

March 18, 2020

Bob Kolasky, CISA Assistant Director for the National Risk Management Center
Via Jennifer Pedersen
jennifer.pedersen@cisa.dhs.gov
Department of Homeland Security
Washington, DC 20250-3601

Re: Tier 1 Essential Critical Infrastructure Workers

Dear Mr. Kolasky:

The National Pork Producers Council (NPPC) submits these comments regarding the United States Department of Homeland Security's request for guidance on identifying those workers who provide essential services to Critical Infrastructure and should be included on the list of Tier 1 Essential Critical Infrastructure Workers.

NPPC is an association of 42 state pork producer organizations that serves as the global voice for the nation's pork producers. The U.S. pork industry represents a significant value-added activity in the agriculture economy and the overall U.S. economy. Nationwide, more than 60,000 pork producers marketed more than 120 million hogs in 2017, and those animals provided total gross receipts of more than \$20 billion. Overall, an estimated \$23 billion of personal income and \$39 billion of gross national product are supported by the U.S. pork industry. Economists Daniel Otto, Lee Schulz and Mark Imerman at Iowa State University estimate that the U.S. pork industry is directly responsible for the creation of nearly 37,000 full-time equivalent pork-producing jobs and generates about 128,000 jobs in the rest of agriculture. It is responsible for approximately 102,000 jobs in the manufacturing sector, mostly in the packing industry, and 65,000 jobs in professional services such as veterinarians, real estate agents and bankers. All told, the U.S. pork industry helps support more than 550,000 mostly rural jobs in the United States.

Considering the current COVID-19 outbreak in the United States and the growing uncertainty about the overall health of our nation, it is imperative that there is minimal disruption in the production, and movement of vital resources such as the agricultural commodities, including pork, that feeds the nation.

U.S. consumers rely on the farmers *who raise the livestock with which they feed their families* safe, nutritious, and affordable food. Food manufacturers rely on receiving source materials to make a variety of perishable and non-perishable foods. It is critical that all food commodities continue to be produced and move throughout the supply chain, even when the nation is faced with human illnesses, travel restrictions, and other outbreak-related circumstances.

Though the scope of the ongoing outbreak is unknown, the pork industry wants to ensure we can safely and efficiently continue to produce pork to feed Americans. The industry already suffers from chronic labor challenges. We will likely face additional shortages of workers, both on farm and in the processing plants, due to COVID-19. Those workers must be included as Tier 1 Essential Critical Infrastructure Workers to help aid the entire food sector in maximizing efficiencies and maintaining continuity of business which is imperative as we provide a necessary food source.

Indeed, the US Pork Industry has long and extensive experience and knowhow in maintaining bio security and managing the risks that are presented by a variety of diseases. Indeed, there are few if any sectors of the economy that already actively engage in the level of biosecurity that is found on the typical hog farm. As an industry, we are well equipped with the knowledge and know how to effectively operate in difficult circumstances, provided our workers and supplies can travel.

To this end DHS must add the following in their list of Tier 1 Essential Critical Infrastructure Workers

Medical/Health

- Large animal veterinarians and veterinary staff, including swine veterinarians

Food

- Farmers and Farmworkers including both fieldworkers and animal caregivers
- Feed mill operators
- Livestock nutritionists
- Feed and veterinary professionals
- Slaughterhouse and Packing Plant employees
- Meat processing employees

Transportation and Logistics

- Workers that transport and distribute food, feed, livestock, veterinary pharmaceuticals and other necessary veterinary medical materials including essential supplies for production, maintenance and sanitation on farms

Other Government Operations:

- USDA-FSIS Plant Inspectors

Thank you for the opportunity to submit these comments. If you have any questions about these comments, or need additional information, please don't hesitate to contact me at 202-680-3820 or by email at formicam@nppc.org.

Sincerely,



Michael C. Formica
Assistant Vice President & Legal Counsel, Domestic Policy
National Pork Producers Council