

Reflections of the Plataforma Pymes on the health intervention of Spain by the EU in the face of insufficient NPI measures against COVID-19 in the face of the advance of variants of concern.

The Plataforma Pymes issues this statement in view of the unfavourable evolution of pandemic control in Spain through the insufficient application of Non Pharmaceutical Interventions (NPI) measures in comparison with what would be applied in the rest of Europe (where a lockdown+shutdown+stay at home order, with compulsory teleworking and suspension of attendance in compulsory education, as a complementary strategy to vaccination), as a consequence of COVID-19 and above all due to the appearance of its different variants of concern (VOC).

The data would be an average of between 24,000 and 28,000 positives in the last 14 days, with a 14-day a cumulative COVID-19 case notification rate that has not managed to fall below 800, an average of 30,000 hospitalisations since 8 January, with an average of 1,000 admissions per day since that date, nearly 5,000 admitted to ICUs on average also since that date, when the United Kingdom and Germany with a larger population do not reach this figure and what is more serious is an average in the last 14 days of 260 deaths per day, which would mean reaching monthly figures of some 8,000 deaths.

The Plataforma Pymes, as it has been stating in various statements since April, advocates notably reducing the Public Health risks caused by the virus as an essential step to initiate economic recovery, assuming the implementation of NPIs that could entail the temporary suspension of non-essential productive activities, developed by SMEs and the self-employed, as an instrument to reduce the mentioned risk, provided that these NPIs were accompanied by public economic compensation in favour of the suspended non-essential activities.

As the ECDC in several of its documents, the latest of which is dated 1 February 2021 "Integrated Covid-19 response in the vaccination era", the Plataforma Pymes supports not only focusing on a vaccination strategy, which could be extended to vaccines produced outside Western countries as long as they are validated by the European Medicines Agency, but also maintaining NPI measures in parallel, as a criterion of prudence, while the vaccination process continues and the efficacy and safety results on a significant population sample are reliably known, especially in relation to the variants of concern, as well as while the differential advantages that the variants of concern may have acquired, such as greater transmissibility and severity, are analysed and known. In this document, the ECDC models that the variants of concern will be 100% predominant by the end of February, indicating that many of the current NPIs will not be sufficient to curb an increase in mortality in this scenario of predominance of variants of concern, even if the vaccination process is being implemented.

Both in the last European Council held on 21 January 2021, and in the European Commission agreements of 25 January 2021, it was decided to classify Spain as a "dark red" area within

the EU member states due to its high level of virus incidence and the absence of the adoption of stricter NPI measures, such as those of the German and British models.

For the Plataforma Pymes, the decision of the European Council and the European Commission could be interpreted as an implicit Public Health Intervention of Spain by the EU, in the framework of the Health Union principle, endorsed by the European Parliament, which would have the purpose that Spain would soon have to declare a lockdown+shutdown+stay at home, with the suspension of attendance in schools and the imposition of compulsory teleworking, in addition to the NPI measures already adopted by the Autonomous Regions.

Moreover, as a technical complement to the European Council's decision of 21 January, the ECDC, in relation to the variants of concern and before the European Council, issued a report pointing out the high risk of increased transmission and also of severity, recommending the adoption of more restrictive NPI measures for those member states that had not yet adopted them, in a clear implicit allusion to Spain.

Following this report, in Spain, the Ministry of Health's Coordination Centre for Health Alerts and Emergencies (CAES in its Spanish acronym) issued a "conservative" report on the matter, dated 20 January, which limited itself to reflecting the ECDC's considerations without going any further.

In the ECDC document of 21 January 2021, the need to control virus variants through genomic sequencing of positive cases was established. The ideal figure was set at sequencing between 5% and 10% of positives. And it was indicated what % was sequenced in Europe at that time: Denmark 15%, UK 5% and other countries 0.07%, including Spain.

While the level of sequencing across Europe was generally low, at least all countries had adopted very strict NPI measures, with the exception of Spain, to protect against variants of concern. The ECDC also stated that its laboratory could assist with sequencing if samples were sent to it. This was ratified last week by the European Commission, in the recommendation that indirectly and in the Plataforma Pymes view, Spain was sanitarily intervened as it had a cumulative COVID-19 case notification rate above 500 and had not adopted stricter NPI measures.

Now forced by the ECDC and the European Commission, Spain would adopt a sequencing strategy but at the minimum level proposed by the ECDC, even below:

1. Only 1-2% sequencing would be established, far from the 5-10% recommended by the ECDC.
2. The ECDC's proposal for laboratory assistance would not be taken up.
3. It would be established that 80% of the samples to be analysed for positives would come from hospital care and 20% from primary care, leaving out samples of positives taken privately.

4. NPIs would not be tightened to fight against variants.
5. It would not be established which laboratories and how many would be the ones that would sequence in each Autonomous Community.

However, the CAES has issued a new report on 26 January, in which it modifies substantial aspects of its report of 20/01, indicating that the situation regarding variants of concern is already very worrying. The Plataforma Pymes praises the courage of this new CAES report.

On 5 February 2021, the CAES updated its document on the variants of concern and although this document no longer appears on the corresponding web page, giving the impression that it had been withdrawn, it once again shows its growing concern, concluding that the presence of variants of concern B1.1.1.7 in Spain may lead to an increase in the incidence and possibly the rate of hospitalisation and lethality in our country in the coming weeks. However, unlike its report of 26 January, there is no section of recommendations in which it proposes the intensification of NPIs.

The Plataforma Pymes reiterates its recognition of the courage of the CAES and urges it to consider including in its report the possibility of introducing, as a recommendation, the intensification of NPI, following the British and German model.

To this must be added the call by the President of the European Commission at a conference held on 31 January with pharmaceutical CEOs, insisting on the need to pay special attention to the possibility of variants of concern reducing the effectiveness of vaccines. And the call by the US FDA on 4/02 for pharmaceutical companies to start studying in depth the effects of variants of concern on the effectiveness of vaccines.

The most significant changes in the report of 26 January compared to that of 20 January are as follows:

1. The update of the report would be justified not only by the increased virulence but also by the increased lethality and incorporates studies of the neutralising capacity of the variants of concern, in particular B 1.1.7, which is the one sequenced in the UK, from the antibodies.
2. It is pointed out that the B 1.1.7 variants of concern are unlikely to cause escape from vaccine protection, but in the report of 20 January there was not even a mention of this.
3. It considers that the risk of dissemination is very high. In the 20 January report it spoke of risk of introduction and spread. References to introduction had been removed, so it would implicitly recognise that it was already in Spain. The new report maintains that this variant in our country could lead to an increase in incidence with higher hospitalisation and lethality rates than those expected from the incidence rate in the coming weeks.
4. The risk of vaccine leakage is considered low, but in the report of 20 January this

risk did not even appear.

5. Several Autonomous Regions have reported very rapid increases in incidence due to the variant. The report of 20 January did not make this reference.
6. Infected people would appear to be at greater risk of suffering a more severe disease with a higher risk of death in all age ranges.
7. The variant would not, in principle, affect the effectiveness of natural or vaccine-induced immunity. In the report of 20 January this reference did not appear.
8. It is recommended to apply non-pharmacological control measures (NPI) already used for the containment of the virus in an intensified way. In the 20 January report, this recommendation appeared but was limited to persons with variants of concern and their contacts and certain areas. In the new report it would be recommended in general. It could be interpreted as the prelude to the LOCKDOWN+SHUTDOWN+STAY AT HOME German and British models.

In order to be prudent in the face of the advance of the variants of concern, the Plataforma Pymes proposes that Spain should pay attention to the conclusions that different countries will draw over the next few days from their current vaccination programmes and NPI measures of lockdown+shutdown+stay at home, with compulsory teleworking and suspension of school attendance:

1. The United Kingdom will draw before the end of February on the effectiveness of its current lockdown and vaccination process in the face of the advance of the variants of concern.
2. The same in Israel, which, despite its vaccination process, is resisting the lifting of the suspension of school attendance.
3. Germany, which the week of 8 February will re-evaluate whether to continue with its current NPI, with the imposition of compulsory teleworking and the suspension of presence in schools.
4. France which imposed on the week of 1 February the deepening of compulsory teleworking.
5. Italy, which in the event that Draghi becomes President of the Council of Ministers, will have to analyse what strategy it adopts with regard to COVID: the British and German model with stricter NPI measures or the Spanish model, which is much more lax, with the French model on the road between the two models.

In addition, on 28 January, in a public appearance after the meeting of the Interterritorial Health Council, the director of the Ministry of Health's Centre for the Coordination of Health Alerts and Emergencies indicated that, according to CAES criteria, it would be time to make a final effort for 14-15 days to radically control transmission as soon as possible.

It is clear that there is a high level of concern about the variants of concern that have appeared, and more specifically about the British variant.

All of the above, and with the concern expressed by the director of CAES, makes it necessary to take significant NPI measures to curb the transmissibility of COVID and its variants of concern. Otherwise, without a secure vaccination schedule and without confidence in vaccine manufacturers' compliance with deadlines, as AstraZeneca has shown in the last week, the debacle will be historic.

As tourism is one of the main economic engines of our country, today the arrival of tourists could not be guaranteed, Spain being one of the 3 countries in the "Blood Red" zone of the European traffic light and this will undoubtedly cause a serious deficit in the financing capacity of the Spanish economy during the year 2021, which in the absence of final data for 2020, could have entered into negative balance, seriously endangering the financial viability of Spain in the international financial markets.

From the Plataforma Pymes, we again request the implementation of NPI measures complementary to the existing ones, without reaching an obligatory and permanent home confinement as in March and April (stay at home order), such as the obligation of teleworking, suspension of attendance in compulsory education ... The suspension of attendance in any activity declared non-essential, should be compensated according to the equity losses compared to previous years, as other EU Member States are already doing.

We support the request of our member organisation PIMEC for a 40% write-off on ICO loans to SMEs and the self-employed, and that it be given zero tax treatment for corporate tax purposes by considering this write-off as an undistributed profit. We also support the measures requested by our member UATAE for special attention for the self-employed in the most affected sectors (attached document), among which we highlight the moratorium by the banks on financial obligations for loans, financial leases and exemption from self-employment fees for those self-employed who cannot access the benefit for termination of activity.

All these measures must be accompanied by the Spanish government's immediate request for a bailout with conditionality, accompanied by far-reaching structural reforms to reactivate productive capacity. It is also necessary to immediately request the ESM, to use it to carry out a rapid and effective vaccination campaign, accompanied by the purchase of vaccines in addition to those acquired from the EU, to be completed before June, and with which to reinforce the health system, as otherwise the impact on the tourism and catering sectors, among others, will be irreparable for this year.

Summary: there are no funds to increase sequencing, but neither is the 20 billion Mede requested for health spending, as Spain is not stigmatised as a bailed-out country, and with which we could increase sequencing capacity, increase vaccination capacity and the acquisition of vaccines, and strengthen our health system and support the health workers themselves, who have been exposed to an inhuman physical and psychological strain for almost a year now. An economic rescue with conditionality, accompanied by structural reforms, and the application for the ESM, is imperative.