



December 3, 2020

VIA ELECTRONIC DELIVERY & SUBMISSION

Centers for Disease Control and Prevention
Advisory Committee on Immunization Practices
c/o ATTN: November 21, 2020 ACIP Meeting
1600 Clifton Road N.E., MS H24-8
Atlanta, GA 30329-4027

RE: Docket No. CDC-2020-0121

Dear Members of the Committee,

On behalf of the American Cleaning Institute (ACI), I am writing to urge the prioritization of, and to make available, vaccine supplies for workers at cleaning product manufacturing facilities in the United States.

ACI member companies have increased production and are operating around the clock to produce these vital products to protect individuals from the spread of COVID-19 and to meet the dramatic expansion in demand. The ACI goal remains getting finished cleaning, sanitizing or disinfecting product critical to combating Novel Coronavirus to market and increasing the supply of ingredients to accomplish this goal.

Our members have embraced guidance from the Centers for Disease Control and Prevention and multiple governmental authorities to undertake social distancing, enable telework and practice good hygiene. Many ACI member companies have instituted various policies to reduce the number of employees traveling to work and interacting with co-workers. However, the operation of cleaning product manufacturing plants cannot be done remotely and requires the consistent presence of highly trained personnel. This also includes ensuring access to critical supplies and transportation systems so the cleaning product industry can continue to produce and deliver essential products.

Because the business of cleaning product chemistry is so fundamental to our nation's economy and to the continued operation of multiple other sectors, the U.S. Department of Homeland Security has classified the Chemical Sector (of which the cleaning product industry is a key component) as a Critical Infrastructure Sector.

Manufacturing employees who are making cleaning products, hand sanitizers and disinfectants should be in the first priority group for essential workers. The CDC Advisory Committee on Immunization Practices (ACIP), approved the first priority of allocation of COVID-19 vaccines to health care workers. The committee is underway finalizing the recommendations for who follows after healthcare workers. Once the recommendations are set, the states will use the guidance and set their own prioritization standards. There will likely need to be more granular prioritization within these categories and within the essential worker category, ACI urges the ACIP and CDC to prioritize the cleaning product supply chain accordingly.

All segments of society have a role to play to help limit the spread of Novel Coronavirus and protect public health, especially those who are most vulnerable. The cleaning products industry can make a valuable contribution by applying prudent measures to prevent the spread of infection at our sites, while also maintaining production.

As the nation's leading association representing the cleaning products value chain, ACI and its members are dedicated to ensuring that consumers and customers have access to critical cleaning products. ACI serves the growth and innovation of the U.S. cleaning products industry by advancing the health and quality of life of people and protecting our planet. ACI achieves this through a continuous commitment to sound science and being a credible voice for the \$60 billion cleaning products industry.

We appreciate your consideration and commitment to address these issues during this challenging time. ACI and its members are committed to working with you to address this critical issue. Please contact me or Douglas Troutman of the ACI team at dtroutman@cleaninginstitute.org if we can be of further assistance.

Sincerely,



Melissa Hockstad
President & Chief Executive Officer