

December 9, 2021

The Honorable Alejandro Mayorkas
U.S. Department of Homeland Security
2703 Martin Luther King Jr Ave SE
Washington, DC 20593

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave SE, West Building
Ground Floor (W12-140)
Washington, D.C. 20590-0001

Re: Cross-border critical infrastructure – vaccination policy alignment

Dear Secretaries Mayorkas and Buttigieg:

The undersigned organizations rely on uninterrupted trade between the U.S. and Canada to provide both Americans and Canadians access to the goods they need, including food. Throughout the pandemic, despite the multitude of unprecedented challenges, our critical infrastructure sectors have worked diligently to ensure that both Americans and Canadians have access to the goods they depend on every day. We write to you today deeply concerned regarding the pending implementation of the [upcoming U.S. policy](#) requiring all essential foreign national truck drivers to provide proof of vaccination upon crossing into the U.S.

North American agricultural supply chains are deeply intertwined. Including Canadian truck drivers in the cross-border vaccine mandate will impede trade flows and harm both the U.S. and Canada. Canada is the largest import market for finished U.S. agricultural products and Canada is a major fertilizer supplier for U.S. farmers. If Canadian truck drivers are not excluded from the mandate, this essential trade will be reduced and become more costly. In recognition of the essential role of truck drivers, Canada has not implemented a similar ban on unvaccinated American truck drivers. We strongly urge the United States to continue recognizing the essential role of truck drivers as well, both for domestic commerce and cross-border commerce.

As organizations representing industries and supply chains that have been deemed part of critical infrastructure since the beginning of the pandemic, we are appealing to you to modify this new mandatory COVID-19 vaccination policy to include options for vaccine exemptions and testing as an alternative to vaccination for cross-border truck drivers. It is our hope that this policy reflects the Occupational Safety and Health Administration (OSHA) Emergency Temporary Standard (ETS) [recent fact sheet](#) assertion that those who work alone and do not come into contact with other employees or customers pose little risk to others and should be exempt from vaccine requirements.

For the totality of the pandemic both U.S. and Canadian governments have acknowledged and addressed the special circumstances around critical infrastructure supply chains. Measures were taken to secure the timely flow of goods and other essential products between our nations, which included keeping the border open to essential travelers, such as truck drivers. Throughout the

duration of the pandemic, these essential travelers conducted themselves professionally while delivering the products consumers rely upon every day. This new U.S. requirement of proof of vaccination for essential travelers, including truckers, comes at a time when trucker shortages are acute. To support U.S. supply chains, the special circumstances of essential critical infrastructure travel should continue to be recognized.

According to the Canadian Trucking Alliance (CTA), there are about 120,000 Canadian truckers with cross-border routes. It is our understanding that Canadian drivers have achieved a high rate of vaccination. However, given the already serious shortage of drivers in both Canada and the U.S., any reduction in the availability of drivers associated with new COVID-19 measures would be crippling to trade and food supply chains.

Further, the vaccination rate among American truck drivers is significantly less than that of Canadian drivers. If the government of Canada were to reciprocate this regulation and impose new vaccination requirements similar to the U.S. measures coming into effect in January, a very large percentage of the estimated 40,000 U.S.-based drivers who have cross-border routes would not be able to enter Canada, exacerbating current supply chain challenges.

In light of this very real threat to the orderly trans-border flow of goods, we urge you to provide cross-border truck drivers with various exemption and testing options, such as those reportedly being provided under the OSHA ETS. We look forward to partnering with you to ensure the timely and efficient movement of goods, including food, across borders.

Sincerely,

Agricultural Retailers Association
American Bakers Association
American Farm Bureau Federation
American Feed Industry Association
American Sweet Potato Marketing Institute
Consumer Brands Association
Corn Refiners Association
Fresh Produce Association of the Americas
National Council of Farmer Cooperatives
National Grain and Feed Association
National Pasta Association
National Propane Gas Association
North American Millers' Association
Pet Food Institute
The Fertilizer Institute
The International Dairy Foods Association
USA Rice
Western Growers