

COVID-19 PANDEMIC BUSINESS RELIEF: A COMPARATIVE STUDY OF SOUTH AFRICA AND SELECTED EUROPEAN COUNTRIES

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Abstract: The novel coronavirus, also known as Covid-19, has affected people globally. The reality of reduced working hours set in, and a contraction in consumer demand and business confidence began, leading to a reduction in spending and investment. Travel restrictions were put in place, trade was halted, and most of the way we were used to living changed drastically. To combat economic losses and complete economic shutdown, governments were forced to rollout relief policies to aid businesses and reduce financial losses. These policies include tax and bank payment holidays, underwriting of loans, job retention schemes, value-added tax (VAT) deferrals, grants, and mortgage breaks. This study aimed to analyse the support policies that several European countries applied to assist businesses and compare them to South Africa. The study followed a qualitative exploratory research design using secondary data obtained from several open-source documents obtained from various government and non-governmental websites. Thematic analysis using Atlas.ti was used to analyse and report the data. Five themes emanated from the study: Business stability measures, Social support, Post-Covid recovery measures, Liquidity measures for businesses and Transmission prevention. In comparison with South Africa, several similarities were present in the Disaster Management Tax Relief Administration Bill. Yet, despite the commonalities that persist and the fact that South Africa shares in the spirit of the themes applied by the European nations, it is comparatively weaker when the breadth and scale of its interventions are compared.

Keywords: Business; business support; Covid-19; European countries; intervention; policy; South Africa.

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Introduction

Covid-19 has had a noticeably significant impact on every aspect of human existence. Its effect will persist for a long time in terms of lives lost and people's physical and mental well-being globally. Economic activity and the resources generated through it,

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allow people to live a comfortable life and are thus key factors second only to immediate survival and social stability. However, poverty and inequality, civil unrest and crime propagate where economic activity is insufficient. As such economic recovery is a matter that cannot be put aside until the pandemic is over, requiring concurrent attention with health initiatives. However, despite the urgency of economic recovery, not all nations will overcome Covid-19 with the same efficacy or at the same rate. As such, best practice policies must be identified which could aid in assisting other economies, specifically, those of developing countries who can tap into this knowledge to improve or adjust relief and intervention policies.

The first cases of Covid-19 were reported to originate in Wuhan's Huanan Seafood Wholesale Market in January 2020. By the first week of January 2020, China's Centre for Disease Control (CDC) reported the novel coronavirus known today as SARS-CoV-2 and Covid-19 as the causative agent for the outbreak (Xinhuanet, 2020). Later, in January 2020, the European Centre for Disease Prevention and Control (ECDC, 2021) reported that the virus had spread to Europe via France. Germany and Italy were the second and third to register cases in the EU (ECDC, 2021). By March 2020, Covid-19 had been reported to have affected all European Union (EU) members and the European Economic Area (EEA) (EU, 2020). By mid-April 2020, the EU reported that the countries most severely affected by Covid-19 were Spain, Germany, and Italy, with cases exceeding 100,000 and France with between 50,000 and 100,000 (EU, 2020). Spain has reported more than 3.65 million cases, Germany has had 3.65 million, and Italy 4.22 million cases. France is still the hardest hit European country, with 5.9 million cases to date (Steward, 2021).

To combat the spread of Covid-19, social distancing, prohibition of public gatherings, school closures, and border/travel restrictions were applied (EU, 2020). These restrictions prevented viral transmission to ease the strain on healthcare systems; however, this did not come without social and economic costs and resulted in a global economic slowdown and temporary and disaggregated standstills. To combat economic losses and complete economic shutdown, governments were forced to rollout relief policies to aid businesses and reduce economic losses. These policies include tax and bank payment holidays, underwriting of loans, job retention schemes, value-added tax (VAT) deferments, grants, and mortgage breaks (Williams, 2020). The Global Entrepreneurship Monitor (GEM, 2021) states that two in every three households have seen a decline in household income globally out of a sample of 140 000 small businesses. However, European nations limited that reduction in revenue to one in every three families surveyed (GEM, 2021). The economic interventions applied by European countries have thus proven to be effective in regulating economic decline to a lesser degree despite the continued transmission of Covid-19 and the recent surge of infections in Western Europe.

Given the still-growing trend of infections, it is highly likely that most nations will once again apply interventions that curb the spread of Covid-19. However, since Europe has shown itself effective in reducing the economic decline that preventative actions engender, this study analyses the business support policies that they have applied in comparison with South Africa's and thereby elucidate best practices that might be replicated to amplify South Africa's recovery.

Literature Review

The Covid-19 pandemic and the subsequent response to it is a layered concept that must be holistically examined in order to make sense of the policy interventions that have been applied to address it. For instance, many studies have verified the positive relationship between life expectancy and economic welfare and growth (McKibbin & Fernando, 2020). The threat of infection created a sociological response that saw people panic buying and clamouring for supplies at the pandemic's beginning. However, after the initial spike in consumption, the reality of reduced working hours set in, and a contraction in consumer demand and business confidence began, leading to a reduction in spending and investment in turn (Bloom & Carangal-San, 2005). To minimise the spread of the virus, travel restrictions were put into place, trade was halted, and most of the way we were used to living changed drastically. Those very restrictions inhibited the delivery of goods and services and resulted in a further reduction in the flow of economic goods and the accompanying compensation. As liquidity and personal funds slowly dried up, so too did the factors of production systematically slow down, decreasing supply. This was the beginning of a major global economic decline. The International Monetary Fund (IMF) estimates that economies under significant strain have resulted in a worldwide economic growth contraction of 3.5% (IMF, 2021). Although the introduction of vaccines created some optimism, the surges of infections, logistical issues, uncertainty about vaccine side effects, and renewed lockdowns are likely to further strain economies globally (IMF, 2020). This translates to a joint supply and demand shock in macroeconomic terms, resulting in inflationary effects and amplifying inequality and poverty if not addressed appropriately (Todaro & Smith, 2011).

From a Keynesian perspective, suppressed consumer income confidence suppressed demand and slowed economic recovery and growth. While the demand and supply shifts occur and the subsequent market forces adjust the economic outlook, large institutions and governments seek to find the delicate equilibrium between efforts supporting citizens and maintaining profitability, promoting public safety (Cockburn et al., 1969; Wang et al., 2008). Furthermore, globalisation has resulted in national specialisations in producing goods that create higher quantities at lower costs than is capable otherwise (Wu et al., 2017). This has created focal points of production and

specialisations that are geographically concentrated, and thereby, structural interdependence has been fostered. Globalisation depends on trade and travel between nations as there is a difference in the productive capacities and resource availabilities between countries (Saunders-Hastings and Krewski, 2016). When countries are inhibited from exchanging resources, products, or skilled labour, globalisation cannot take effect, and where it previously was the norm, it results in a subsequent economic contraction (Henderson, 2016; Wang et al., 2020). This reality of interconnectedness means that the economic efficiencies that functioned prior to the pandemic to be reestablished require that the global economy recover, not in isolation to the rest, but extensively. Therefore, the covid recovery discussion cannot be effectively addressed unless it includes our international trading partners. However, before we can meaningfully dialogue with the global business community, it is essential to understand the immediate and lasting effects of large scale viral outbreaks.

The macroeconomic effects of the 2006 SARS epidemic were increased business operating costs, large reductions in economic consumption and re-evaluation of country risks resulting in increased risk premiums (McKibbin & Fernando, 2020). What is of significance is that the magnitude of the economic shock caused by the epidemic was in proportion to the exposure of a nation and the susceptibility of the population to the disease (McKibbin & Fernando, 2020). The proportionality of this effect is of particular importance as it lends credence to the concept that developing countries, or countries with low credit ratings, will have greater recovery challenges as attaining investments will be more difficult due to a lack of confidence in the credibility of a nation.

Mahler et al. (2020) expand on this concept by stipulating that the vulnerability to Covid-19 is contingent and inversely related to the robustness of an economy and directly related to the number of people living close to the international poverty line. According to the Department of Statistics South Africa (StatsSA) (2019), approximately 49.2% of South Africans live below the upper-bound poverty line. This means that despite the relatively low number of deaths and infections, South Africa and Sub-Saharan Africa could be some of the regions hit hardest in terms of increased extreme poverty and economic recovery (Mahler et al., 2020). The economic forecast for South Africa is a 3.1% increase in Gross Domestic Product (GDP) for 2021 and 2% for 2022 (IMF, 2021) that leaves it below the global average. For the first time in 20 years, the number of people in poverty will increase, resulting from the Covid-19 pandemic and developing nations being the hardest hit (Martini et al., 2019; Lakner et al., 2021). To offset the economic slowdown, reduced trade, reduced workforce, increase in poverty, and financial burden of health and safety policies, governments launched policy initiatives abroad and locally to provide businesses with additional support and accelerate economic recovery (Martini et al., 2019).

Europe has multiple governments and multiple policies that are enforceable through numerous federal agencies. This variation provides a plurality of cases, with the potential for heterogeneous novelty in the solutions to address covid, and a basis to observe the homogenous and traditional economic solutions developed through business management and economics. The Asiatic nations were considered inappropriate for this study because the rate of infection in some of the principal countries (e.g. China) has reported such low numbers of infected that the realistic effect of covid policies and interventions cannot be aptly measured. The nations selected are shown in the methodology along with the selection process applied in this study.

Methodology

The study followed a qualitative exploratory research design using secondary data obtained from several open-source documents obtained from various government and non-governmental websites. Document selection leading to thematic analysis was used to analyse and report on the data. Several European countries were selected based on their economic recovery response towards the Covid-19 pandemic. The countries included in the sample were Austria, Belgium, Denmark, Finland, France, Germany, Ireland, Italy, Netherlands, Norway, South Africa (comparative only), Spain, Sweden and the United Kingdom.

After selecting the relevant documents (policies, financial documents, relief statements etc.) from the chosen countries, they were prepared and added in Atlas.ti version 9. This software was deemed most appropriate as it is a specially designed research tool used to analyse qualitative data—the software assists in creating network diagrams and data visualisation, resulting in a structured way to identify themes. The following steps were followed during the research process:

Step 1: The selected source documents were copied into the programme.

Step 2: The content was coded, and quotes that grounded the codes were aggregated.

Step 3: The codes were compiled into code groups that related to the research question.

Step 4: The code groups were merged into each other to form themes that act as representative families of actions and interventions applied.

Step 5: The data were analysed. The report was prepared from the themes that applied some quotes to understand the most pertinent content better and emphasise the weight of the themes generated. During this portion, the South African particularities were also drawn into the report and discussed to answer the research question.

Results and discussion

The study aimed to identify the major business relief policy measures taken by selected European nations and compare those to how South Africa responded. The process of coding produced a total of 587 quotations, 53 codes, and five themes. The codes and code groupings are shown in Appendix A. For the sake of brevity, only select quotations are brought forth in discussing each theme. The themes were classified into three categories, major, moderate and minor themes, based on the number of codes applied to each. Two themes were considered major as more than half of all the themes applied to them. The first major theme is Business stability measures, and the second is Social support. Each of these themes accounted for 33/54 of the codes in the study. Post-Covid recovery measures and Liquidity measures for businesses were the two moderate themes accounting for 13/54 of the codes in the study. Finally, Transmission prevention accounted for the only minor theme, with 7 out of 54 codes relevant to it.

Theme 1: Business stability measures

The first major theme, *Business stability measures*, accounted for all the government and institutional partners' endeavours to stabilise the business environment through their support. These support initiatives came through easing taxes and repayments of credit and loans employing state guarantees, acceleration of administrative processes, and funding schemes. The following excerpts best illustrate the breadth of the European business interventions.

Figure 1 represents the codes contributing to the first theme.



Figure 1: Business stability measures

Source: Own compilation (Illustrated in Atlas.ti 9)

France: "Any company in difficulty as a result of the health crisis could postpone, without penalty, the payments of direct taxes due... Upon request to the competent tax center without justification by submitting a simplified form" (Seroin et al., 2020).

Sweden: "...the state guarantees 70 per cent of new loans from the banks to companies that, due to the consequences of the new corona virus, have encountered financial difficulties, but otherwise are viable. The guarantee is issued to the banks, which in turn issue guaranteed loans to the companies. The loan guarantee is primarily aimed at

small and medium-sized companies, but there is no formal limit on the size of the company to participate in the program" (Graner et al., 2020).

Theme 2: Social support

The second major theme, Societal support, was identified and dealt with ensuring societal stability. The first line of defending social security was to maintain as much employment as possible within the country. Where economic slowdown threatened working hours or illness would keep people off work, the state sought to incentivise companies to keep people on regardless of economic activity or sickness.

Germany: "In accordance with the social security law, grants from the employer for short-time and seasonal short-time allowance are exempt from tax up to 80 percent of the difference between the target-wage and the actual wage." (Jochimsen et al., 2020).

Denmark: "Sick leave benefits are normally provided by the employer in the first month of illness, however now, if related to Covid-19, the government will cover these" (Schmidt et al., 2020). Where direct employment support measures fell short, second-line measures extended to funds being attributed for business survival, retraining, reskilling, opportunities for youth and funds attributable to start-ups and other entrepreneurial ventures.

Italy: "... employer associations and trade unions can implement specific agreements to... redefine working hours, organisational and production needs and allocate a number of working hours to training courses. The costs of training courses... will be covered by a special fund called the "New Skills Fund"..." (Tronconi et al., 2020).

The United Kingdom: "An employment support scheme targeted at those aged 16-24 ... who are at risk of long-term unemployment. (in which) the government will cover the cost of the first six months of employee's wages, ...National Insurance contributions and minimum automatic enrolment pension contributions" (Woodward et al., 2020).

Figure 2 represents the codes contributing to the theme referring to social support.

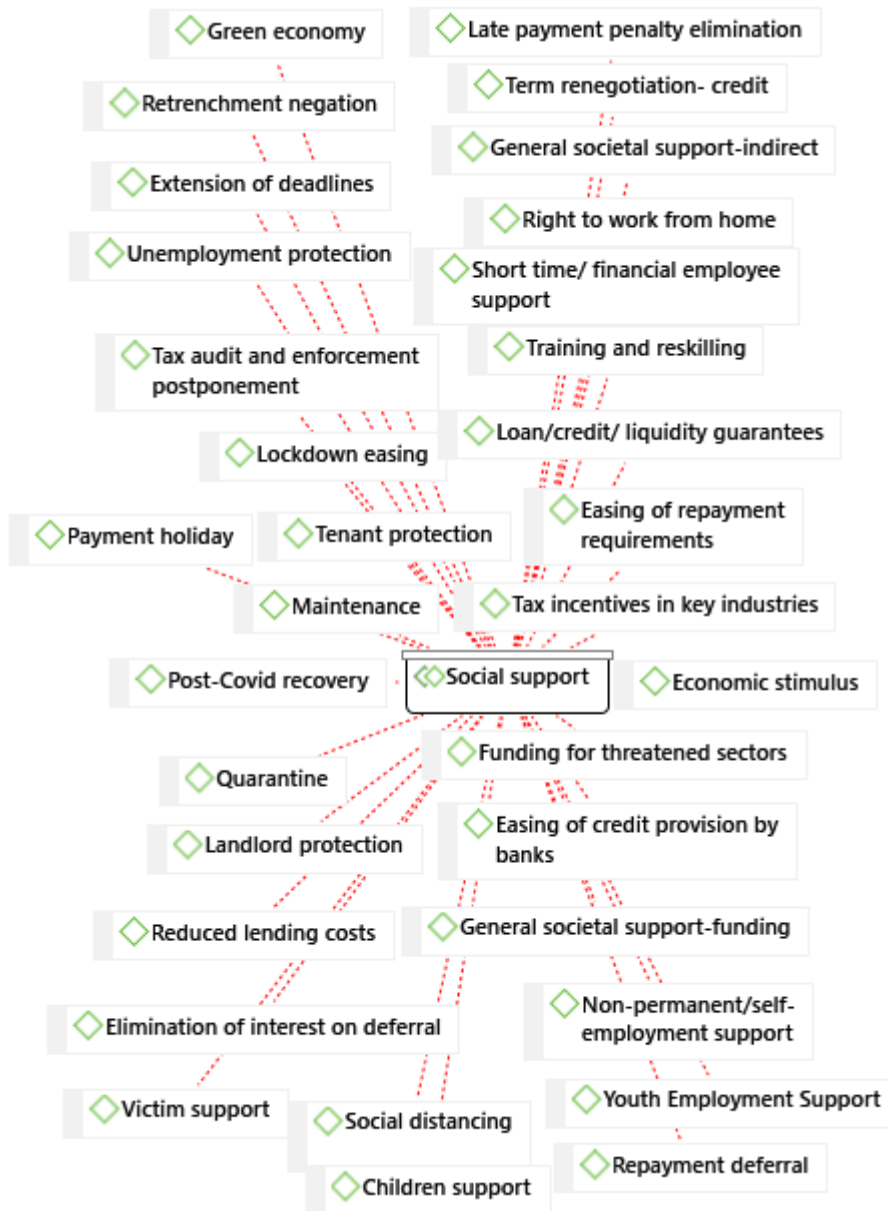


Figure 2: Social support
Source: Own compilation (Illustrated in Atlas.ti 9)

Entrepreneurship as a tool for Social Security was particularly evident in countries such as the Netherlands, with many of their policies and interventions being oriented towards enabling people towards self-sufficiency instead of chronic state aid.

Netherlands: "...a € 4,000 tax exempt reimbursement was granted to entrepreneurs..(in addition to)...a new scheme, the Overhead Compensation SMEs ...can be applied for by SME entrepreneurs ...(and if they qualify) be compensated for their overhead up to a maximum of € 50,000 for four months...this compensation will also be tax-exempt" (Verhulst et al., 2020).

Theme 3: Post-Covid recovery measures

The third theme was Post Covid recovery measures which were put in place by the European nations. Interestingly, the European countries' solutions to the Covid-19 epidemic remain attentive to the developmental goals of the EU. This includes green energy considerations and modernising their economies. The main crux of the post-Covid recovery measures is to have a systematic recovery from the pandemic without severe or lasting social, economic, or developmental side effects. To this end, the easing of payments, economic stimulus, targeted sector funding, green economy investments, support for the most severely affected, and training and reskilling are required.

Figure 3 depicts the codes contributing to the third theme.

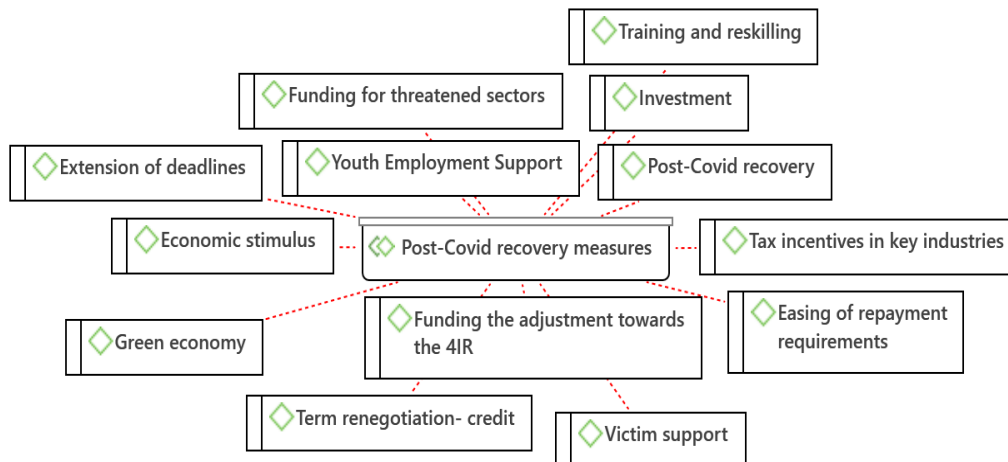


Figure 3: Post-Covid recovery measures
Source: Own compilation (Illustrated in Atlas.ti 9)

Of all the examples that the analysis provided, Germany's is perhaps the most telling of how large a priority recovery is.

Germany: "€100 billion has been allocated for direct recapitalisation measures to ensure the solvency of companies...€400 billion for guarantees that help companies to counteract liquidity bottlenecks (and) refinance themselves on the capital market...€100 billion to refinance the KfW (Kreditanstalt für Wiederaufbau) in the implementation of the special programs assigned to it" (Jochimsen et al., 2020).

Theme 4: Liquidity measures for businesses

Without liquidity, bills and wages cannot be paid, supplies cannot be bought, and the costs of doing business cannot be covered until new liquid capital flows in. From the analysis, the provision of liquidity was a clear priority to policymakers. Policymakers sought to amplify liquidity throughout Europe through tax deferrals and exemptions, funding, economic stimulus, deferring repayment on loans, guarantees for loans, and credit. Spain provides a clear example:

Spain: "Approval of a credit line whereby the State shall cover the financing extended by financial institutions to companies and self-employed persons. (Art. 29)...up to EUR 100,000 million in guarantees for funding provided by credit institutions" (Pizarro et al., 2020).

Figure 4 reflects the codes contributing to this theme.

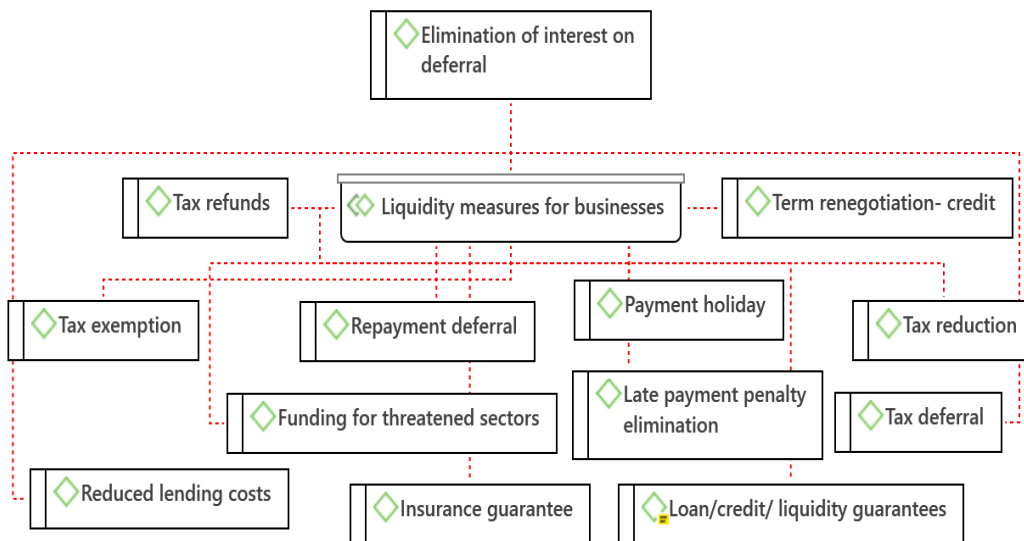


Figure 4: Liquidity measures for businesses
Source: Own compilation (Illustrated in Atlas.ti 9)

Theme 5: Transmission prevention

The fifth theme identified was the efforts taken to prevent transmission of Covid-19. Lockdowns were applied, travel restrictions of people and selected goods were implemented, the tax and excise duties on imported medical goods were removed to encourage the sale and purchase thereof. However, beyond the fundamental healthcare narrative that has been perpetuated since the start of Covid-19 that stresses social distancing and the protective equipment that one must wear when in social environments, the rest of the content of this theme lies outside the scope of this paper. It was also only considered a minor theme, with only 7 out of 54 codes relevant to this theme.

Figure 5 reflects the codes contributing to this last theme.

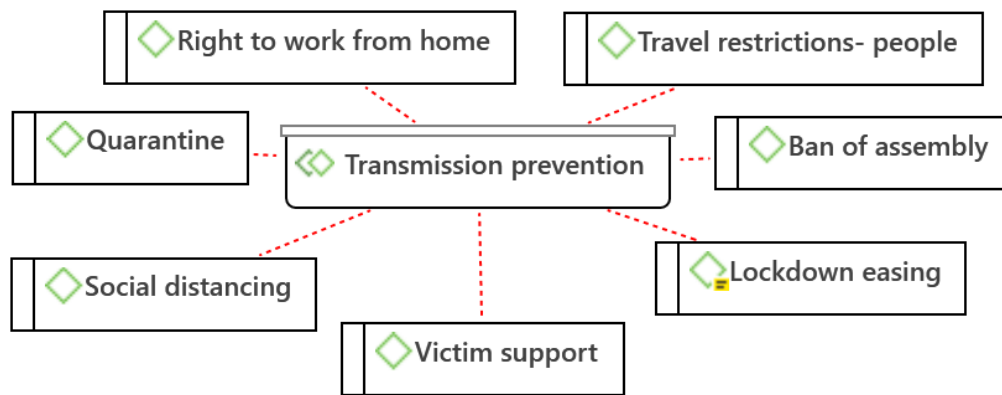


Figure 5: Transmission prevention

Source: Own compilation (Illustrated in Atlas.ti 9)

Comparison between South Africa and the European cases

When one compares the similarities between South Africa and European nations, using the codes extracted from analysis, many parallels can be drawn in the actions taken. A direct comparison can best be made through the Disaster Management Tax Relief Administration Bill, which are the business and societal interventions which manifest as tax deferrals and deductions, the reduction of interest on deferred repayments and extension of deadlines, youth employment schemes, temporary unemployment aid and direct social funding and support (Botha & Duffy, 2020).

Yet, despite the commonalities that persist and the fact that South Africa shares in the spirit of the themes applied by the European nations, it is comparatively impotent when the breadth and scale of its interventions are compared. The underlying reality is that

European economies are substantially stronger than South Africa, with European schemes support funding being multiples of the entire South African GDP. However, despite being dwarfed in scope and magnitude of effect, South Africa has maintained a low death count despite weakened facilities. Furthermore, the policies applied to keep the same central foci: Business support, societal cohesion, and healthcare services, with the priority being on health (Botha, 2020). Due to the fact that South Africa does not have the reserves or societal stability of European nations, the need for taxation remains a constant need to circumvent a complete collapse of governance. However, this places additional strain on an already ailing South African Economy.

Conclusions and Recommendations

This study aimed to analyse the support policies that several European countries applied to assist businesses and compare these to South Africa. The following themes were derived from the various documents included in the analysis: Business stability measures, Social support, Post-Covid recovery measures, Liquidity measures for businesses and Transmission prevention. All of these themes are critical to the recovery process of the various countries. Some countries applied more rigid interventions. However, this was more viable in developed countries in the higher income band, such as most of the selected European countries in this study. Developing country economies are at a disadvantage as they may not have enough resources to implement such progressive interventions and relief strategies. In addition, these countries are, as a result of the pandemic, more inclined to be negatively affected by social issues, such as poverty, unemployment and lack of proper healthcare services, compared to richer, more developed economies. Therefore, a fine equilibrium between reducing infection rates and keeping economic activity at a productive level is needed. South Africa performed well in this regard, and timely interventions assisted in the uncontrolled spread of the virus, as seen in some European countries with huge numbers of infections and deaths. Unfortunately, this was at some economic cost, and many businesses felt the direct impact of the interventions. Unfortunately, the covid relief and assistance strategies were in many cases slow to reach the intended parties, and intense red-tape, regulations, corruption, and limited resources saw this intended relief not reach businesses quick enough or not even at all.

South Africa needs to amplify the liquidity made available to productive and profitable businesses. Moreover, the economic stimulus will be essential for recovery and growth. From a managerial perspective, relief policies should be reviewed regularly and updated according to the need and level of severity. In addition, lockdown restrictions should be monitored and implemented in such a way as not to reduce economic activity to an unacceptable level, restricting people from making a living. What came to light is that several initiatives to assist business were present (i.e.

Unemployment Insurance Fund [UIF] and Pay as You Earn [PAYE]). Still, businesses either did not know of this, were unaware of finding this information or did not know how to apply. This could be addressed by more effective campaigns and assistance to help, especially small and micro businesses, on the processes to follow. As many of the contact sales of services and products were limited or decreased, support to businesses on how to run e-businesses would be extremely helpful. Many smaller businesses are uneducated on this and do not have the relevant sources to set up these types of businesses. Instead of providing these smaller companies with 'survival' funding, specialised consultants, as part of, for example, a government relief initiative or even private-sector relief, could aid in the long-term sustainability of these businesses by assisting them with e-business setup. Thus making use of technology may prove useful as a new value proposition. This may also help businesses to develop a better market access strategy.

Institutions and governments seek to find the delicate equilibrium between supporting citizens, maintaining profitability, and promoting public safety. Unfortunately, the vulnerability of poorer economies to Covid-19 is contingent and inversely related to the robustness of an economy. This study addressed an interesting and important topic related to Covid-19 pandemic relief strategies. However, it is not without its limitations. Only some countries were selected, including more countries in the sample, and thus more policy and intervention documents may have resulted in additional themes. Furthermore, a deeper comparison between the selected European countries and South Africa can be made. This will be addressed in a follow-up study. Other sources used to collect data and subsequent themes included in the analysis but not used directly to emphasise some of the findings included: Ireland - Gavin et al. (2020); Finland – Laaksonen et al. (2020); Norway – Liland and Skinstad (2020); Austria – Plott (2020) and Belgium – Warson et al. (nd).

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COVID-19 PANDEMIC BUSINESS RELIEF: BADANIE PORÓWNAWCZE RPA I WYBRANYCH KRAJÓW EUROPEJSKICH

Streszczenie: Nowy koronawirus, znany również jako Covid-19, dotknął ludzi na całym świecie. Nastąpiła rzeczywistość skróconych godzin pracy i zaczęło się zmniejszanie popytu konsumentów i zaufania przedsiębiorców, co doprowadziło do zmniejszenia wydatków i inwestycji. Wprowadzono ograniczenia w podróżowaniu, wstrzymano handel, a większość sposobu, w jaki przywykliśmy do życia, drastycznie się zmieniła. Aby zwalczyć straty gospodarcze i całkowite zamknięcie gospodarki, rządy zostały zmuszone do wprowadzenia polityki pomocy, aby pomóc przedsiębiorstwom i zmniejszyć straty finansowe. Zasady te obejmują dni wolne od podatków i płatności bankowych, gwarantowanie pożyczek, programy utrzymania pracy, odroczenia podatku od wartości dodanej (VAT), dotacje i przerwy w spłacie kredytu hipotecznego. Badanie to miało na celu przeanalizowanie polityk wsparcia stosowanych przez kilka krajów europejskich w celu pomocy przedsiębiorstwom i porównanie ich z RPA. Badanie przebiegało zgodnie z projektem jakościowych badań eksploracyjnych z wykorzystaniem danych wtórnych uzyskanych z kilku dokumentów o otwartym kodzie źródłowym uzyskanych z różnych rządowych i pozarządowych stron internetowych. Do analizy i raportowania danych wykorzystano analizę tematyczną za pomocą Atlas.ti. Z badania wyłoniło się pięć tematów: Środki stabilności biznesu, Wsparcie społeczne, Środki naprawcze po Covid, Środki płynności dla przedsiębiorstw oraz Zapobieganie przesyle. W porównaniu z Republiką Południowej Afryki, w ustawie dotyczącej zarządzania ulgami podatkowymi dotyczącymi zarządzania klęskami żywiołowymi było kilka podobieństw. Jednak pomimo utrzymujących się cech wspólnych i faktu, że Republika Południowej Afryki podziela ducha tematów stosowanych przez narody europejskie, jest ona stosunkowo słabsza, gdy porównuje się zakres i skalę jej interwencji.

Słowa kluczowe: Biznes; wsparcie biznesowe; Covid19; Kraje europejskie; interwencja; polityka; Afryka Południowa.

COVID-19 大流行的商业救济:南非和选定的欧洲国家的比较研究

摘要:新型冠状病毒,也称为 Covid-19,已影响到全球人民。减少工作时间的现实开始出现,消费者需求和商业信心开始收缩,导致支出和投资减少。旅行限制到位,贸易停止,我们习惯的大部分生活方式发生了巨大变化。为了应对经济损失和彻底关闭经济,各国政府被迫推出救济政策以帮助企业并减少经济损失。这些政策包括税收和银行付款假期、贷款承销、工作保留计划、增值税(VAT)延期、赠款和抵押贷款减免。本研究旨在分析几个欧洲国家用于协助企业的支持政策,并将其与南非进行比较。该研究遵循定性探索性研究设计,使用从各种政府和非政府网站获得的几个开源文件中获得的二手数据。使用 Atlas.ti 进行专题分析来分析和报告数据。该研究提出了五个主题:企业稳定措施、社会支持、Covid 后恢复措施、企业流动性措施和传播预防。与南非相比,灾害管理税收减免管理法案有几个相似之处。然而,尽管存在共同点,并且南非与欧洲国家所应用的主题精神相同,但在比较其干预的广度和规模时,它相对较弱。

关键词:商业;贸易支持;新冠肺炎;欧洲国家;干涉;政策;南非。