

Emergency Advisory Group
Advice note
29th July 2021
Revised Public Health Regulations No. 17

The Emergency Advisory Group (EAG) has now considered in more detail the revised public health regulations (the Public Health Protection (Coronavirus) (Amendment) (No.17) Regulations 2021 ("the regulations")) it was asked to review on 22nd July 2021.

Technically the regulations are sound and a detailed description of them can be found at Professor Edge's [blog](#).

The main points of this advice note therefore reiterate the interim advice given on 22nd July 2021.

Context

The EAG believes the context in which these regulations are set is important. The Isle of Man's 14 day notification rate of infection per 100,000¹ is 2992 compared to the UK rate of 798². This means Covid circulation in the Isle of Man is almost four times greater than that in the UK. In the context of the Delta variant, there seems little point in attempting to protect Isle of Man residents from the importation of the virus therefore.

Advice

1. The EAG continues to urge CoMIN to include a requirement in the regulations – now and in future regulations - that the Director of Public Health be asked to provide written advice on all significant areas of policy change rather than just being required to be consulted. The EAG recognises that the national Covid response is a matter that ultimately must be a political decision, but the EAG strongly urges CoMIN to ensure clinical and public health guidance is required to be sought in written form on major policy changes. This will provide transparency and a science led approach to decision making while recognising the role of policy makers in the ultimate determination of the national Covid response.
2. The EAG seeks further clarification on the policy intention or science behind the decision to no longer require children under 12 to self-isolate. It appears to the EAG that the age limit is somewhat arbitrary and will cause some families to be in a position where one child is required to isolate and another is not. The EAG's view is that, given the context set out above, there is little point in restrictions at the border at this point and it adds a layer of bureaucracy to those wishing to travel to and from the Island.
3. The EAG wishes to draw attention to the powers given to CoMIN to make changes to the Public Health regulations during Purdah by direction under new paragraph 3A of regulation 9A as amended. These are significant powers which can be exercised without Tynwald oversight. The EAG notes the sunset clause which already exists in

¹ Using a 14 day sum of 2514 cases as at 1530h on 26/07/21 taken from the dashboard at <https://covid19.gov.im/general-information/latest-updates/> and a population of 84k people.

² Using a 14 day sum of 535153 cases as at 0900 on 26/07/21 taken from the dataset at <https://coronavirus.data.gov.uk/details/cases> and a population of 67,081,000 people.

regulation 6, but urges caution to CoMIN in the exercise of its powers during this period.

4. Noting the context stated above, the EAG considers there is still a risk to the Island from the importation of a Variant of Concern (VoC). The EAG believes that border controls should primarily, under the current context, be used where there is a threat to the Island of the importation of a VoC which is of a high risk as designated by Public Health England. In order to address this threat, the EAG urges CoMIN to consider real time genomic sampling for VoCs. The EAG also advises CoMIN to consider and address the risks which still exist in relation to the importation of VoCs from people who are 2+2 vaccinated, but who may be carrying a VoC.

Finally, the EAG notes that as yet it has not received feedback from the Council of Ministers on its advice notes. The members of the EAG wish to put on record that they are volunteers in unpaid positions who wish to support CoMIN in making decisions for the good of the Isle of Man and are committed to helping the Island succeed in addressing the threats caused by the Covid-19 virus. Further, there is an expectation that both information is provided to, and discussion with the EAG takes place in a timely fashion. We would ask that political comments made reflects these facts.

EAG July 2021

About the Emergency Advisory Group

The Emergency Advisory Group is a committee, appointed by the Council of Ministers, consisting of a range of people from across the community with a broad range of skills and expertise. Its primary role is to consider matters referred to it by CoMIN and provide independent advice and analysis. All its members are unpaid volunteers.

The current membership is:

Hon Graham Cregeen, MHK	Minister for Justice and Home Affairs (Vice Chair)
Rob Mercer, MLC	Tynwald representative
Mrs Jacqueline Bridson	
Mr Steven Christian	
Mr Peter Davidson	
Professor Peter Edge	
Dr Rachel Glover	
Ms Julie Hotchkiss	
Mr John Spellman	Chair
Mr Jonathan Wild	