March 24, 2020

As the country mobilizes to meet the challenges of the COVID-19 crisis, the Controlled Environment Building Association (CEBA), a core partner of the Global Cold Chain Alliance (GCCA) requests your assistance clarifying that design-build firms working on food facilities, cold storage warehouses and distribution centers storing, handling and transporting food (for human and animal consumption) be deemed part of the critical infrastructure and exempt from the gathering and curfew bans that are starting to take effect.

Our members are design-build contractors who are integral to building the infrastructure required for processing, manufacturing, storing and distributing food products from factories and ports to grocery shelves. 95% of the food produced and manufactured in or imported into the United States goes through third-party warehouses and distribution centers before it reaches American consumers.

The Food Supply Chain

- Presidential Policy Directive 21 (PPD-21) designates the food and agriculture sector as a critical infrastructure sector whose assets, systems, and networks are considered so vital that their incapacitation or destruction would have a debilitating effect on security, national economic security, national public health, or safety.
- The President’s Coronavirus Guidance published on March 16, 2020 instructs employees of Critical Infrastructure Industries, such as the food and agriculture sector, to maintain normal work patterns during the global coronavirus outbreak.
- Construction of food facilities is covered by PPD-21 and the President’s Guidance: see Public Works:
  - Workers who support the operation, inspection, and maintenance of essential public works facilities and operations, including bridges, water and sewer main breaks, fleet maintenance personnel, construction of critical or strategic infrastructure, traffic signal maintenance, emergency location services for buried utilities, maintenance of digital systems infrastructure supporting public works operations, and other emergent issues

We Ask the Following:

- **Essential Designation:** To continue providing a safe and reliable food supply, we are asking for clear, unambiguous classification as “essential businesses and services” to allow our employees to leave their residences and come to work as needed to perform job functions and keep the food supply stable for the American
people, even if facilities are located in quarantined or lockdown areas. Workers involved in construction and those who support construction activities must have access to food facilities and construction sites, even if that requires them to pass through, or into quarantined areas. This also includes the transportation providers moving materials into and out of our facilities.

- **Testing:** Supporting a robust public health response, including priority access to coronavirus test kits for food warehouse facilities to ensure a healthy workforce, is available to support the food supply chain.
- **Supplies:** Granting priority access to cleaning and sanitation supplies and other tools should we experience an outbreak and need to quickly restore operations.
- **Infrastructure:** Keeping ports and transportation networks open to retain Americans’ access to international products – priority access in ports for critical infrastructure related products.

We all know that maintaining sufficient food supplies in our communities is vital. Grocery stores and other retail food facilities must be able to depend on a steady and dependable flow of food to fill their empty shelves. Yet, this can only happen if the food supply chain is functioning smoothly without unnecessary impediments. That is why CEBA and GCCA urge you to implement the above policy initiatives.

CEBA and GCCA stand ready to work with federal and state officials to make sure the food supply chain can meet the demands of this unprecedented crisis.

Sincerely,

Megan Costello  
Interim President & CEO GCCA

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**Who We Are:**

GCCA: Our network of nearly 800 cold storage warehouses and transportation hubs across the country serve as the backbone of the food supply chain – in other words, we are largely responsible for our food’s journey from the points of production and processing to consumers’ hands. Our members employ 62,000 people in the US and serve 6,000 food manufacturers and retail customers. 3PL cold storage facilities bring milk, eggs, chicken, fish, pork, beef, fruits, vegetables, and more to grocery stores, restaurants, and critically important bodies like hospitals, military bases, and government programs including the National School Lunch program and USDA Nutrition Assistance Programs such as SNAP and WIC.