

3rd September 2021

First Minister Nicola Sturgeon MSP
St Andrew's House
Regent Road, Edinburgh
EH1 3DG

Our ref: SCC/FM/02092021

Dear First Minister,

COVID-19 Vaccine Certification

Throughout the pandemic, businesses in Scotland have done everything at their disposal to keep their clients, customers and employees safe, complying with legislation and guidance wherever necessary and investing millions in safety measures to prevent transmission of the virus.

Even today, with Scotland no longer operating within the levels system, many businesses are going beyond what is legally required of them to help halt transmission and keep case numbers down.

The removal of restrictions has allowed businesses, many of which remained shuttered for over 18 months, to finally open their doors again and Scotland's economy is now finally beginning to recover. The fact remains however that many businesses continue to operate in survival mode.

We know that economic recovery is fragile and the long-term viability of many businesses and jobs remains in the balance. Instead of rebuilding consumer confidence, frequent announcements around potential return of restrictions or implementation of vaccine certificates, is proving damaging and costly to business and consumer confidence.

With many lifeline business support measures, such as furlough, coming to and end in only a matter of weeks, mounting business debt and growing supply chain issues, businesses are deeply concerned about increasing costs and administrative burdens exacerbating an already delicate situation.

Following the announcement that these vaccine certifications may be required for entry to nightclubs and many large events in Scotland from later this month, we have taken time to engage with our members on this prospect. I have outlined the key concerns that our members have raised with us directly:

1. **Sectoral & Consumer Burdens:** Businesses are concerned that vaccination certification would add yet another layer of administrative burden to sectors that have already been amongst the hardest hit. They have also raised the additional burdens on consumers and their confidence at a time when sectors are working hard to safely attract customers back. Through our initial conversations with businesses, we understand those operating in the live events sector are putting in place contingency plans including considering cancelling events or re-organising for elsewhere in the U.K., putting Scotland at a further economic disadvantage.
2. **Timelines:** our members have raised concerns over the pace at which certifications are to be deployed, the specific outcome set to be achieved and the end date of utilising this measure. Without clarity on these points, this measure will be viewed as an additional economic deterrent and runs the risk of making it more difficult for these sectors to restart and recover.
3. **Evidence:** We urge the publication of specific evidence and modelling which demonstrates how vaccine certifications will reduce transmission in the settings that will require vaccine certification to be presented.

4. **Guidance:** SCC has committed to working with officials to develop the guidance for vaccine certifications. Currently, our members have expressed anxiety and uncertainty around areas such as enforcement and monitoring as well as confusion over the definitions of which businesses the certifications will apply to.
5. **Employees:** We note there are no plans to include key services or settings where people have no choice over attendance, however, we would welcome clarity from the Scottish Government as to whether this exemption will include staff that work in the settings that certificates will be required.
6. **Vaccine Uptake:** We will continue to support vaccine roll-out and uptake as the route back to normality. Data from Public Health Scotlandⁱ highlights the overall success of vaccine uptake, with over 100% coverage of both first and second vaccine doses for those aged 60 and above, and the initial justifications for introducing restrictions were linked to protecting those most vulnerable to the virus, including older people and those with underlying health conditions, all groups which have now been fully vaccinated. Seeking to encourage maximum vaccine take-up is of course a laudable aspiration, however vaccine certifications, particularly when this measure can be seen to be targeted at influencing the actions of specific groups such as younger people, raises a range of ethical and moral issues.
7. **Strategic Framework:** Businesses have spent the last year playing their role in keeping people safe and case numbers as low as possible and the data shows the success of the vaccination programme has effectively broken the link between infections, hospital admissions and deaths, and there appears to be little risk of the NHS becoming overwhelmed with Covid-19 cases. The Scottish Government's strategy is to now *"suppress the virus to a level consistent with alleviating its harms while we recover and rebuild for a better future"* and whilst businesses were relieved when Scotland moved beyond level 0 last month, many will see the introduction of vaccine certificates as effectively a restriction in itself.

We would ask that the Scottish Government seriously consider the concerns of our members and give due consideration to the points we have raised. We remain available to discuss these matters with your Ministers and officials.

Yours Sincerely,



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

Reference

ⁱ Public Health Scotland – Total Coverage by Age Group Scotland - https://public.tableau.com/app/profile/phs.covid.19/viz/COVID-19DailyDashboard_15960160643010/Overview