



March 20, 2020

Dear Mr. President and State Governors,

On behalf of the membership of the Society of Chemical Manufacturers & Affiliates (SOCMA), I commend you for your leadership in confronting the COVID-19 pandemic. As federal, state, and local efforts to contain the spread and severity of the coronavirus intensify, I would like to highlight the critical role that specialty and fine chemical manufacturing plays in the global supply chain, and stress the importance of maintaining the operations of such facilities during this unprecedented crisis.

SOCMA is the national trade association dedicated to supporting the specialty and fine chemical industry, a market valued at \$300 billion annually. We represent companies that manufacture innovative chemistries that enable and enhance the ability of products to combat the COVID-19 pandemic. Our members produce a multitude of vital chemistries, including:

- Disinfectants, surfactants, foaming agents, pH adjusters, and binders that make cleaning and personal hygiene products effective at eliminating bacteria and viruses.
- Active pharmaceutical ingredients (APIs), which are the central functional ingredient in both prescription and over the counter drug products, along with reagents, excipients, binders, and intermediates used in their manufacture.
- Polymers, thermoplastics, resins, and other key ingredients necessary not only for the production of medicines and vaccines but also medical devices including blood and IV bags, tubing, syringes, masks, and gowns.
- Fertilizers, pesticides, adjuvants, biocides, and other agrochemicals that support crop and livestock production, protect feedstocks from mold, and ensure the nation's food supply is not disrupted.
- Oil, gas and diesel chemicals, jet fuel ingredients, and other fossil fuel additives crucial to the logistics, shipping, and transportation sectors.
- Color pigments used in printing ink formulas and the adhesives used to adhere them to pharmaceuticals and medical devices, labels for sanitary, agriculture, and food products, as well as coatings, plastics, and composite materials essential to consumers.
- Materials used in making printed circuit boards and semiconductors essential to the functioning of electronics such as medical equipment, telecommunications technologies, computers, and phones.
- Catalysts used in the production of chemicals, petrochemicals, pharmaceuticals and pollution control products.
- Reagents used in research, quality control, and diagnostic products and test kits.

Specialty chemicals are fundamental to the continued operation of every manufacturing sector and have a key role to play in protecting the public health of Americans. **It is therefore essential that chemical facilities are allowed to continue to operate and provide essential materials during this crisis.** As jurisdictions increasingly consider implementing orders for the closure of nonessential businesses, our members urge your administration to consider designating chemical manufacturing as essential commercial activity and exempt our industry from further operating restrictions.

We appreciate that the U.S. Department of Homeland Security (DHS) has gone as far as to classify the Chemical Sector as a Critical Infrastructure Sector. DHS intends for the designation to “support State, Local, and industry partners in identifying the critical infrastructure sectors and the essential workers needed to maintain the services and functions Americans depend on daily and that need to be able to operate resiliently during the COVID-19 pandemic response.”¹ Several states including California, New York, and Pennsylvania have already deemed chemical manufacturing as essential business activity in recognition of this federal guidance.

If specialty chemical manufacturing is not designated essential and allowed to operate, it also poses severe ramifications to the sustainability of our members’ facility operations. Imminent and abrupt shutdowns are not practicable to the complexities of the specialty chemical sector, which manufactures on the basis of non-automated batch processes. To safely and effectively institute a plant closure under such conditions, the process can take days to complete, and can potentially take longer depending on the reactivity of the chemical products being manufactured, processed, or stored on-site. Ultimately if a plant does shutdown, essential personnel may still be needed to support site security, public safety, and to ensure chemical materials, processes, and equipment remain stable while idle.

Our members are applying aggressive measures to prevent the spread of infection at their facilities while maintaining or expanding production to meet increasing demand. Most chemical facilities are asset heavy operations with low densities of employees and no public (retail) interaction. Production and laboratory staff are separated into distinct unit operations that provide social distancing in the facilities as a normal condition.

Our members remain committed to protecting the environment, health, and safety of their employees and communities. We welcome opportunities to communicate and collaborate on how our industry can support you as we navigate these difficult times.

We value your consideration and continued leadership.

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer Abril". The signature is fluid and cursive, with the first name being more prominent.

Jennifer Abril
President and CEO

¹ Memorandum: “Guidance on the Essential Critical Infrastructure Workforce: Ensuring Community and National Resilience in COVID-19 Response”. U.S. Department of Homeland Security Cybersecurity & Infrastructure Security Agency (CISA). March 19, 2020.