COVID-19 Vaccine Distribution: Getting Ready

COVID-19 vaccines should be quickly and safely distributed world-wide when they become available. Pending more detailed comments from global institutions, here are a few things express delivery carriers would like regulators to think about …

Product integrity should be a top priority

- **Identify the vaccines correctly**
  - The World Health Organization should publish an official list of all approved vaccines with their industry names and universal product IDs
  - The World Customs Organization should publicly recommend a standard Harmonised System (HS-6) classification for COVID-19 vaccines
  - Governments at the country of manufacturing should issue advance rulings for classification at origin and make them publicly available; all other countries should seek to recognize these rulings
- **Prevent counterfeit**
  - Governments and industry should maintain authorized/recognized supply chains for genuine vaccine products

Avoid border bottlenecks at crunch time

- COVID-19 vaccines will be temperature-sensitive and extremely urgent shipments. They should be:
  - cleared pre-arrival
  - declared an essential item
  - exempt from any export restriction
  - exempt from import duties and taxes
- The same data should be required for import and export clearance – if possible, under a specific WCO guideline
- Border authorities should refrain from random physical examinations; physical examinations, if any, shall be carried out only on a risk-basis and only at the end user's or other appropriate storage facilities (some vaccines may have to be stored at -70 C / -94 F)
- All border agencies should be aligned and – ideally - use electronic pre-arrival data simultaneously, recognize in advance the vaccine supply chain actors and respond to them about the release status through electronic channels within strictly defined time limits
- Let any specific transport equipment for the safe transport of vaccines (such as temperature-controlled containers) be considered as a ULD (Unit Load Device) and fall under temporary admission (and return) exempt from duty and bond/guarantee requirements
  - Clear the transport equipment inbound and outbound based on the transport manifest

Plan ahead to optimize logistics

- **Make sure air-cargo operators are pre-authorized to fly additional services without any restrictions (several thousand additional flights may be necessary world-wide)**;
  - Expedite the approval of slot, overflight and landing permit requests
  - Ensure that airports are ready to support exceptional operations and not constrained unnecessarily by day or night-time operating restrictions
  - Adopt the International Civil Aviation Organizations´s (ICAO) Public Health Corridor concept for air cargo crews and relief operations, which allow them to be exempt from quarantines, travel bans and (unless symptomatic) pre-departure and on-arrival testing requirements
- **To the extent certain vaccines may require use of dry ice for shipment, these shipments could cause CO2 concentrations that exceed the regulatory thresholds allowed for compartments occupied by crewmembers and other passengers**
  - Ask airplane manufacturers to review and update their guidance in this area urgently
  - All aircraft operators planning to support vaccine distribution should conduct a safety risk assessment to evaluate the effectiveness of their procedures that allow such transport

- **Publish guidance for vaccine shippers and manufacturers to ensure that they have appropriate resources necessary to streamline the distribution of vaccines. For example:**
  - Guidance on the dangerous goods shipping requirements for dry ice (if used as a refrigerant) or other applicable UN dangerous goods classifications that may be required (e.g. UN3245 Genetically modified organisms) so that operators are not forced to reject shipments for non-compliance
  - Where shipments containing dry ice come directly from manufacturers using standard processes, consider applying an audit process rather than individual acceptance for every shipment
  - Guidance that encourages shippers and manufacturers who plan to use RFID or GPS data loggers to ensure their supply chain partners have approved such devices ahead of time
- **Facilitate cross-border road haulage and open dedicated lanes at land crossings**
  - Simplify requirements and where possible automate registration procedures for drivers carrying vaccines
  - Ensure uninterrupted transit of vaccine transport to their final destination: Customs, police, military and other security services to refrain from stopping vaccine transports at inland checkpoints
- Either make available or ensure rapid planning and development of **temperature-controlled facilities** for the priority storage of vaccines, if necessary
- In a coordinated effort, all government levels (Central/Federal, Regional/State, and Local) should **identify any regulatory requirements**, licenses or approvals normally needed to distribute, store or supply other logistical support to vaccine distribution **that should be expedited or temporarily waived**

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