our initial position is that the winter slot waiver needs to be extended to provide airlines the best opportunity to rebuild a schedule without harming their slot portfolios. We will conduct an analysis of the economics and operational realities related to this hypothesis and if proven to be correct, we will advocate strongly for the waiver extension to be granted in order to facilitate an orderly restart of operations.
- Our position is that in these uncertain times, the Worldwide Airport Slot Guidelines (WASG) offer a system for at least providing some certainty in terms of how slots are allocated. Therefore, we will advocate for the WASG to be respected by regulators as they consider the relaxation of travel restrictions. This includes maintaining the recognized Calendar as the industry driver for the winter and summer schedules planning process.
- Our position is that when and if slots become available within the restart process through industry attrition, they are distributed in a fair and transparent process aligned the WASG principles and policies, not allowing regional distortion or individual airport roles in reallocation. Therefore, we will advocate on this to regulators.

Licenses:

- During the crisis, we need support from the States (Civil Aviation Authorities), to develop globally accepted alleviations on licenses, certificates and rating for all licensed personnel. This requires a harmonised risk-based approach, extending into the restart, to allow the gradual shift back to appropriate regulatory oversight. ICAO has a significant part to play here to ensure that States apply a consistent methodology to alleviations, makes them universally visible and accept other states differences from ICAO SARPs.

- The uncertainty around airspace, health protection, customs and quarantine policies and measures taken by States must be harmonised such that carriers have up to date information. There should be agreement internationally on what protective equipment should be worn by passenger and crew, how to deal with a crew member who tests positive in a foreign state as well as an internationally harmonised approach to testing standards. These standards must be acceptable to all States and have a period of validity e.g. 24 hours for crew members - this could then allow foreign crews or even passengers to travel from their home country through the airport without additional testing.

Certification:

- The unprecedented situation during this crisis requires many alleviations from regulatory requirements due to the measures needed to reduce the spread of COVID-19. Certification and regulatory authorities will be required to grant alleviations. For example, to adapt passenger aircraft for use as cargo only flights, maintenance and audit requirements programmes will need to be adapted to be made and audit requirement, and should be risk-based, to determine appropriate inspection schedules.
- The transition to normal operations will be even more difficult as aircraft not readily accessible, parked at airfields and not necessarily in the order in which they will be used, are brought back into operation. This will require coordination across multiple stakeholders - operators, airports, maintenance organisations and ground service agencies - to ensure aircraft are serviceable when required..
- Audit inspections and approvals will take considerable time to return to normal regulatory oversight regimes. ICAO, States and IATA must demonstrate leadership here by agreeing a consistent, risk-based approach to ensure audit requirements are fulfilled e.g. approvals that are contingent of planned onsite audits.

Supply Chain:

- Through collaboration with ACI, airports and airlines, ensure availability of airport capacity to meet operational requirements, especially with regards to:
 - Timely availability of airport infrastructure;
 - Review of airport operations, e.g. turn-around times for airline network planning.
- For airlines to be able to plan their flights, timely dissemination of information related to changes in airport capacity will be critical.
 - Through collaboration with CANSO, ICAO, ANSPs, and airlines, ensure airspace capacity and efficient/safe ATM operations, especially with regards to:
 - Flight permissions considering that at the beginning of restart, airlines might not adhere to their published Summer/Winter schedules;
 - Timely dissemination of accurate and clear aeronautical information;
 - Capacity constraints and mutual agreement on how to address them, e.g. availability of staff (ATCOs, technicians, etc.) and functional critical ATM infrastructure such as Nav aids.
- Through collaboration with Ground Service Providers (GSPs), airports, and airlines, ensure safety of ground handling procedures and availability of ground handling equipment and licenses/authorized personnel, to support both passenger and cargo flights.
- Work with GSPs and airports to ensure availability of aircraft fuel at airports as air traffic starts picking up.

Travel Experience: Initial Advocacy Positions

In relation to medical elements that are envisioned in the passenger process, our initial thoughts are:

- A medical declaration and contract tracing process would need to be designed and could be added prior to departure on a government portal. Examples of this already exist, and should be harmonized

and interoperable, and managed between the customer and the government agencies requiring this information. Customers would be required to answer an agreed upon set of questions. This could also be part of the entry process in other countries.

- Health status: a symptom screening process allowing customers and crew to self-declare answers to a specific set of questions. This could be implemented at check in and if necessary repeated in the passenger process as an example at the security check point or boarding process and inflight.
- Temperature screening. This too is seen as a potential requirement in the restart. Therefore, we are supportive of implementing this into the passenger process, but this should be as efficient as possible and implemented either at entry point to the terminal building or prior to the security checkpoint, and upon arrival in customs halls or baggage pick up areas.
- COVID Testing. The industry supports the use of testing. However, there are still multiple questions that will need to be addressed with respect to the efficacy of the tests, their reliability and timeliness, i.e. results would need to be produced in minutes. We believe it will be some time before this could be introduced for widespread use, and thus implemented when ready but should not prevent a restart of the industry when all other measures have been operationalized.
- Immunity passports. While there is still much to understand and implement with respect to immunity, we believe that should governments choose to look and implement, it is essential that there is a recognized global standard, that is reliable and implemented electronically and globally recognized.
- Use of PPE (Protective Personal Equipment, such as gloves and masks etc.) IATA supports the initial use of PPE and have already created guidance for crews. Final guidance would be required for customers and airport staff and alternatives to disposable surgical masks defined, however we believe this will be an element of the restart and requires a standard and recommended practices document to be produced.
- Social distancing. With respect to the requirements of social distancing IATA believes this can be managed inside the terminal buildings and some illustrations of this has already been produced by ACI. We support implementing as much as possible distancing throughout the check-in, security and boarding process. However spacing onboard such as blocking rows or middle seats is not sustainable nor required but when load factors permit airlines would make every effort to create additional spacing. Rationale for this is simply the very nature of the aircraft cabin itself. Customers face forward and not each other, seat backs provide a barrier, use of masks onboard would limit exposure, use of HEPA filters and the very nature of the air flow from ceiling to floor and the limited movement onboard aircraft once seated add to the onboard protection. Supplementing this would be additional standard cabin sanitization processes, which could also include wipes provided to customers to clean their spaces around them, and procedures to limit movement onboard and management of bathroom visits to limit contact and queuing.
- Aircraft cleaning. Guidelines and recommendations have already been produced and implemented broadly. IATA supports this and need to finalize and communicate a standard implementation of grooming and sanitization onboard aircraft and in the terminal buildings.

Overarching all these measures, certain elements of the passenger journey will need to be agreed upon and implemented, such as:

- Check-in should be conducted as far out in advance as practical 24-48 hours in advance, and as much as possible completed online
- Airport Terminal buildings should be considered for customer and staff use only, therefore limiting access and reducing the amount of people in the facility

- Self Service options should be promoted and utilized as much as possible to limit contact at all passenger touchpoints and eventually allowing for the greater use of touchless technology and biometrics
- Cleaning and sanitizing of equipment. Airlines, airports and governments need to work together to ensure that equipment is sanitized, and products are made easily available. Standards are required on the frequency and appropriate resources in place to perform the tasks and enforce it. This would apply to things such as carts, trolleys, e-gates, self service kiosks, fingerprint readers, wheelchairs, trays, medical waste disposal containers etc.
- Carry on baggage should be limited to assist throughput at the check points, facilitate a more orderly boarding process and finally limit the number of items onboard that could be contaminated or add to the spread.
- Security check points should practice social distancing, be staffed accordingly and reduce queues and wait times. As we progress this should also include an extensive use of trusted traveller programs and better use of risk assessments coupled with advanced passenger information to improve the process and reduce the friction in the process.
- Boarding Area and process. Additional measures to assist social distancing should be employed and with respect to boarding itself, airlines should consider strict adherence to boarding from back to front, window to aisle. Customers board only when called, and with a reduced cabin baggage should facilitate a more orderly process. Lastly as much as possible self-service should be introduced, self-scanning, and eventually allowing for a greater use of biometrics.
- Inflight – As much as possible limit the amount of movement in the cabin, which would include the need of a washroom visit process to avoid queues and unnecessary contact.
- Disembarking of aircraft will also require a much more orderly process and should be managed by the cabin crew calling rows in sequence again to avoid unnecessary contact, congestion and queuing.

IATA

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