



Center for Responsible Travel

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Michelle Bernier-Toth
Acting Deputy Assistant Secretary
Bureau of Consular Affairs
U.S. Department of State
2201 C Street, NW
Washington, DC 20520

Dear Ms. Bernier-Toth:

Thank you very much for hosting the meeting at the State Department Friday, Jan. 12, and for listening to our concerns and answering our questions about the new travel-advisory system. And please extend our deepest gratitude to Ms. Finan-Klimow and Ms. Magallon as well. The meeting was enlightening and will allow us, as travel professionals, to better serve those seeking to travel to Cuba.

With that in mind, we'd like to follow up, first, with a statement, then with several requests and suggestions intended to clarify some of the points made during our meeting and contribute to ongoing efforts to promote and facilitate travel opportunities. They are as follows:

- We strongly disagree with the State Department's decision to rate Cuba at Level 3: Reconsider Travel. We believe this rating is unwarranted given events that have taken place in Cuba. While we remain concerned that U.S. Embassy employees in Havana were stricken with health ailments, there are no confirmed cases of similar ailments among the more than 4 million civilian visitors to Cuba in 2017. And these health incidents occurred within Havana only. In addition, compared with most countries rated 3, and many rated 2, Cuba is far safer and has better health care, a far lower crime rate, and no armed conflict or civil unrest. We believe, based on State Department criteria, that Cuba should instead be rated 2.

Based on your explanation that a 3 rating is mandatory because of the ordered departure of U.S. Embassy staff in Havana, we offer the following:

- We recommend that the language explaining the level 3 rating for Cuba be altered to provide adequate context regarding the health incidents in Havana. We suggest pointing

out that, while 24 U.S. Embassy employees were afflicted with injuries, no similar, on-the-record reports were made by the more than 4 million visitors, including 1 million Americans, who traveled to Cuba in 2017. We also recommend you note that these incidents occurred only in select parts of Havana, not anywhere else in the country—and began more than a year ago and ended in August 2017. Finally, we ask you to include that the incidents precipitated an ordered departure for U.S. Embassy employees in Havana, which, in turn, triggered the 3 rating. We believe these statements would help travelers make more informed choices, and help to allay the fears and confusion of tour operators and educational institutions.

- Please extend our thanks to Ms. Finan-Klimow for sending us a link, after the meeting, to the recently updated Foreign Affairs Manual, which includes the policy stating that any authorized or forced departure of U.S. Embassy staff automatically triggers a level 3 or 4 travel advisory. We would, however, like clarification on the reasons for assessing that the health risk applies beyond Embassy personnel. We point out this wording in the “No Double Standard” policy, which is referenced in the document you’ve provided: “The policy is not intended to prevent the limited distribution of information about threats to specific U.S. citizens/nationals or U.S. organizations. The Department may share credible security-related information on a limited basis *when directed toward a specific target* or when appropriate to counter a particular threat” (emphasis ours). Finally, we’d also like to know which other level 3 or 4 countries were rated that way because of a drawdown in U.S. Embassy staff. Or is Cuba the only one?
- We would also like to see a comprehensive timeline/fact sheet on what has happened, in terms of travel alerts, warnings and advisories regarding Cuba, over the past year—as a follow-up on the State Department’s commitment to support a greater flow of relevant information to the traveling public.
- We would also like to reiterate that, although the travel advisories are intended to help ensure the safety of U.S. citizens, they are causing negative financial impacts as well. U.S. travel companies, universities, NGOs, and other businesses and institutions involved in travel to Cuba have been hurt financially and programmatically, as have businesses in Cuba. We suggest that the State Department monitor the economic impacts of its travel advisories, take into account negative repercussions, and work to create a balance between advising travelers and inadvertently hurting U.S. businesses and educational programs as well as Cuba tourism, which is that country’s leading economic sector.
- As noted during our meeting, the withdrawal of U.S. Embassy personnel in Havana has disrupted the State Department’s ability to measure travel to and from Cuba as well as the issuance of visas for Cubans visiting the United States for various reasons, including familial, scientific, and educational. We, therefore, recommend that you increase that staff number, so that proper accountings of visitations can be made and the visa program for Cubans seeking to travel to the United States be reinstated. Also, given the difficulties Cubans face in obtaining visas, we ask that you consider remote, third-country U.S. consular processing of non-immigrant visa applications, with only the final pick-up required by Cuban applicants at the U.S. Embassy in Havana. And, to lessen the pressure

on U.S. consular staff, we ask that expanded use be made of Cuban in-country nationals in the administrative aspects of visa processing in Havana.

We look forward to hearing from you on these matters, and seek to help you, in any way we can, to resolve the concerns about the current Cuba rating.

Thank you very much,

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