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January 4, 2021

The Honorable Phil Murphy
P.O. Box 001
Trenton, NJ 08625

Dear Governor Murphy,

Our association, representing the motor fuel retailing, convenience store, and automotive repair industries in New Jersey, appreciates your efforts to devise and implement a distribution framework by which a COVID-19 vaccine is distributed in a fair and impactful manner. Our industry is not alone in looking forward to the day when Americans can access a vaccine and eventually return to life as it was before COVID-19.

The Centers for Disease Control and Prevention (CDC) has issued guidance, informed by the Advisory Committee on Immunization Practices' (ACIP's) recommendations, to assist state and local public health programs as they plan vaccination responses to the pandemic.¹ Consistent with the CDC's recommendations, we believe that an effective scheme for vaccine distribution requires appropriately prioritizing employees of frontline essential businesses, including those in the convenience and fueling industry. The guidance advises that frontline essential workers of businesses that are part of the critical infrastructure workforce should receive a vaccine as part of Phase 1-B of a jurisdiction's distribution scheme. Phase 1-B would follow behind those healthcare personnel and long-term care facility residents who are grouped into Phase 1-A.

The frontline essential workers in our industry should receive the vaccine as part of the priority Phase 1-B. Employees in our industry serve on the front lines of the fuel and food distribution systems across the country. This includes consumer-facing retail sales of food and motor fuels as well as distribution of many of these critical products. We think this is an appropriate classification for our industry's employees given their necessity to the day-to-day lives of Americans in all walks of life – including first responders. Without our industry getting motor fuels to market, for example, front-line workers throughout all industries would be unable to get to work – halting the economy and preventing first responders who would be unable to get to those in need. When vaccine distribution begins, trucks delivering the vaccine will depend on our retailers to be open to refuel. The food and convenience items our industry provides are also critical as our industry often has the most convenient locations and allows for quick shopping trips for American consumers. This is also helpful for first responders, especially because stores in our industry are typically the only ones open extended hours (or 24 hours per day) to serve their needs.

¹ See Dooling K, Marin M, Wallace M, et al. The Advisory Committee on Immunization Practices' Updated Interim Recommendation for Allocation of COVID-19 Vaccine — United States, December 2020, *available at* <http://dx.doi.org/10.15585/mmwr.mm695152e2>.

The CDC’s guidance designates frontline essential workers as “workers who are in sectors essential to the functioning of society and are at substantially higher risk of exposure” to COVID-19. This designation includes first responders and workers that are in the education, food and agriculture, manufacturing, correction facility, U.S. Postal service; public transit; and grocery industries.

The Department of Homeland Security’s Cybersecurity and Infrastructure Security Agency recognized early on the importance of our industry to ensure Americans had food in markets, fuel at gas stations, and safe places for truck drivers to stop as they haul essential items across the country. In the deployment of a vaccine to protect Americans from COVID-19, that recognition should be applied to the convenience industry.

Our employees have put themselves at risk since the beginning of the pandemic, working despite health concerns, and we believe they should be prioritized in vaccine deployment. We appreciate your consideration of our comments and sincerely thank you for the hard work you have done to protect the health of our state.



Sincerely,

Sal Risalvato
Executive Director
NJ Gasoline, Convenience Store, Automotive Association

Cc: The Honorable Judith Persichilli