



Food & Beverage ISSUE ALLIANCE

Submitted electronically via regulations.gov

September 4, 2020

The National Academies of Sciences, Engineering, and Medicine
Ad Hoc Committee on Equitable Allocation of Vaccine for the Novel
Coronavirus
500 Fifth Street, NW
Washington, DC 20001

**Re: Discussion Draft of the Preliminary Framework for Equitable
Allocation of COVID-19 Vaccine; Project HMD-HSP-20-20**

To Whom It May Concern:

As organizations representing the food, agriculture, retail and consumer packaged goods (CPG) supply chain, we thank the ad hoc committee of the National Academies of Sciences, Engineering, and Medicine (NASEM) for its leadership and ongoing efforts to develop a framework for COVID-19 vaccine allocation. We are pleased the Centers for Disease Control and Prevention and National Institutes of Health have asked this distinguished group for guidance and appreciate the opportunity to share insight from our respective memberships.

Early on in the pandemic, the federal government designated the food and agriculture sector as part of the nation's critical infrastructure to keep the food supply chain running and Americans nourished during the ongoing health crisis as part of the U.S. Department of Homeland Security's (DHS) [*Guidance on the Essential Critical Infrastructure Workforce*](#). Therefore, our members have been on the front lines of the response to the ongoing public health emergency by continuing operations and ensuring Americans have access to safe, nutritious, and affordable food. Despite a range of challenges to fulfilling unprecedented demand during the pandemic, the industry has proven to be resilient and the supply chain remains intact.

Given scientists have advised that COVID-19 will remain a continuous public health concern, the importance of a vaccine to prevent additional infections and future outbreaks cannot be overstated. Strong federal government leadership is needed in developing a practicable and achievable vaccine allocation and distribution program once a safe, effective COVID-19 vaccine is developed. Critical infrastructure sectors, as well as state and local authorities, need clear, consistent, and detailed directions from the federal government on core issues like vaccine allocation and distribution. Effective guidance developed through an interagency process will be a key component of an orderly, phased approach to vaccination.

With respect to the draft framework for vaccine allocation, we are deeply appreciative to the committee for prioritizing food and agriculture sector critical workers in Phase 2 and Phase 3 of the draft framework, after our nation's frontline health care personnel, first responders and certain high-risk individuals. The food, agriculture, CPG, and retail industries are critical to a functional society. Yet, within the food sector, the draft report differentiates between production workers in certain segments of the industry, who would be allocated vaccines in Phase 2, and production workers in other sectors and "white collar" workers, who would be included in Phase 3. Specifically, the draft report includes in Phase 2 "workers in the U.S. food supply system who plant, harvest and package crops; slaughter and process meat; deliver food to stores and stock shelves and staff checkout lines," as well as "workers in warehouse and fulfillment centers." However, restaurant workers and workers "in factories or other goods producing facilities" are included in Phase 3. Restaurant workers and workers in food manufacturing facilities face on-the-job exposure and yet are a critical link in the food supply chain and a vital part of the U.S. economy. We respectfully ask the committee to also include workers in food manufacturing and restaurant industry workers in Phase 2.

Also, consumers, retailers and the food/agriculture sector are being directed to use cleaning supplies, sanitizers, disinfectants and other hygienic supplies to prevent the spread of COVID-19. The workers supporting the manufacture of personal hygiene, household, and commercial cleaning products, are a recognized as a top tier component of our nation's critical infrastructure as detailed in the DHS Guidance for Essential Critical Infrastructure Workers. These workers make products necessary to clean, disinfect, sanitize and ensure the cleanliness of healthcare facilities, shelters, schools, residential homes, food production facilities, and other essential commercial operations. These household and commercial cleaning products, combined with protections provided through personal hygiene products, are integral to preventing the spread of viruses and, most importantly, enabling the distribution and execution of a vaccination campaign. These essential critical

infrastructure workers supporting the manufacture and distribution of products necessary to reduce the spread of viruses and execute safe vaccinations with products necessary for cleaning, disinfecting, sanitizers and maintaining good personal hygiene should be designated as critical workers in Phase 2 and Phase 3, accordingly.

Prioritizing vaccinations for food, agriculture, retail, and CPG workers will be a key intervention to help keep the supply chain operating, while those designated to receive the vaccine later continue to observe safety and distancing measures in their communities.

The food, agriculture, CPG, retail and foodservice industries will continue to fulfill the “special responsibility” critical infrastructure industries carry, and we are proud our industry’s workforce selflessly persevered to feed America. Again, we thank the National Academies’ Ad Hoc Committee on Equitable Allocation of Vaccine for the Novel Coronavirus and appreciate your consideration.

Respectfully submitted,

American Bakers Association
American Frozen Food Institute
American Spice Trade Association
AIB International
Consumer Brands Association
FMI – The Food Industry Association
Global Cold Chain Alliance
International Bottled Water Association
International Dairy Foods Association
International Foodservice Distributors Association
National Chicken Council
National Confectioners Association
National Fisheries Institute
National Pasta Association
National Restaurant Association
National Seasoning Manufacturers Association
The Sugar Association
United Egg Producers
United Fresh Produce Association
Western Growers Association