

May 7, 2020

The Honorable Mike Pence
Vice President of the United States
Chair, White House Coronavirus Task Force
The White House
Washington, DC 20500

Dear Vice President Pence:

The COVID-19 outbreak has created an unprecedented challenge for the consumer products value chain, specifically the food and household cleaning supply chain, with urgent public health concerns compounding worker safety considerations, supply chain and other operational challenges.

As a result, CPG companies – as well as state and local authorities – need clear, consistent and detailed direction from the federal government on core questions related to their operations. We are writing to request your assistance in solving this problem by creating an effective interagency process to provide the uniform, national guidance the food and agriculture and CPG manufacturing industries require. Such clarity is vital to addressing significant and evolving COVID-related challenges.

Federal authorities have individually responded quickly to our industry's inquiries by issuing independent guidance often through frequently asked questions or the addition of new or modified webpages. The result is piecemeal guidance, that, while often timely, lacks central coordination creating a daunting level of complexity and making it extremely difficult for companies to develop the comprehensive detailed response plans they need.

As the states move toward reopening, strong coordination among agencies to produce detailed federal guidance can reduce confusion and address manufacturers' critical operational challenges. Additionally, coordinated and detailed federal guidance is more readily adopted by state and local governments reducing the burden for companies with plants in multiple states.

Examples of the types of coordinated federal guidance that is still needed include:

- What threshold of positive employee COVID tests should trigger a plant shutdown?
- When and how should manufacturers administer tests as they ramp up to reopen a plant that has been closed?
- What guidance should manufacturers follow to ensure public health authorities accept privately administered test results?
- How should companies configure common areas (break rooms, locker rooms, wellness clinics, training rooms, cafeterias, office areas etc.) to address coronavirus concerns?
- What protocols should manufacturers follow as inspection and auditing teams reenter plants?
- How should truck drivers interact with those that have returned to work in manufacturing plants, stores and other facilities?

These are but a few examples among a host of issues that are likely to evolve – new direction will inevitably be needed as the crisis continues.

Today, there is no single federal agency providing clear, integrated guidance of this nature. For example, regarding public health and worker safety, the CDC and OSHA exercise authority in their respective jurisdictions, operating in separate “lanes.” This prevents the kind of tight coordination and clarity that our industries and state and local governments need urgently to mitigate risk in an uncertain operating environment.

While an interagency process would initially require collaboration between federal agencies (i.e. CDC and OSHA), the model should be flexible enough to apply to other federal agencies and departments as new challenges arise. Done right, we believe this solution would help produce the clear, federal guidance our industry needs as challenges arise. Our associations are eager to work with you to provide insights that can help ensure guidance is appropriate and applicable to the food and agriculture and CPG manufacturing industries.

Our member companies take their responsibility to Americans during this crisis very seriously. We appreciate your assistance helping to create the business certainty needed to effectively and safely run our vital operations during this challenging time.

Sincerely,

American Bakers Association
American Beverage Association
American Cleaning Institute
American Frozen Food Institute
Consumer Brands Association
Global Cold Chain Alliance
Household and Commercial Products Association
National Fisheries Institute
North American Millers' Association
Peanut and Tree Nut Processors Association
SNAC International
United Fresh Produce Association