December 22, 2020

The U.S. Centers for Disease Control and Prevention Advisory Committee on Immunization Practices (ACIP) held a virtual meeting on December 19 & 20 to consider the allocation of initial supplies of the COVID-19 vaccine for Phase 1(b) and 1(c) distribution. ACIP also solicited public comment and the Solid Waste Association of North America (SWANA) submitted the attached document urging that sanitation and recycling workers are included in Phase 1(b) and be given priority in distribution plans. 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.

We understand that distribution priority will ultimately be set at the state and territorial level, therefore we wish to share our comments with you as a leading public health official.

Including sanitation and recycling workers in Phase 1(b) vaccine distribution plans will protect public health and the environment and ensure the uninterrupted continuation of other critical infrastructure work. Like other front-line essential workers, sanitation and recycling workers play a critical role in keeping our Nation functioning.

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.

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.

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 don’t hesitate to contact me at jmaxwell@swana.org.

Sincerely,

Jesse Maxwell
Advocacy & Safety
Senior Manager