



4201 Wilson Blvd. • Suite 700 • Arlington, VA 22203

T 202.457.0825 • F 202.463.0474 • www.aradc.org

September 17, 2021

The Honorable Joseph R. Biden
President of the United States
1600 Pennsylvania Ave. NW
Washington, DC 20500

RE: Potential vaccine mandate and employer enforcement requirement

Dear President Biden,

I write to you on behalf of the businesses throughout rural America that serve and support America's farmers. Our member companies provide essential products and services to America's farmers and are critical infrastructure components of our nation's food supply chain. While we share your goal of putting COVID-19 behind us as soon as possible, we oppose the idea of compelling employers to enforce vaccine mandates. This opposition is not because we question the vaccines or the need to receive them – rather, our opposition comes from the likely impacts the sweeping mandate will have on an already-tight employment situation for agricultural employers. We submit that there are better ways to achieve the goal of higher vaccination rates.

Our member companies and the farmers they serve depend on innovation to continually improve production practices, and this innovation is rooted deeply in science. Depending on science validated by capable regulatory authorities in whom we have confidence is standard operating procedure for our industry. We depend on it for regulating the products and practices we use to produce the nation's food supply. With proper encouragement and incentives, this fundamental belief in science can contribute toward increasing vaccinations, and this is true throughout the agricultural industry. As evidence, a number of agricultural organization CEOs penned an open letter to our memberships which explicitly encouraged our members to get vaccinated¹.

Agricultural retailers serve farmers, and as such they are located in rural communities around the country. Right or wrong, residents in those rural communities are more likely to have lower vaccination rates. If our members are forced to apply a vaccine mandate to all of their people in these rural locations, not only will it be impossible to enforce but it will also give rise to employee turnover that will destroy the abilities of these companies to conduct business.

Some of our members are small family companies or cooperatives with fewer than 100 employees, and other members are much larger than the 100-employee threshold. These companies compete in the same trade areas. The 100-employee threshold would have one company's outlet subject to the vaccine mandate, and another company's outlet in the same

¹ https://www.agri-pulse.com/ext/resources/Newsletter-photos/2021/9-1-21/Rural_Vaccination_Letter.pdf

trade area – with similar numbers of people in its branch location - would be exempt. We've already heard from member companies who face a risk of losing their people because of the potential mandate. One member company reported they already have 10% of their positions open, and applying this mandate to them could cause them to lose another 20% of their workforce. This situation would be neither fair nor workable and is harmful to our food supply chain and rural economies.

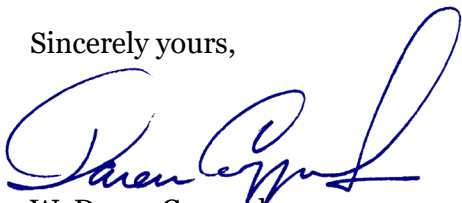
Agricultural retailers were determined by the Department of Homeland Security (DHS) to be critical infrastructure in the early days of the COVID pandemic because they provide essential products and services for the production of food. Care should be taken to not disrupt this supply chain by sending an avoidable shock through employee ranks when it is already difficult to hire and retain quality employees.

A much better approach would be to focus the efforts of the federal government on restoring the credibility and capacity of regulatory and scientific institutions, and encouraging creative voluntary employer approaches to vaccine incentives. Many companies have begun offering bonuses or access to paid sick leave for employees who are vaccinated, and at least one has instituted a health insurance surcharge for employees who decline to be vaccinated. These approaches can be custom crafted by the employer to fit their own situation and will be more successful than an inflexible federal one-size-fits-all mandate. They do not take away the free will of employees, but they do hold employees accountable for the consequences of the choices they make. This method will be much more successful.

Your Administration has an opportunity to either enable an employer-led, incentive-based approach that could lead to better vaccination rates and turning down the rhetorical heat on the issue of vaccinations; or to create a mandate that will further deepen the philosophical divides, will be impractical and harmful to implement, will exacerbate already challenging supply chain disruptions and is likely to fail in either raising vaccination rates or unifying our country. Our organization would welcome an opportunity to work with your Administration to craft a successful program. If the Administration is set on a federal mandate, applying the employee threshold per location rather than across the entire company would alleviate some of our members' concern.

We share the goal of putting COVID behind us for good. Let's work together on positive measures to make that happen without causing further damage to our economy, society or nation.

Sincerely yours,



W. Daren Coppock
President & CEO
Agricultural Retailers Association

Cc: The Honorable Martin J. Walsh, United States Secretary of Labor
The Honorable James Frederick, Acting Assistant Secretary of Labor for Occupational Safety and Health, USDOL-OSHA