

May 22, 2020

Sent Electronically

CDR Chad Dowell
Deputy Associate Director for Emergency Preparedness and Response
Centers for Disease Control and Prevention
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Ms. Sherri A McGarry
Senior Health Scientist, CDC Liaison Food Safety
Centers for Disease Control and Prevention
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Dear CDR Dowell and Ms. McGarry:

As the collective organizations representing the food, agriculture and consumer packaged goods (CPG) supply chain, we appreciate that the Centers for Disease Control and Prevention is a trusted public health authority that our industries — as well as state and local authorities — continue to rely on for clear, consistent and detailed direction as related to their essential, critical infrastructure operations during the COVID-19 pandemic. This leadership is vital to addressing significant and evolving COVID-related public health emergency challenges.

The COVID-19 pandemic has created an unprecedented challenge for the consumer products value chain, specifically the food, agriculture and overall CPG supply chain, with urgent public health concerns compounding worker safety considerations, supply chain and other operational challenges. As such, we are writing to request your assistance in the following:

- Provide a comprehensive list of testing resources and guidances available for the critical infrastructure workforce.
- Develop a tool that allows stakeholders to identify local testing providers.
- Develop additional guidances, in coordination with other relevant federal agencies, that address the following:
 1. What is the standard definition for what constitutes a COVID-19 outbreak?
 2. If a location appears to be associated with an outbreak of COVID-19, who is responsible for performing the contact tracing – the facility/company, the public health department, both? If the facility does the contact tracing does the public health department want the results? Is there a standard protocol for providing such information to the public health department?
 3. For facilities that implement CDC/OSHA and other federal guidance (e.g. regarding facial coverings, appropriate physical distancing, physical barriers and partitions, regulatory cleaning) what is the recommendation for contact tracing and home isolation for exposed workers?
 4. What factors should companies consider when they are determining if operations should continue?
 5. How can public health officials and critical infrastructure manufacturers balance public health safety while remaining operational?
 6. When and how should critical infrastructure companies administer tests as they ramp up to reopen a location that has been closed?

7. Should affected companies ever consider widescale employee testing as a risk mitigation/management strategy? When? What test? How can this be organized?
8. If a single production, distribution or retail location has multiple COVID-19 confirmed/symptomatic employees and wants to test all employees to determine those with an active infection that are asymptomatic and infecting others – how can the facility organize such widescale employee testing? Who should the firm contact? Can the local public health department assist in such situations?
9. Is there a standard protocol(s) and types of testing that industry can utilize so that public health officials “trust” the findings? Currently, we have members being told their test findings are not valid and only tests issued by public health departments are valid findings.
10. When a manufacturing facility/employer assumes the cost and tests its employees, how can it assure it gets the results as quickly as possible? We have heard from members that the public health department, at times, is slow to provide such results at all or in a timely manner. Is there anything that can be done to remedy and avoid that situation?
11. What guidance should companies follow to ensure public health authorities accept privately administered test results?
12. What protocols should growers and manufacturers follow as inspection and auditing activities resume?
13. How should truck drivers interact with those that have returned to work in manufacturing plants, distribution centers, stores and other facilities?

We believe these resources would help produce the clear, federal direction our industry needs as challenges evolve. Our member companies take their responsibility to Americans very seriously. Our associations are eager to work with you and partner as a resource to provide insights that can help ensure resources are appropriate and applicable to our industries.

Thank you for your ongoing response to our industry’s inquiries. We appreciate your leadership and assistance in helping to create the business certainty needed to effectively and safely run our vital operations during this challenging time.

Sincerely,

American Bakers Association
American Cleaning Institute
American Frozen Food Institute
Consumer Brands Association
FMI - The Food Industry Association
Global Cold Chain Alliance
International Dairy Foods Association
International Food Distributors Association
National Association of Convenience Stores
National Fisheries Institute
National Automatic Merchandising Association
National Restaurant Association
North American Millers Association
Peanut & Tree Nut Processors Association
United Fresh Produce Association