March 20, 2020

The Honorable Bill Lee
Governor
State Capitol
Nashville, TN 37243

RE: Essential Business Operations During COVID-19

Dear Governor Lee:

On behalf of the Tennessee Forestry Association members, thank you very much for your leadership addressing the COVID-19 crisis, an unprecedented public health event. We appreciate the enormity of the situation you are facing and the effect it is having on the people in our state.

As Executive Director of the Tennessee Forestry Association, I am writing you to provide clarity of any potential emergency "Shelter in Place" (SHIP) orders, should you make a decision to take that next step.

WHAT TENNESSEE’S WOOD PRODUCTS INDUSTRY IS DOING TO IMPLEMENT STATE EXECUTIVE ORDERS

Given the magnitude of the COVID-19 outbreak, our members are taking steps to comply with state and federal regulations and guidance designed to slow the spread of the virus. For example, we are instituting the following at our mills:

1. Following CDC guidelines for the prevention of virus transmission. Emphasizing social distancing in meetings and in routine interactions.

2. Enacting strict return-to-work evaluation protocols for all employees who are returning from any illness or travel.

3. Restricting visitor access to the mill to only approved visitors.

4. Reducing or eliminating meetings and trainings while changing to conference calls or on-line meeting practices for essential interactions.

5. Limiting deliveries to essential shipments.
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1. Requiring non-operational personnel to work from home when possible.

2. Limiting access to Operations Control Rooms.

3. Restricting or eliminating business related travel.

4. Conducting strict sanitation practices, in particular at shift changes for operating staff.

5. Educating on best practices for work and home.

The safety of our employees remains a priority, as such, manufacturing sites are accepting visitors on a case by case basis. Additional communications about inspections or site visits should take place up front to ensure the safety of all involved.

At the Tennessee Forestry Association, we sincerely hope current measures are sufficient to get in front of the spread of the virus, but realize that additional steps may needed to be taken to further address this outbreak.

**ESSENTIAL BUSINESSES**

We are closely monitoring the actions taken in other states, including the "Shelter in Place" order placed on counties in California. Should Tennessee deem it necessary to follow similar measures, it is critical for our wood industries, employees and the general public that pulp and paper mills, sawmills, secondary wood manufacturers and their raw materials distribution supply chain (including, but not limited to) loggers, converting plants and businesses involved in the distribution and sale of our essential products be designated as "Essential Businesses" conducting "Essential Activities" and excluded from the restrictions of any such orders.

The Tennessee Forestry Association is making this request to you to ensure the continuity of paper and lumber products manufacturing for the following reasons:

1. "Essential Business" Activities

Tennessee's wood products industry employs 42,000 Tennesseans with most mills and logging contractors residing in and supporting the economies in rural and distressed counties in our state. Throughout rural Tennessee, there are 4 pulp and paper mills, 244 sawmills, over 2,200 Tennessee Master Logger contractors plus the logging crew members. Our association members manufacture essential products including toilet paper, paper towels, tissue, cardboard for shipping containers, food, hygiene and medical packaging, lumber and OSB building products, flooring, wood pallets for shipments and other necessary wood products. Along with hardwood lumber, our 244 sawmills provide the wood
chips and by-products to the pulp and papermills needed to manufacture paper products. Also, our wood products industry plays a crucial role in facilitating product safety and delivery, enhancing hygiene and is essential to responding to COVID-19 challenges. Disruptions in the availability of these critical goods and to the U.S. supply chain would cause significant hardships for the people of rural Tennessee, and affect the thousands of families whose income is generated by the wood products industry, both pulpwood and hardwood, and the loggers who providing the raw material to sustain our industry statewide.

2. Environmental Concerns:

Wastewater treatment systems cannot simply be turned off. Leaving these facilities unstaffed would present serious risk to the treatment system and water quality in Tennessee’s streams and rivers. Skilled operators must be allowed to continue access to their jobs in order to maintain critical environmental equipment.

Complete shutdown of the pulp and papermills, sawmills and other wood industries are typically only performed once per year and takes considerable planning and coordination to accomplish in order to prevent adverse environmental impacts. Typically the use of off-shift labor and double-staffing on all shifts is required to perform an orderly, safe shutdown. Having already reduced staff under social distancing guidelines our facilities would be unable to adequately plan for and execute complete shutdown in an orderly, safe and environmentally compliant manner.

Some mills provide essential services to the waterline that supplies both the mill and municipalities, ensuring a safe and reliable water supply.

In addition to the environmental impacts, being unstaffed would immediately cause legal non-compliance to a number of NPDES and other permit requirements; operational and compliance data would not be collected, there would not be on-site resources responding to changing system parameters and failures, preventative inspections would not be completed, and more.

3. Trade Exposure and Competitiveness

Pulp and papermills, sawmills and converting facilities compete in a global commodity-based market. Curtailment of production in Tennessee will ensure these essential products will be made elsewhere by competitors. This will have a long-lasting and adverse effect on our sectors' employees, as well as the economies of almost every rural Tennessee community and county in our state.

Our members and our association stands ready to assist you during this challenging time, and to serve as a resource needed if you look to create new orders related to business activities.
If you have questions, please contact me directly at edinwiddie@tnforestry.com; cell 615 969-9972; or at the Tennessee Forestry Association office 615 883-3832.

Sincerely,

Candace Dinwiddie
Executive Director