



By Electronic Mail

September 24, 2020

Dr. Robert R. Redfield, M.D.
Director
U.S. Centers for Disease Control and Prevention
1600 Clifton Road
Atlanta, GA 30329-4027

Dear Director Redfield:

The Consumer Brands Association champions the industry whose products Americans depend on every day. From household and personal care products to food and beverage products, the consumer packaged goods (CPG) industry plays a vital role in powering the U.S. economy, contributing \$2 trillion to U.S. GDP and supporting more than 20 million American jobs.

In addition to helping power the economy, the CPG industry is an integral part of Americans' ability to stay home and stay safe throughout the COVID-19 pandemic. The CPG industry populates key sectors in our nation's critical infrastructure, as recognized by the Department of Homeland Security's Cybersecurity and Infrastructure Security Agency's (DHS-CISA) "[Guidance for Tier 1 Type of Essential Critical Infrastructure Workers](#)." Consumer Brands respectfully requests that the CPG workforce — food, beverage, personal care and household products industry — be prioritized for allocation of COVID-19 vaccines after healthcare workers and first responders. In addition, the CPG workforce manufactures products that are necessary for executing a safe and effective COVID-19 vaccination campaign, particularly with regard to cleaning and sanitizing goods.

The CPG industry has worked diligently to meet demand for products indispensable to pandemic response like food, beverages, disinfectants, cleansers, hand sanitizer, toilet paper and more. These essential items are critically important to the sustainability of our nation's healthcare facilities, and vital to the commercial and community services necessary for critical infrastructure. As demand for these products has skyrocketed, manufacturing facilities remain open, with employees working around-the-clock to ensure availability for essential infrastructure operations and consumers.

Worker absenteeism remains a concern in manufacturing facilities, posing a threat to the maintenance of consistent inventories of life-sustaining products. Despite manufacturers mobilizing physical and administrative interventions to enhance worker health and safety, a COVID-19 vaccination may be the best defense against community transmission. Without early vaccinations, the CPG sector risks the absence of skilled workers due to illness and the subsequent negative impacts on the supply chain. Accordingly, Consumer Brands strongly recommends that the totality of the CPG industry — approximately 1.2 million food, beverage, personal care and household product manufacturing employees — be prioritized as a qualified population for vaccine allocation, following the healthcare workforce and first responders. Pandemic severity has been a determining factor in previous CDC guidance on influenza



pandemic vaccine allocations¹ and the historic infection rate of COVID-19 should justify an elevated priority classification for these critical risk workers.

Consumer Brands provided this recommendation to the National Academies of Sciences, Engineering, and Medicine's Committee on Equitable Allocation of Vaccine for the Novel Coronavirus and the CDC's Advisory Committee on Immunization Practices (ACIP) COVID-19 Working Group, as well.^{2,3} The CPG industry — alongside the frontline food supply workforce — should be categorized as critical risk workers eligible for Tier 2 and Phase 1b vaccine allocation, respectively. Critical risk workers are those in industries essential to the functioning of society and designated for potential substantially high risk of exposure. The products the CPG industry manufacture are undoubtedly essential to the functioning of society and the employees required to make those products must be in company facilities to do so.

In addition to the 1.2 million in CPG manufacturing, Consumer Brands recommends that industry workers in related operations that are critical to the ability of manufacturing facilities to operate and that are not able to work remotely also be included. There are 360,000 employees directly employed by the CPG industry who are involved with trucking and transportation and another 142,000 employees working on facility maintenance.

From the beginning of this COVID-19 crisis, Consumer Brands has advocated for actions that protect workers, such as priority access to personal protective equipment, critical hygiene and cleaning supplies, testing and vaccines. Priority access to a safe, viable COVID-19 vaccine is a critical defense to ensure that essential workers are protected and remain healthy.

Recognizing the challenge that lies ahead, we respectfully request that you recognize and prioritize the CPG industry appropriately as you develop a strategy for allocating and distributing vaccines.

Sincerely,

A handwritten signature in black ink, appearing to read "Betsy Booren", written in a cursive style.

Betsy Booren, Ph.D.
Senior Vice President, Regulatory and Technical Affairs
Consumer Brands Association

cc: Vice President Michael R. Pence
Alex M. Azar II; Secretary, U.S. Department of Health & Human Services
Stephen Hahn, M.D.; Commissioner of Food and Drugs, Food and Drug Administration

¹ https://www.cdc.gov/flu/pandemic-resources/national-strategy/planning-guidance/guidance_508.html

² Comments submitted on September 4, 2020. <https://www.nap.edu/catalog/25914/discussion-draft-of-the-preliminary-framework-for-equitable-allocation-of-covid-19-vaccine>.

³ Comments submitted on September 22, 2020. <https://beta.regulations.gov/document/CDC-2020-0093-0001>.