



Western Cape Government submission on COVID-19 Alert Level 1 regulations as it relates to international travel

Purpose:

This submission makes proposals for amendments to the regulations as they relate to international travel into South Africa. Specifically, this submission argues that the same risk mitigation measures which are applied to business and other travellers, a Polymerase Chain Reaction (PCR) test conducted at least 72 hours prior to arrival, should be applied to leisure travellers, regardless of the country of departure and as such that the risk-based country approach should be abandoned.

The motivation for this is that there is no greater risk for transmission of the Covid-19 virus based on the purpose of travel, yet the negative impact of continuing to limit the entry of leisure travellers to South Africa, especially from our key source markets, is severe and extreme. The tourism sector is a major contributor to the economy and employment in South Africa and in the Western Cape. Job losses in this sector are and will continue to be most severely affected by Covid-19 related closures. As international markets are a key driver of the tourism sector, the full reopening of our borders to leisure travellers, with stringent health protocols in place, ahead of the summer season is absolutely critical to the sector's immediate recovery, medium-term stability and long-term survival.

Since the start of this crisis, the tourism sector has adopted world-class health and safety protocols which are being strictly implemented and comprehensively adhered to by tourism establishments and businesses. The Western Cape Government remains confident that the sector has indeed risen to the occasion. For this reason, the Western Cape was awarded the World Travel and Tourism Council (WTTC) 'safe travels' stamp. Within the context of declining COVID-19 cases throughout the country, the ability to recommence international travel between South Africa and all countries in a safe manner is possible.

South Africa has a real opportunity to begin economic recovery by allowing tourists from the Northern Hemisphere, seeking sunshine during their winter months, to visit South Africa during our summer season. The South African tourism sector has adopted excellent health and safety

standards and is ready to safely welcome foreign travellers from all countries. This opportunity will soon be irrevocably lost.

As the regulations stand, leisure tourism will remain severely constrained with risks that jeopardise the survival of the tourism sector and the economic recovery of South Africa and the Western Cape.

Problem statement:

At present there is a differentiation in the regulations between international travellers based on the purpose of travel. Such an approach would seem to indicate that there is greater risk of transmission of the Covid-19 virus should someone travel from a high risk country for leisure purposes than if they travel for business, yet at an epidemiological level this is not the case.

At present a PCR test conducted at least 72 hours prior to arrival in South Africa is required for business and other travellers, regardless of the country of origin. Yet leisure travellers from high risk countries are not permitted entry. Also, the PCR test result has to be signed by a medical practitioner. This is an unnecessary additional administrative burden and does not take into account that in many countries tests are done directly at laboratories, without medical practitioners being involved, and results being sent directly to patients via text message or electronically.

Furthermore, at present the Home Affairs minister has proposed that the list of high risk countries will be reviewed and updated every two weeks. However, any system that introduces uncertainty for travellers that need to plan and book in advance creates an immense barrier for forward bookings. This eliminates a major proportion of tourists who are not willing to take the risk of their country being placed on a high risk list before they have undertaken their trip. In a time when many countries in the world are introducing impractical travel restrictions, South Africa has a real opportunity to stand out and present a sound and efficient travel policy that creates certainty during this time.

At present it is not clear whether a traveller who is required to self-isolate or quarantine can do so at accommodation of their choice or at 'a designated site'. If it is the latter, this potentially creates a double expense for travellers who would likely already have paid for their accommodation and may be required to pay additional accommodation costs. Such expenses would be at the expense of the traveller, as they are unlikely to be covered by travel insurance.

Finally, for business travellers from high risk countries there is currently a requirement to apply in writing to the Home Affairs minister and demonstrate reasons for their request to enter the Republic for business purposes during the period of the national state of disaster. This creates a further administrative burden and will likely lead to further processing delays. It will also lead to unnecessary duplication of requests for business travellers who intend to attend conferences such as the Mining Indaba. It is also unclear whether business travellers can extend their stay in South Africa for leisure purposes, which is where the multiplier effect and economic impact of business tourism is realised.

There should be an additional emphasis placed on business travel for purposes of attending conferences and meetings (business events). There are internationally organised meetings that commence in the beginning of the year, which would be a conduit to kickstart the international meetings calendar years. Delegates and Exhibitors to these events are mostly from our key source markets. This will set a tone for more to follow and will be crucial to allow these markets to travel. A business traveler is often accompanied by a travel companion who then has to conform to the regulations of a leisure traveller, which also creates an additional barrier.

Proposal:

1. Do away with risk-based country categorisation model.
2. Require all travellers to present a PCR test on arrival, conducted at least 72 hours prior to arrival.
3. The PCR test result should not have to be signed by a medical practitioner.
4. Require all travellers to download the Covid-19 alert app and complete the tourist locator form to ensure that details of the trip, including accommodation and length of stay, are captured.
5. Screen all travellers on arrival at the airport by Port Health officials.
6. If a traveller displays any symptoms they will be referred to a dedicated private testing centre at the airport (these will need to be set up), which will be at the travellers own expense. This will prevent the use of public transport to reach testing facilities and therefore will limit the potential spread of the virus.
7. Any travellers who test positive will be required to quarantine at an accommodation venue of their choosing for 10 days and at their own expense.
8. Paperless processes need to be urgently developed for all visa applications and other home affairs processing.
9. Clear and easy to access information needs to be provided on government webpages, which need to be updated regularly.

10. Travellers who visit South Africa for business should be permitted to extend their stay for leisure purposes.

Motivation:

In many countries, including those currently listed as high risk, for example the United Kingdom (UK), PCR tests with a guaranteed result within 72-48 hours cost in the region of £150-£200, which is substantial. It stands to reason that if an individual is prepared to pay such a large sum to get a test then they would likely take every precaution leading up to the test to ensure that it comes back negative and they would be unlikely to risk jeopardising a long-haul trip to South Africa through unnecessary exposure to the virus ahead of their travel.

The requirement of the PCR test, and the associated costs, is in our estimation both a suitable precautionary health measure and a suitable deterrent to risky behaviour prior to travel. Therefore, such a requirement can be applied across the board to all travellers regardless of the purpose of travel or country of origin. This should of course continue to be supported by stringent screening at the airport and thorough and comprehensive safety information on arrival. Importantly, the requirement for a medical practitioner to verify these results should be removed, as this is an unnecessary barrier and, short of having lists of all medical practitioners globally, it does not add an additional layer of certainty to the results.

The current system of reviewing the list of high risk countries regularly, and possibly every two weeks, creates a high level of uncertainty for travellers and an immense barrier, for forward bookings which will have an especially negative impact on the tourism sector. Allowing all travellers to enter South African on the condition of a PCR test conducted at least 72 hours prior to arrival would negate this problem.

The current regulations also do not take into account that a number of foreign nationals own properties in South Africa, for which they pay taxes and levies, yet they are currently barred entry into South Africa and therefore cannot make use of their properties.

Since the start of this crisis, the tourism sector has adopted world-class health and safety protocols which are being strictly implemented and comprehensively adhered to by tourism establishments and businesses. The Western Cape Government remains confident that the sector has indeed risen to the occasion. For this reason, the Western Cape was awarded the World Travel and Tourism Council (WTTC) 'safe travels' stamp. Within the context of declining COVID-19 cases throughout

the country, the ability to recommence international travel between South Africa and all countries in a safe manner is possible.

South Africa has a real opportunity to begin economic recovery by allowing tourists from the Northern Hemisphere, seeking sunshine during their winter months, to visit South Africa during our summer season. The South African tourism sector has adopted excellent health and safety standards and is ready to safely welcome foreign travellers from all countries. This opportunity will soon be irrevocably lost.

As the regulations stand, leisure tourism will remain severely constrained with risks that jeopardise the survival of the tourism sector and the economic recovery of South Africa and the Western Cape.

Economic impact:

According to economic research conducted by Wesgro, in 2019 international tourism contributed R81.2 billion in total foreign direct spend (excluding capital expenditure) in South Africa. In light of Covid-19, job losses are predicted to be most severe in the tourism industry with many companies especially SMMEs ceasing to exist post-Covid-19. In the Western Cape, research by the Department of Economic Development and Tourism estimates that 75 477 jobs are at immediate risk, affecting 43.1% of the industry with a potential loss of 61% of GVA.

The Western Cape is particularly vulnerable to Covid-19 related job losses, as a substantial percentage of tourism businesses are geared towards international markets. Many of these businesses are not able to pivot (entirely) towards domestic markets, as international tourists stay twice as long as domestic tourists and they also spend much more per day per trip. Given disruptions to the school calendar, the domestic travel season might also be much shorter this summer. These motivations further reinforce the importance of international arrivals the tourism sector's recovery, stabilisation and survival.