
December 3, 2020

Advisory Committee on Immunization Practices Meeting
Centers for Disease Control and Prevention
1600 Clifton Road NE
MS H24-8
Atlanta, GA 30329-4027

Re: Notice of meeting and request for comment; Docket No. CDC-2020-0121

To Whom it May Concern:

The North American Meat Institute (NAMI or the Meat Institute) submits these comments regarding the above-referenced docket, CDC-2020-0121.¹ As critical infrastructure workers, workers in the meat and poultry industry, including United States Department of Agriculture inspectors, should be given a very high priority, behind only health care workers and those in long term care facilities, for receiving the COVID-19 vaccine.

Developing an effective vaccine has been priority one and the Food and Drug Administration is now on the precipice of approving one or more vaccines. Developing an effective plan for vaccine distribution and prioritization is now the next important task and a key consideration in developing such a plan is feasibility and efficiency of administration.

The Advisory Committee on Immunization Practices (ACIP) got it right recommending health care personnel and residents of long-term care facilities for Phase 1a of the COVID-19 vaccination program. When evaluating the sub prioritization for essential employees as part of Phase 1b of the COVID-19 vaccination program, meat and poultry employees, and USDA inspectors are a logical choice to lead this phase based on the science, ethics, and implementation considerations outlined by the ACIP.

Recognizing the importance of keeping the food supply chain functioning, in March the Department of Homeland Security identified food manufacturing as a critical infrastructure sector, which included meat and poultry workers.² The Centers for Disease Control and Prevention and the Occupational Safety and Health Administration developed guidance for the meatpacking industry that included comprehensive protocols for

¹ The Meat Institute is the nation's oldest and largest trade association representing packers and processors of beef, pork, lamb, veal, turkey, and processed meat products and NAMI member companies account for more than 95 percent of United States output of these products. The Meat Institute provides regulatory, scientific, legislative, public relations, and educational services to the meat and poultry packing and processing industry.

² Cybersecurity & Infrastructure Security Agency. <https://www.cisa.gov/identifying-critical-infrastructure-during-covid-19>.

companies to follow, including daily health screening of employees before they enter facilities.

Those protocols have been in place for months, putting meatpacking facilities in an ideal position to administer the vaccine to large numbers of workers in an orderly and efficient fashion. Many meatpacking facilities have medical personnel on site to facilitate vaccination and already have programs in place to administer other vaccines to their employees. Meatpacking companies also have education programs underway to ensure workers receive information about the importance and safety of vaccination. The infrastructure already in place for these programs can be easily and quickly adapted to deliver safe, effective vaccines for COVID-19 in the meat and poultry industry.

Like other critical infrastructure sectors, the meat and poultry industry was among the earliest to face the unprecedented challenges of the COVID-19 pandemic. Since March, as scientific understanding knowledge of COVID-19 transmission and prevention improved, meat packing facilities have successfully implemented guidance for programs and controls to reduce cases and protect employee safety, despite worsening surges across the United States. Cases amongst meatpacking facility employees have decreased significantly, but vaccination remains a critical tool for effectively protecting meatpacking employees, while keeping America's farms working and grocery stores stocked.

When evaluating the science to determine the sub prioritization of the essential workforce for Phase 1b of vaccine allocation meat and poultry workers are ideal candidates given the CDC's discussions regarding how those workers have been affected by the pandemic. Regarding the ethical principles associated with COVID-19 vaccine prioritization, meat and poultry employees are ideal candidates for high sub prioritization within Phase 1b because many meat and poultry establishments are in rural communities that can experience challenges with access to adequate health care. Placing meat and poultry plants at the top of the list for Phase 1b allocation can help maximize the health of the entire rural community because the establishment is often the town or county's largest employer. Prioritizing meat and poultry workers also can help mitigate health inequalities given much of the workforce is comprised of minorities, immigrants, or those with lower socioeconomic status.

Finally, when evaluating the implementation considerations, meat and poultry industry employees remain a strong candidate for high sub prioritization in Phase 1b vaccine allocation. Again, many larger meat and poultry establishments have medical personnel on staff or contract to screen employees for symptoms, administer tests, and manage existing employee health programs, such as annual Flu vaccine programs. Administering the COVID-19 vaccine can easily fit into the existing health program infrastructure of many in the meat and poultry establishments. This approach also is consistent with the views of The Committee on Equitable Allocation of Vaccine for the Novel Coronavirus, part of the National Academies of Sciences, Engineering, and Medicine, which concluded that people in the population group that includes meat and poultry

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workers “need to be provided the vaccine, and special efforts must be made to reach these workers in ways that encourage them to be vaccinated.”³

Meat industry workers are part of the essential workforce and prioritizing them will provide an efficient means of administering the vaccine to a significant number of people who have been identified by CDC as a population that was greatly affected by COVID-19. And it will promote the general health and well-being in many rural communities that are often underserved.

Meatpacking workers are part of our nation’s critical infrastructure. The meatpacking sector has systems in place for efficient, rapid vaccination. For these reasons, meatpacking workers and USDA inspectors should be given high priority in Phase 1b to receive COVID-19 vaccinations.

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For the reasons discussed above, meat and poultry workers and USDA inspectors should be given the high priority for vaccinations.

Respectfully submitted,



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³ *Discussion Draft of the Preliminary Framework for Equitable Allocation of COVID-19 Vaccine*, p. 67.