



By Electronic Mail

September 13, 2021

The President
The White House
1600 Pennsylvania Ave, N.W.
Washington, D.C. 20500

Dear Mr. President,

On behalf of the consumer packaged goods (CPG) industry, we write to share our request that federal agencies move quickly, anticipate challenges, promptly answer questions and partner with the private sector if we are to realize successful implementation of the administration's COVID-19 Action Plan and achieve our shared goal of increased vaccination rates. Accordingly, we respectfully request that you work closely with our organization and the broader business community to create immediate clarity on how the plan can and should be implemented.

The Consumer Brands Association represents companies that make food, beverage, household and personal care products. Our industry's 2.1 million essential employees have worked tirelessly through the pandemic to ensure Americans have access to products they depend on every day. The industry has spent hundreds of millions of dollars to keep its workforce safe and, over the last nine months, undertaken innovative campaigns to educate and encourage vaccination.

The following questions are a small sampling of those that have surfaced in discussions with our membership as critical to helping their companies and others better prepare for implementing the COVID-19 Action Plan and ensuring its success.

Vaccinations

- What is considered documentation for proof of vaccination and how will booster doses be factored into compliance?
- Must an employee be fully vaccinated in order to work?
- How will the requirements address natural immunity? Will individuals that have contracted COVID-19 be required to be vaccinated or submit to testing requirements?
- Will the requirements only apply to vaccines that are fully approved by the Food and Drug Administration?
- Does the government have plans to centralize vaccination tracking or is it the responsibility of businesses to manage?
- What are the consequences of falsifying one's vaccination status and does responsibility rest with the individual or employer?

Testing

- Is there a single testing standard that must be met that would be considered compliant to the negative test result requirement?
- What is considered to be suitable documentation of a negative test result?
- What are the consequences of falsifying test results and does responsibility rest with the individual or employer?

- How long will documentation of test results need to be held?
- If an employee takes a COVID-19 test but the results are not yet available, can the employee continue to work pending the results?
- Will business testing programs that test all employees on-site during the day meet the requirements for unvaccinated workers' need to test before coming to work?
- Should employees choose not to vaccinate, is the company or employee responsible for securing and paying for testing? Will paid time off have to be given for weekly testing requirements?

Operational

- When will the requirements be formally issued and what is the timeline for compliance?
- How does this mandate impact locations with collective bargaining agreements?
- Will this federal requirement preempt existing state-imposed obligations?
- Will the federal requirements supersede state expense reimbursement statutes?
- Do the new federal requirements include exemptions based on religious beliefs and disabilities?
- Will waivers be allowed if essential employees' absences or attrition cause significant disruption to the CPG supply chain?

The Consumer Brands Association and our member companies stand ready to partner with you in getting Americans vaccinated. Strong, consistent collaboration between the private and public sector on implementation will accelerate progress on our shared goal.

Please contact me with any questions and to continue this important dialogue.

Sincerely,

A handwritten signature in blue ink that reads "G. Freeman". The signature is fluid and cursive, with a long horizontal stroke at the end.

Geoff Freeman
President and CEO
Consumer Brands Association