December 21, 2020

Advisory Committee on Immunization Practices
Docket No. CDC-2020-0124,
Attn: December 18 and 20, 2020 ACIP Meeting
Centers for Disease Control and Prevention
1600 Clifton Road NE
MS H24-8
Atlanta, GA 30329-4027

Dear Members of the Advisory Committee on Immunization Practices:

On behalf of the International Foodservice Distributors Association and our member companies, thank you for the opportunity to provide comments to the Committee. We are asking that the Advisory Council on Immunization Practices include the employees of the foodservice distribution industry as frontline essential workers in phase 1b in the next set of federally recommended guidelines. In particular we are requesting that the Committee clarify that the Food and Agriculture category listed in phase 1b also includes Transportation and Logistics workers in the Food and Agriculture sector including foodservice distribution.

There are two separate supply chains distributing food products in the United States. IFDA represents foodservice distributors who provide the warehousing, transportation and logistics support to ensure that fresh, safe food fills the kitchens of our nation’s hospitals, nursing homes, schools, U.S. military, restaurants and other food away from home operations. Many of the facilities serviced by distributors are included in phase 1a of the vaccine distribution.

Foodservice distribution is a $303 billion industry and employs more than 350,000 people. There are 15,000 foodservice distribution center locations in the United States, which deliver 8.7 billion cases of food and other products annually. All of these businesses have continued to operate throughout the pandemic to ensure their customers have the food products they need. As food demand has grown, the industry has also worked closely with food banks and other non-profits to provide food aid for hungry Americans.

Foodservice distribution has been defined by the Cybersecurity & Infrastructure Security Agency (CISA) of the US Department of Homeland Security as an essential business during COVID-19 that is critical to the country’s infrastructure. The Centers for Disease Control and Prevention have adopted CISA’s definition for purposes of defining essential workers in the context of CDC’s COVID-19 Vaccination Program Interim Playbook for Jurisdiction Operations.

Distributors are frontline essential workers. They cannot work remotely and are on the ground in warehouses and delivering food and supplies in trucks. Even with the pandemic, a nationwide shortage of commercial truck drivers has meant that companies are still having difficulty finding and training the drivers they need to service their customers. A driver coming down with COVID can create significant strain for a distributor’s operation, often forcing them to delay or cancel deliveries. A nursing home facility, for example, must have the products that distributors deliver to feed their residents each day.
Clarifying that the employees of the foodservice distribution industry are included in phase 1b of the vaccine distribution guidelines will help ensure that they do.

Ensuring the continuing supply of food to American consumers and foodservice customers is a critical government responsibility. Clarifying that food industry transportation and logistics workers including foodservice distributors are considered frontline essential employees will send a strong signal that state vaccination plans must include the industry in their priority planning. It is critical that the men and women who work in the warehouses and drive the trucks to deliver these products can safely continue to fulfill their vital mission.

The 350,000 hard-working Americans of the foodservice distribution industry have continued to come to work every day throughout the COVID-19 crisis to service their customers. They deserve to have their health protected. The Committee should clarify that foodservice distribution industry workers are included in phase 1b of the vaccination recommendation guidelines.

Sincerely,

Jonathan Eisen
Senior Vice President, Government Relations