

Briefing

COVID-19: Arrangements for workforce across red and green airport zones

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To:	Hon Chris Hipkins, Minister for COVID-19 Response		
Copy to:	Hon Dr Ayesha Verrall, Associate Minister for Health		

Contact for telephone discussion

Name	Position	Telephone
Robyn Shearer	Acting Director-General of Health	s 9(2)(a)
Sue Gordon	Deputy Chief Executive, COVID-19 Health System Response	s 9(2)(a)

Minister's office to complete:

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| <input type="checkbox"/> Approved | <input type="checkbox"/> Decline | <input type="checkbox"/> Noted |
| <input type="checkbox"/> Needs change | <input type="checkbox"/> Seen | <input type="checkbox"/> Overtaken by events |
| <input type="checkbox"/> See Minister's Notes | <input type="checkbox"/> Withdrawn | |

Comment:

COVID-19: Arrangements for workforce across red and green airport zones

Security level: IN CONFIDENCE **Date:** 22 April 2021

To: Hon Chris Hipkins, Minister for COVID-19 Response

Copy to: Hon Dr Ayesha Verrall, Associate Minister for Health

Purpose of report

1. This briefing provides information on the current arrangements for airport workers who work in both red and green zones, including the public health rationale for the arrangements and inter-agency advice on front-line operations.
2. Additional options to further manage the public health risk of workers operating between both zones have been provided for your consideration along with an explanation of the operational implications of each option.
3. The Ministry of Transport, New Zealand Customs Service, Immigration New Zealand, the Aviation Security Service, the Ministry for Primary Industries, Auckland and Canterbury District Health Boards have provided input into this briefing.

Summary

4. We have identified four options for you to consider:
 - Option one:** Retain existing arrangements allowing workers to work across red and green zones with enhanced Infection Prevention and Control (IPC) guidance and ongoing monitoring and assurance [recommended]; or
 - Option two:** Request officials to provide further advice and undertake stakeholder engagement to determine the feasibility of requiring complete separation of workforces across red and green zones; or
 - Option three:** Request officials to provide further advice and undertake stakeholder engagement to determine the feasibility of introducing a dedicated workforce requirement for a subset of red zone border workers, defined by those who may be at greater risk of being exposed to COVID-19, based on public health risk assessment of their role; or
 - Option four:** Request officials to provide further advice and undertake stakeholder engagement to determine the feasibility of retaining existing arrangements for workers to work across green and red zones but do not allow this on the same shift.
5. Further policy, agency and stakeholder engagement would be required as a next step with subsequent advice provided to you prior to considering implementation for options 2 - 4.

Recommendations

We recommend you:

a) **Note** that the current arrangements for airport workforce across green and red airport zones are supported by public health advice Yes/No

b) **Note** that the current arrangements are consistent with those operating in New South Wales and are supported by public health advice in that the risk posed by a red zone airport worker working in a green zone part of the airport is assessed as low, given the current controls that are in place for these workers Yes/No

c) **Indicate** your preferred option for the management of airport workforce across green and red airport zones:

Option one: Retain existing arrangements allowing workers to work across red and green zones with enhanced IPC guidance and ongoing monitoring and assurance **[recommended]** Yes/No

Option two: Request officials to provide further advice and undertake stakeholder engagement to determine the feasibility of requiring complete separation of workforces across red and green zones Yes/No

Option three: Request officials to provide further advice and undertake stakeholder engagement to determine the feasibility of introducing a dedicated workforce requirement for a subset of red zone border workers, defined by those who may be at greater risk of being exposed to COVID-19, based on public health risk assessment of their role Yes/No

Option four: Request officials to provide further advice and undertake stakeholder engagement to determine the feasibility of retaining existing arrangements for workers to work across green and red zones but do not allow this on the same shift Yes/No



Sue Gordon

Deputy Chief Executive, COVID-19 Health System Response

Date: 22/4/21



Hon Chris Hipkins

Minister for COVID-19 Response

Date: 4/5/2021

COVID-19: Arrangements for workforce across red and green airport zones

Background

1. Quarantine Free Travel ('QFT') commenced between New Zealand and Australia on Monday 19 April 2021.
2. On commencement of QFT, the Ministry of Health ('The Ministry') advice was that workers could operate across red and green zones providing existing measures (routine testing, vaccination, and IPC measures) are operating effectively. This was supported by the recent successful IPC assurance walk throughs that were undertaken for airports and airlines prior to them being designated as QFT ports and providers.
3. On Tuesday 20 April 2021 the Ministry was notified by ESR of a positive test result for a cleaner of Menzies Aviation at Auckland Airport (Case A), who is involved with the cleaning of 'red' (non-QFT) and 'green' (QFT) zone flights.
4. As a result of this case, we have taken the opportunity to review the Ministry's public health advice to determine if any further action is required to ensure the safety of workers at our international air borders.
5. Although the public health risk of worker infection is low, due to the layers of control in place, it is recognised that the potential impact of a positive COVID-19 case in a border worker that works across both red and green airport zones may be high, in regard to confidence in the continued operation of QFT. As such the Ministry has sought to provide advice on the range of possible options.

Current arrangements for workforce across green and red airport zones

6. Multiple layers of control are in place at airports to protect the safety of workers operating across both red and green zones.

Infection Prevention and Control

7. IPC guidance is in place for airlines and airports which is publicly available on the Ministry website.¹ The document undergoes monthly review.
8. Prior to the commencement of QFT, IPC walkthroughs were undertaken at each QFT airport by the Ministry and regional IPC experts in order to review the operationalisation of IPC guidance. No major issues were identified at any airport, and mitigation measures were enacted in response to each finding prior to QFT commencement.
9. IPC walkthroughs will continue to be undertaken at each airport on a quarterly basis, to ensure IPC controls are continuing to operate effectively.

¹ See <https://www.health.govt.nz/system/files/documents/pages/210326-infection-prevention-and-control-ipc-guidance-v1-1.pdf>

Testing requirements

10. Under the COVID-19 Public Health Response (Required Testing) Order 2020 ('Required Testing Order') an airport is an 'affected airport' if affected aircraft (i.e. non-QFT flights) arrive at it from a location outside New Zealand. All airside workers (other than excluded airport persons)² at affected airports are required to be tested every 7 or 14 days regardless of whether they have worked in red or green zones.
11. An airport which receives only QFT flights is therefore not an affected airport. Queenstown and Wellington Airports are currently the only international airports in New Zealand receiving only QFT flights. Consequently, air border workers at Queenstown and Wellington Airport are not subject to regular mandatory testing. However, they will be required to be tested in accordance with applicable COVID-19 public health protocols if a passenger or aircrew member on a QFT flight is diagnosed with COVID-19.
12. Further, the Border Workforce Testing Register is to be mandatory from 27 April 2021, ensuring greater monitoring of compliance with the Required Testing Order by the Ministry.

Vaccination strategy

13. Border workers captured by the Required Testing Order as well as those that work at Queenstown and Wellington airports, are included in priority rollout of the COVID-19 vaccine, providing another layer of protection against COVID-19 infection.

Contact tracing protocols

14. Contact tracing of anyone who tests positive for COVID-19 includes review of any potential contacts in the airport. Review of CCTV footage rarely identifies close contact events in the airport setting due to compliance with IPC settings. However, in the unlikely event that someone was exposed to a case in a red zone setting on a given day, they would not themselves be immediately infectious to others as the recognised incubation period is usually at least 24 hours. Accordingly, the risk presented from workers moving between red and green zones on a single day is no different to the already low risk that red zone workers present to domestic New Zealand at the time they complete their shift and re-enter the community.
15. Compulsory travel declarations, introduced for all QFT arrivals, ensure the ability to undertake efficient contact tracing, should it be required.

² 'A person who works at an affected airport, and interacts only with international departing passengers (other than international transiting passengers); or works on the airside of the affected airport only in areas that are inaccessible to international arriving or international transiting passengers, and does not interact with international arriving or international transiting passengers on the landside of the affected airport; or a person who is an aircrew member': clause 4, COVID-19 Public Health Response (Required Testing) Order (No 2) 2020

Current implementation of control measures by government agencies and other private entities at the air border

16. We have sought specific information from relevant border agencies as to how current arrangements have been operationalised. This is attached as Appendix 1.
17. A large number of private companies work to support the effective operation of international airports. The Ministry is advised that many of these companies have workers operating across green and red zones – as has been the case for Case A, the Menzies employee. This is in line with the current public health advice.
18. Of further note, QFT flights from the Cook Islands have been safely managed since 21 January – 18 April 2021, with all passengers being processed through the same airport terminal in Auckland as red flight passengers. This was supported by Public Health and the implementation of and adherence to enhanced IPC measures, to mitigate the potential risk of exposure to workers and Cook Island green travellers. Importantly, no new cases of infection in workers or passengers were linked to this process, despite the same border workers being utilised to process both red and green passengers during this period.

Public Health perspective on current arrangements

19. The control measures detailed and the way they have been implemented, indicate that the risk posed by a red zone airport worker working in a green zone is low. This risk is no different to a red zone worker going to a supermarket or fast food restaurant on the way home from work. In addition, all those arriving from green zone flights are wearing masks/face coverings as they travel through the airside areas of the green zone, adding a further layer of assurance to our mitigations.
20. Current public health advice in terms of risks to workers at airports focuses on factors such as likelihood of face to face contact with potentially infected passengers and the length of time of these interactions.
21. We understand that current practice in New South Wales, Australia aligns widely with the approach being followed at New Zealand airports. Staff, including cleaners, can go from the red zone to green zones, with mitigations in place such as ensuring that zones are well demarked and clear signage is displayed for red zone areas to assist worker awareness of the need for disposal of and full change of PPE at the point of entry to either the red or green zone.
22. From a public health perspective, provided the usual red zone precautions for workers are followed while in red zone areas, there is no reason why they could not also work in a green zone area.
23. The Ministry has however identified areas in which guidance on precautions could be strengthened, for example highlighting the importance of ongoing education to ensure staff compliance with PPE and IPC procedures, as detailed in Option 1 below. Adoption, adherence and compliance of this advice remains the responsibility of the employer.
24. Importantly any changes to current arrangements for airport workers should be based on public health advice. Ensuring that there is strong public health rationale for these decisions will enable consistency in application across airports as well as public confidence

in the requirements and mitigations that are in place. Currently there is no clear public health rationale for the separation of workforces across red or green zones.

Options for further consideration

Option 1: Retain existing arrangements allowing workers to work across red and green zones with enhanced IPC guidance and ongoing monitoring and assurance

25. As noted earlier, the risk posed by a red zone airport worker working in a green zone part of the airport on any given day is no different to a red zone worker going to a supermarket or fast food restaurant on the way home from work. If existing controls operate effectively, the potential risk of workers spreading COVID-19 from one part of the airport to another is mitigated.
26. However, given the importance of these controls, we propose the following additional measures:
 - Add to the existing IPC guidance to clarify actions that workers need to take when moving between red and green zones
 - In addition to quarterly IPC walkthroughs, officials will work with local health teams to identify whether they have the capacity to conduct monthly monitoring of IPC protocols at each airport;
 - Develop a range of IPC educational tools for workers to supplement any education and training provided by the employer at the airport to ensure consistent understanding of IPC requirements.
27. Employers have a broad duty of care to ensure the health and safety of their employees.³ Accordingly, when updated guidance is provided, it is the responsibility of the employer to ensure it is effectively communicated to employees and implemented in the workplace.
28. This is the Ministry's preferred option. This approach would have the fewest operational implications for organisations working at the air border, whilst ensuring an increase in guidance and oversight of the measures already in place.

Option 2: Request further advice and undertake stakeholder engagement to determine the feasibility of requiring complete separation of workforces across red and green zones

29. Options 2, 3 and 4 involve entire or partial separation of workforces. Option 2 suggests a total separation of workforces between red and green zones, similar to requirements for health workers at Managed Isolation and Quarantine Facilities (MIQFs). This would require staff at airports to be rostered to either green or red zones. Workers moving from a red zone to a green zone would have to have a two day stand down and return a negative test before moving to work in a green zone.
30. As above, the Ministry advises that there is no clear public health rationale for requiring the separation of workforces.

³ Section 36, Health and Safety at Work Act 2015

31. Any separation of the airport workforce would not be consistent with the approach taken for MIQFs, where only health workers are required to have dedicated employment in managed isolation and quarantine facilities. Other MIQF workers are not restricted in this way.
32. We understand that any separation of workforces would have significant operational and cost implications for agencies and private organisations based on our initial discussions with border agencies. For example, air services might have to be cancelled if there are not enough staff to service them. We recommend that further stakeholder engagement would be required to understand in more detail the cost burden and operational complexity this would add for employers.
33. Additionally, airports are complex environments where staff may cross path in a range of shared communal spaces (e.g. shared lunchrooms) and transport from car parks. Attempts to keep red and green workforces separate in these environments would be operationally complex.
34. Legal and employment consequences are another significant consideration. Legal advice would be required to understand the implications of a dedicated workforce requirement in terms of contractual obligations, which may be further complicated by the number of different employers at the border. Consultation and negotiation with unions would be required for workers covered by collective agreements.
35. Consultations with relevant stakeholders, in relation to options for dedicated workforces, are detailed below.

Ministry for Primary Industries (MPI)

36. MPI operates a model to ensure all biosecurity risk is managed across all pathways, including passengers, cargo, transitional facilities and mail. To achieve this there is a mix of static staff at sites and rotating staff. Any change to this model will require a review of workforce planning, training and competence across all areas. It would require a new way of rostering MPI's biosecurity clearances across the different pathways. Separating the workforce into red and green on a longer-term basis is possible but would come at some cost and would be operationally less efficient.

New Zealand Customs Service (Customs)

37. There are significant implications in managing dedicated work forces in each zone. In Auckland, this would require an additional 61 FTE staff; comprising approximately 32 funded vacancies and an additional 29 staff requiring funding of \$3.5m per annum. Recruitment, on-boarding and training of staff may take up to four months. In Christchurch, modelling has not been conducted but the limited number of scheduled red flights translates to having an under-utilised staff resource that is costly and inefficient.

Immigration New Zealand

38. The Immigration Border workforce is relatively small by border agency standards and international passenger interactions are not routine but are determined by the immigration issues and risks a passenger presents. This is regardless of whether the passenger is from a red or green zone flight. There are currently insufficient staff or facilities to separate teams by red and green zone operations. Additional staff and office facilities would be required, likely prioritised through redeployment but with an estimated lead in time of three months for training and vaccination requirements.

Aviation Security Service (Avsec)

39. The Avsec workforce at Auckland Airport is currently split in two, to separately service international and domestic flights. However, it is not feasible or viable for Avsec to further separate its workforce between green and red zones. Avsec do not have enough staff to do this and is already operating in a constrained staffing environment.

Auckland and Christchurch District Health Board (DHB) staff

40. Canterbury DHB has expressed that they are already under-resourced in regard to health staff. Flight schedules are likely to become more frequent as QFT continues, which will likely require more staff resource. Any further requirement to create a dedicated workforce would seriously compound this issue. Auckland DHB has stated that they may be able to dedicate some staff to red or green zones but that they do not have the capacity at present to split their entire health workforce without serious resource implications.

Other operational staff (commercial entities)

41. The Ministry of Transport has indicated that many commercial entities which employ staff at the air border have been significantly impacted by COVID-19 and that the separation of dedicated workforces is likely to have immediate operational, commercial and logistical implications.
42. Due to the serious operational implications raised by all stakeholders and the lack of public health rationale, the Ministry of Health does not recommend this option.

Option 3: Request further advice and undertake stakeholder engagement to determine the feasibility of operating a dedicated workforce for small groups of workers in the red zone who may be at greater risk of being exposed to COVID-19, based on a public health assessment of their role

43. This option would require the identification of potentially higher risk groups of workers at the airport, based upon public health risk assessment, in order to require them to only work in the red zone.
44. If this option is selected, further public health guidance would be sought on the appropriate factors for assessing the level of risk posed to different workers. One potential approach could be to align with the COVID-19 Public Health Response (Required Testing) Order 2020 and require workers subject to 7-day routine testing to be restricted to the red zone.

45. The concerns outlined in Option 2 are also relevant to Option 3, in terms of both serious operational implications and limited public health rationale. As such the Ministry does not recommend this option.

Option 4: Request further advice and undertake stakeholder engagement to determine the feasibility of retaining existing arrangements for workers to work across green and red zones but do not allow this on the same shift

46. Although this approach is currently being utilised by some border agencies, for the reasons detailed throughout, the Ministry advises that this measure does not provide any increased risk mitigation, as even if a worker was exposed to, and was infected with SARS-CoV-2 (the virus that causes COVID-19) in a red zone during a shift, they would not become immediately infectious should they complete their shift in a green zone area.
47. The concerns outlined in Option 2 are also relevant to Option 4, in terms of both serious operational implications and the lack of public health rationale. As such the Ministry does not recommend this option.

Equity

48. Requiring staff to work only in one zone will place restrictions on working hours and the ability to work certain shifts. This could lead to potential equity issues given staff would be restricted in their ability to earn additional income, and to concerns about discrimination on prohibited grounds especially if the workforce is more likely to be female, Māori or Pacific people or low-income earners. Unless strong countervailing public health risks exist to justify this approach, it could be open to challenge.

Next steps

49. Following the indication of your preferred option, the Ministry will undertake further policy work and stakeholder engagement in order to provide advice to you on the feasibility and progress of implementation.

ENDS.

Appendix 1: Current workforce arrangements for government agencies and other private entities working at the air border

Organisation	Green and red zones in same shift	Green and red zones in same week (without stand down period)	Complete separation between green and red zones	Controls in place
<i>Airlines</i>	No	No	Yes	Air New Zealand uses separate transport for 'red' and 'green' crews and rosters are designed so that there is as little cross-over as possible.
<i>Ministry for Primary Industries</i>	No	Yes	Yes	The current mix of work practices, PPE, hygiene protocols, testing, and vaccinations have ensured that no MPI staff have been infected with COVID-19 at work. All border staff who will be working on the frontline have been vaccinated.
<i>New Zealand Customs Service</i>	Yes	Yes	No	<p>Customs has taken a multi-layered assurance approach to ensure strict adherence to protocols while working at the border. Training is undertaken for donning and doffing techniques and disposal. By 1 May 2021 all border staff in passenger-facing roles will have had their first dose of the vaccine.</p> <p>At Auckland Airport, Customs staff are allocated to red or green duties on a shift. Movement from green to red zones is permitted in exceptional circumstances.</p> <p>At Christchurch Airport, Customs staff are deployed in green and red zones based on limited number of red flights and limited staff resources.</p>

Appendix 1: Current workforce arrangements for government agencies and other private entities working at the air border

Organisation	Green and red zones in same shift	Green and red zones in same week (without stand down period)	Complete separation between green and red zones	Controls in place
<i>Aviation Security (AvSec)</i>	Yes	Yes	No	Avsec advises that it has processes in place and is fully compliant with IPC measures issued by the Ministry of Health. Avsec staff currently wear full protective PPE, gowns, eye protection, and gloves while working in red zones. This includes in relation to staff who interact with hold baggage.
<i>Immigration New Zealand (INZ)</i>	Yes	Yes	No	INZ are fully compliant with Ministry of Health guidelines for infection control. Appropriate PPE is used at all times airside when outside of INZ offices. Strict Health and Safety COVID protocols are used to ensure social distancing and good hygiene during all passenger interactions. 100% of INZ staff have undertaken the vaccine (97% had both doses). 100% of Immigration Border Operations also entered into BWTR to assure compliance with testing requirements.
<i>Canterbury DHB</i>	Yes	Yes	No	Currently Christchurch Airport receives three red flights a week, on Monday, Wednesday and Friday mornings. As such staff are required to work on these arrivals before moving to work on green arrivals later in the day. Limited staff resources mean this is the only viable approach at present.

Appendix 1: Current workforce arrangements for government agencies and other private entities working at the air border

Organisation	Green and red zones in same shift	Green and red zones in same week (without stand down period)	Complete separation between green and red zones	Controls in place
<i>Auckland DHB</i>	Yes (rare)	Yes	No	At present, the Ministry has been informed that staff are rostered to primarily work in either a red or green zone. It is not routine for staff to switch between zones, although this may be required on occasion. There is a shared corridor which staff pass through between red and green zones, with demarcations indicating requirements for PPE and IPC, including the need for a full PPE change. Separate equipment is provided for each zone and all staff undergo a health assessment before commencing work.

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