

July 31, 2021

Submitted Electronically



Ms. Princy Doss
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Mr. Jay Withrow, Director
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RE: Comments of the Virginia Farm Bureau Federation Regarding Proposed Amendments to 16VAC25-220, Permanent Standard for Infectious Disease Prevention of the SARS-CoV2 Virus That Causes COVID-19

Dear Ms. Doss and Mr. Withrow:

The Virginia Farm Bureau Federation (VFBF) appreciates the opportunity to provide comments on the Proposed Amendments to 16VAC25-220, Permanent Standard for Infectious Disease Prevention of the SARS-CoV2 Virus That Causes COVID-19. Our organization previously commented on the Standard, and we remain opposed to the permanent regulation that has adopted a static standard for an evolving pandemic.

The health and safety of our 35,000 farm family members continues to be our top priority today, as it was at the start of the pandemic. As essential workers, Virginia's farmers and their employees have gone above and beyond their charge to maintain a safe and abundant food supply, while complying and monitoring the complex and ever-changing guidance, rules, regulations, and executive orders since the beginning of the pandemic.

On at least three previous occasions, VFBF outlined our reasons for opposing the Standard in detailed comments, and proposed revisions that would make the Standard more workable and effective. We noted that the continuously updated guidance issued by the Occupational Safety and Health Administration (OSHA) and the Centers for Disease Control and Prevention (CDC) are the most appropriate mechanism to guide prevention measures, and were exceedingly effective in controlling outbreaks and ensuring safety in the agriculture industry when implemented in mid-2020.

It is our hope that the board will consider repealing the permanent standard, and will instead rely on OSHA and CDC guidelines, and place trust in their resources, research, and flexible nature. We have seen three "waves" of COVID since the start of the pandemic. We have seen global Alpha, Beta, Gamma, and Delta variants of concern. We know that this virus can move and evolve faster than this regulatory process, so we must stop placing permanent standards in place to respond to this ever-changing pandemic.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Wayne Pryor", written over a white background.

Wayne Pryor
President & CEO
Virginia Farm Bureau