

MEMORANDUM

TO: Plastics Industry Association

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Food, Drug, and Cosmetic Packaging
Materials Committee

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RE: **Food Packaging Supply Chain as Essential Critical Infrastructure Workers**

The purpose of this memorandum is to provide the bases for our conclusion that workers along the food, drug, and medical device packaging supply chain are considered essential critical infrastructure workers that should be exempted from any quarantine orders or reduction of workforce initiatives that are adopted in an effort to contain the Coronavirus Disease 2019 (COVID-19) outbreak in the United States. In the memorandum published by the Department of Homeland Security's Cybersecurity and Infrastructure Security Agency (CISA) on March 19, 2020, workers engaged in the production of food packaging as well as workers engaged in the production of packaging that prevents the contamination of food, water, medicine, and other essential products are identified as essential critical infrastructure workers. It is our opinion that workers along the entire supply chain of these packaging products, rather than just those manufacturing the finished packaging products, are included in this designation.

Specifically, all workers engaged in the manufacture of food, drug, and medical device packaging and packaging components are critical to ensure that Americans have continued access to food and vital health and medical products such as pharmaceutical drugs, masks, and medical equipment (like respirators or ventilators). The products that these workers are manufacturing are necessary components of food and drug packaging or the finished food and drug packaging itself. Necessary components of the finished packaging include but are not limited to polymers, additives, adhesives, inks, and colorants. Likewise, companies that produce equipment and devices used to process and package food and drugs are important to the continued supply of these products to the market. In many cases, these components are manufactured specifically for use in the manufacture of food, drug, and medical device

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packaging and processing equipment and are subject to rigorous safety-based regulations that require these packaging components to be made from materials that have been reviewed by the U.S. Food and Drug Administration (FDA) and demonstrated to be safe for their intended use. The supply chain for the finished food, drug, and medical device packaging and processing equipment is therefore not fungible because other similar products have not been evaluated to determine whether they meet these regulatory requirements. The supply chain for finished food, drug, and medical device packaging and processing equipment must continue to operate without substitution to ensure that Americans have continued access to their items of most critical need during this COVID-19 outbreak; thus, we conclude that all employees along this supply chain are essential critical infrastructure workers.

At this time, there is a significant increase in demand for food, drugs, and medical devices and their packaging to meet the need and dwindling supply of vital food, pharmaceutical, and medical supplies. In addition to employees along the food, drug, and medical device packaging supply chain being essential and exempt from quarantine orders, it is also our opinion that these workers be exempt from reduction in workforce initiatives to ensure the safety of workers in these critical facilities. This will ensure that Americans do not experience any further disruption in their supply of food, pharmaceutical, and medical supplies and that workers at manufacturing facilities remain safe. Of course, all Centers for Disease Control and Prevention (CDC) recommendations should be followed to guarantee that the food, drug, and medical device packaging workforce is protected.