



Association of Canadian Travel Agencies
Association canadienne des agences de voyages

July 18, 2022

The Hon. Jean-Yves Duclos, P.C., M.P.
Minister of Health
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The Hon. Omar Alghabra, P.C., M.P.
Minister of Transport
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The Hon. Randy Boissonnault, P.C., M.P.
Minister of Tourism
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Dear Ministers,

As mandatory random testing for fully vaccinated travellers is reintroduced, Canada's travel industry is concerned that only evidence of prior infection in the form of a positive molecular test will be accepted in lieu of antigenic testing.

We urge the Government of Canada to include proof of a positive antigenic test, observed by a clinician and conducted within 10 – 180 days prior to travel, as sufficient evidence of recovery for exemption from mandatory random arrival testing for fully vaccinated travellers.

Considering provinces and territories are withholding laboratory testing for high-risk populations, few Canadians have access to molecular testing. However, antigenic tests are widely and freely available, and there are many private services that will clinically observe testing and issue a certificate at low cost.

The current rule creates socioeconomic disparities. Wealthy persons can access private-pay molecular testing, often at a cost over \$200 in order to receive sufficient documentation for an exemption. Conversely, antigenic tests are free throughout Canada, and clinical observation and documentation services are available for approximately \$20.

Antigenic tests have a false positive rate of 0.05%¹ whereas molecular (PCR) tests have double the false positive rate at 0.1%.² Thus, the Government of Canada can have more confidence in a positive antigenic result as being an accurate representation of recovery.

Persons having recovered from COVID-19 can continue testing positive on random arrival tests for up to three months after infection, despite having no active disease. The current rule will lead to Canadians inappropriately subject to federal quarantine despite no active infection, and impact Canada's economic recovery as would-be travellers cancel their plans for fear of being quarantined without just cause.

By adding antigenic tests as eligible under the exemption from mandatory random testing, the Government of Canada would limit inappropriate isolation of Canadians, further equity, promote economic recovery, and in a manner that follows the science.

Sincerely,

Wendy Paradis, President

¹ [False-Positive Results in Rapid Antigen Tests for SARS-CoV-2 | Clinical Pharmacy and Pharmacology | JAMA | JAMA Network](#)

² [False Positive Results With SARS-CoV-2 RT-PCR Tests and How to Evaluate a RT-PCR-Positive Test for the Possibility of a False Positive Result - PMC \(nih.gov\)](#)