



22<sup>nd</sup> November 2021

The Rt Hon. Nicola Sturgeon MSP  
First Minister  
Scottish Government  
St. Andrew's House  
Regent Road  
Edinburgh  
EH1 3DG

Dear *Nicola*,

### **COVID-19 Restrictions on Businesses**

Scotland's business community supports the public health measures in place to ensure the safety and well-being of our employees, customers, suppliers, and communities. As you know, the Scottish Chambers of Commerce (SCC) have supported a number of Scottish Government public health communications, including most recently a joint statement from Scottish Business Groups with the Cabinet Secretary for Finance and the Economy, Kate Forbes MSP, encouraging vaccine uptake on 2<sup>nd</sup> July 2021.

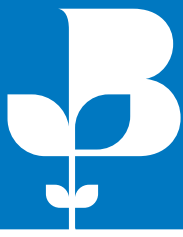
The SCC Network and Scotland's businesses want to continue working in partnership with the Scottish Government to ensure the economy remains open and growing. However, having had the opportunity to review the Scottish Government's vaccine certification evidence paper update (published 19<sup>th</sup> November), we remain unconvinced that the public health benefits of an extension to the scheme outweigh the negatives for individuals, businesses and the economy.

From the outset our members have been clear that vaccine certification acts as an economic deterrent, placing additional costs on businesses with no additional support from Government to help them meet these costs, and there remains little evidence that the scheme is effective in reducing transmission.

Many businesses won't survive 2022 without a significant financial boost over the festive period and the evidence paper highlights that extending vaccine certification has the potential to lock nearly one in three (31%) 18 to 29-year-olds out of pubs, restaurants, cafes, theatres and cinemas under the current rules. This will have a damaging impact on businesses and as the paper notes will be likely to cause "displacement" to "less regulated settings", such as house parties, which will present even more opportunities for transmission of the virus.

The suggestions of a return to table service in hospitality, caps on venue capacity and the reintroduction of curfews would in reality mean a return to an economic, if not social, lockdown which would cause severe economic harm to Scotland's businesses at a critical point in their recovery.

On home working, the modelling being put forward by the Scottish Government fails to demonstrate that 'workplace' transmission is taking place in office settings, and with office occupancy and return rates remaining low, a further encouragement of home working will have a devastating impact on our town and city centre economies, which rely on office worker footfall, and which are already struggling to adjust to changes in consumer behaviour and competition from on-line retailers.



A return to a stronger message on encouraging home working from the Scottish Government, after months of collaborative working with businesses during which it was agreed that a gradual and phased return to offices could be done safely would be a considerable step backwards.

The evidence for encouraging increased home working remains opaque and the Scottish Government should maintain its position that decisions over office return should be left to businesses, in discussion with their employees. There is no justification for offices being singled out once again as a key transmission point when many businesses have invested millions in ensuring workplaces are safe for staff, customers and clients.

The positive economic forecasts from the Scottish Fiscal Commission and others which have projected a return to pre-pandemic levels of growth in Scotland by early next year are all predicated on there being no return of restrictions.

Our recent snap poll of businesses detailed that almost a quarter of Scottish firms fear that further Covid-19 measures will have a severe financial impact on their business. Additionally, 65% of firms were against any extension of vaccine certification being extended to more hospitality and leisure venues, increased home working, and enhanced requirements for face coverings.

Our members views are that any expansion of vaccine certification, enhanced COVID-19 baseline preventative measures or greater encouragement of home working by the Scottish Government will jeopardize Scotland's return to economic growth, create further uncertainty for businesses and undermine consumer confidence once again.

And the report cites research undertaken by YouGov for the Scottish Government also demonstrates public opposition to further measures being introduced. The proportion who would like to see the vaccine certification scheme rolled out to other types of events and venues is at 45%, and just 33% agree that it will encourage more people to go to these venues/events.

On behalf of the Accredited Chambers of Commerce across Scotland and the 12,500 member companies which collectively support in excess of 50% of all private sector jobs in Scotland, we strongly urge the Scottish Government to reconsider the reintroduction of restrictions and allow Scotland's economic recovery to continue, unhindered, at pace.

We have included a brief appendix detailing the key areas our members have raised with us. We understand the challenging circumstances that the pandemic presents to us all. As always, we are available to discuss these points further with you and your officials.

Yours Sincerely,

Dr. Liz Cameron OBE  
Director & Chief Executive  
Scottish Chambers of Commerce



## **Appendix**

### **Lack of Evidence Base**

From our interpretation, the Scottish Government evidence paper does not make a compelling case that vaccine certification is having a significant impact on halting the spread of the virus.

The evidence paper notes that the impact of certification “cannot be measured directly”, however acknowledges that further restrictions could reduce footfall and turnover for affected businesses and may also trigger requests for refunds, further impacting cashflow.

Our members do not believe that the paper lays out an adequate evidence base on which to justify the extension of baseline protective measures or vaccine certification at this time.

### **Additional Business Costs**

The costs for business will include additional resource for recruiting or training staff to check certification, dedicated hardware to scan or read certification, potential cancellations or refunds, and loss of revenue from people who decide not to attend.

The evidence paper states that “it is currently not possible to give an estimate of the overall magnitude of additional staff costs”. More than half of businesses in the accommodation and food service sector are already reporting shortage of workers, with an acute shortage of SIA-accredited door staff, a requirement of some licensed premises.

The paper further states that trade bodies have warned of the threat of cancelled Christmas bookings, together with reduced footfall, on the viability of debt-laden businesses.

Finally, the papers conclusion that “incomplete information about the longer-term effects of vaccine passports on the pandemic, wider society and the economy” indicates that this paper cannot and should not be used as sufficient evidence for vaccine certification expansion at what is a critical time for business recovery.

### **Equalities Concerns**

SCC continue to believe that as a matter of principal the Vaccine Certification scheme creates several equalities challenges for businesses and individuals.

Our main concern in relation to the Scottish Government evidence paper is that extension of the scheme will lock nearly one in three (31%) 18 to 29-year-olds out of pubs, restaurants, cafes, theatres and cinemas under the current rules.

The Scottish Government has stated that one aim of vaccine certification is to increase vaccine take-up in this age group, however statistics show that take-up is rising faster in England, where there is no domestic vaccine certification scheme in place.

### **Displacement**

The evidence paper acknowledges that those who remain unvaccinated, do not have access to vaccine certification, or choose not to participate in the scheme remain likely to continue to interact with others in unregulated indoors settings, such as with family and friends in homes.

The paper also acknowledges this, admitting that restricting access to venues risks “displacement” to “less regulated settings”, and as such this displacement has the potential to increase case numbers further, whilst denying businesses (which with the baseline restrictions already in place will be many times safer than domestic settings) vital winter trade.

The Scottish Government advise that vaccine certification is required to reduce rising case numbers. However, recent Scottish Government data indicates that across Scotland’s regions on average there are between 300-600 COVID-19 positive people per 100,000 population, indicating that at any one time around 99.4% of Scotland’s population are not infectious.

Whilst businesses acknowledge the annual winter pressure that is placed on the NHS and its hard-working staff, we do not accept that these pressures are coming significantly from COVID-19 cases.

Government data states that acute hospital admissions are on the decrease for COVID-19 cases and indeed the pressures on the health service are arising from non-COVID-19 related caseloads.

The increase in hospital admissions is in Accident and Emergency, not hospital Covid wards. Last December there were 1,000 covid patients plus 19,000 A&E admissions per week. Now we have 777 people in hospital plus 24,000 weekly A&E admissions.

The evidence paper acknowledges that hospital and ICU admissions due to Covid-19 are “plateauing” and there is “no certainty” on whether admissions will increase or decrease in the months ahead.

### **Additional Lateral Flow Test Burden**

SCC are concerned over the proposals set out in the evidence paper that suggest, **in addition** to Vaccine Certification, evidence of a negative Lateral Flow Test (LFT) may also be required.

This two-factor verification would create additional burdens for businesses and evidences the ineffectiveness of vaccine certification, which does nothing to stop someone who is Covid-19 positive entering a leisure or hospitality setting.

The evidence from COP26 clearly showed that lateral flow test results can be far more effective in tracking down the virus and keeping people safe.

LFTs provide an on the day snapshot of an individual’s Covid-19 status, helping ascertain who is carrying the virus and who isn’t, and they remove the need to share private medical data with someone who is not a medical professional.

## Understanding the European Context

The current wave of infections across Europe which has resulted in the reimposition of restrictions in the Netherlands and lockdown in Austria is largely being driven by the surge in the more infectious Delta variant, which has been the dominant variant in the UK for some time.

Additionally, only 42.1% of the population in Austria are fully vaccinated, which is one of the lowest rates in Europe. Compare this to the 96% of over 40s and 88.1% of over 18s are double vaccinated in Scotland, the highest rates in the UK, and it's clear that comparisons between infection rates here and those in Europe cannot be made easily.

Based on this, we do not believe that Scotland's current COVID-19 case rate, combined with the higher vaccination rates justify the reimplementing of restrictions such as is being pursued by governments in other parts of Europe.

## SCC Network Research

Please see the findings of a recent (12<sup>th</sup> November) Scottish Chambers of Commerce Network snap poll of Scotland's business communities on their attitudes and views relating to the extension of vaccine certification and baseline restrictions. The poll was conducted online and opened on Wednesday 10<sup>th</sup> November at midday and closed on Friday 12<sup>th</sup> November at midday. A total of 673 responses were received. Headline results:

National sample size 673

- **436 (65%) stated their business was not supportive of further restrictions being introduced**
- **159 (24%) told us the additional restrictions would have the most severe financial impact on their business**
- On a scale of 1-10, the average response to the question: 'How will the implementation of further restrictions impact the financial performance of your business?' was 4.9/10
- 45% of respondents told us they do not believe the current level of restrictions are justified

Aberdeen & Grampian Chamber of Commerce sample size 382

- **69% stated their business was not supportive of further restrictions being introduced**
- **28% told us the additional restrictions would have the most severe financial impact on their business**
- On a scale of 1-10, the average response to the question: 'How will the implementation of further restrictions impact the financial performance of your business?' was **6.0/10**
- 52% of respondents told us they do not believe the current level of restrictions are justified

**ENDS**