



December 21, 2020

Submitted electronically via: www.regulations.gov

Advisory Committee on Immunization Practices
U.S. Centers for Disease Control and Prevention
1600 Clifton Road Atlanta, GA 30329-4027

Re: Docket number CDC-2020-0124

Dear Advisory Committee Members:

The Solid Waste Association of North America (SWANA) appreciates the opportunity to comment in support of the Centers for Disease Control and Prevention's Advisory Committee on Immunization Practices (ACIP) recommendation to include Essential Critical Infrastructure Workers as Phase 1(b) COVID-19 vaccine recipients. SWANA has been the leading association in the solid waste management field for over 50 years and represents public and private sector solid waste professionals across the entire United States.

SWANA urges the ACIP make explicit that sanitation and recycling workers are included in Phase 1(b) and be given priority in distribution plans to protect public health and the environment and ensure the uninterrupted continuation of other critical infrastructure work. Like other front-line essential workers, they play a critical role in keeping our Nation functioning.

The men and women who collect, process, dispose and recycle residential and commercial waste and recycling have been under intense pressure throughout the pandemic. They are unable to work from home, and many also live and work in high-risk, high-transmission communities. A disproportionate number are also people of color and their communities are especially hard hit by the pandemic. As a result of these factors, thousands of solid waste and recycling workers have contracted COVID-19. In some communities, this has caused interruptions in the safe collection of solid waste and recycling which is so important to protect the environment and human health.

Workers who support the effective removal, storage, and disposal of residential, industrial, and commercial solid waste and hazardous waste, including at landfills, are specifically cited as essential critical infrastructure workers within public works and infrastructure support services of the Cybersecurity and Infrastructure Security Agency's *Essential Critical Infrastructure Workers Guidance Version 4.0*. Crucially, the management and disposal of waste is cited seven additional times within other portions of the guidance. The management of waste and recycling is not only important to our Nation's function in and of itself, but also undergirds all other essential activities.

For these reasons, SWANA urges that the CDC's guidance to state health departments and others make clear that front-line solid waste and recycling industry workers are included in the Phase 1(b) vaccine distribution plans. The risks that sanitation and recycling workers face within the scope of their duties combined with the vital role that their work has on all other sectors of the economy, justifies priority access to the vaccine as being in the best interest of the Nation.

SWANA appreciates the opportunity to submit these comments to the Advisory Committee on Immunization Practices and thanks the members for their invaluable work during these difficult times. We look forward to further information and discussions on the phased allocation of COVID-19 vaccination distribution as we, together, continue to fight this pandemic. If you have any questions, please contact Jesse Maxwell, Advocacy and Safety Senior Manager, at jmaxwell@swana.org.

Sincerely,



David Biderman
Executive Director & CEO

cc: CDC Director Dr. Robert Redfield
Speaker of the House Nancy Pelosi
Senate Majority Leader Mitch McConnell
Senate Minority Leader Charles Schumer
Governor Larry Hogan
House Minority Leader Kevin McCarthy
White House Chief of Staff Designate Ron Klain