

JAXPORT

September 21, 2020

Port Canaveral

Maritime Unit
 Centers for Disease Control and Prevention (CDC)
 1600 Clifton Road NE, MS V18-2
 Atlanta, GA 30329

Port Everglades

RE: Docket No. CDC-2020-0087

Port of Fernandina

The Florida Ports Council (FPC) serves as the professional association for Florida's 14 deepwater public seaports and their management. Seaports are one of the state's greatest economic assets, positively affecting every region and every resident. Whether moving over a hundred million tons of cargo annually or millions of cruise passengers, Florida's seaports generate and support a vast array of commerce. These seaports are the gateway for shipment of goods into and out of Florida and link our state to vital international markets. Prior to this pandemic, our seaports had a \$117.6 billion economic impact on the state and account for more than 900,000 direct and indirect jobs.

Port of Fort Pierce

Port of Key West

PortMiami

We appreciate the measured response by the CDC and others to help this nation react to the impact of COVID-19 on our citizens and economy. Through a myriad of federal, state and local efforts every business activity but cruise passenger operations have restarted their operations under new guidelines to ensure the safety of the public and workers. Cruise passenger operations remain the only industry that has not been permitted to operate under any guidelines issued by federal health or safety officials.

Port Manatee

Port of Palm Beach

The cruise industry makes an enormous contribution to the state of Florida and is one of the state's largest employers. The industry contributes over \$8.5 billion to Florida's economy. Florida seaports account for close to two-thirds of all U.S. cruise embarkations and is the home to the top three cruise ports in the world. Carnival Corporation, Norwegian Cruise Line Holdings and Royal Caribbean Cruises, Ltd., which combined control more than three-fourths of the North American cruise industry's capacity, have their headquarters in Miami, as do other cruise lines. The purchases and other financial aspects of the cruise industry on Florida affect virtually every industry in the country and the state. These activities support over 154,000 jobs in Florida alone, and a total personal income impact on this state of \$7.7 billion dollars.

Port of Panama City

Port of Pensacola

Port of Port St. Joe

Port St. Pete

The impact of this passenger industry is also felt throughout this nation and hemisphere. Cargo and other consumer activity transiting Florida's seaports to the Caribbean and other parts of Latin America also support tourism activity generated by the cruise industry during ports of. The inability of the cruise industry to commence operations continues to have a detrimental impact in

Port Tampa Bay

Florida and beyond. In Florida alone, we estimate that economic activity losses will exceed \$22 billion through 2020. If the cruise industry is still unable to operate into 2021, these economic losses will continue to mount for Florida and this nation.

We appreciate the efforts of the CDC to collect information to help ensure the safe resumption of passenger operations at Florida's seaports. In response to your request for information, we offer the following responses to questions relevant to Florida's seaports.

Question 6a – what arrangements should cruise ship operators have with private companies to transport and obtain medical care shoreside for passengers and crew with several COVID-19?

Answer – Currently all severe medical emergencies are handled by cruise ship operators using available transportation services for severe cases of confirmed COVID-19. We recommend that this activity by the cruise ship operators continue as currently provided.

Question 7 – what pre-arrangements should be made to ensure that all U.S. seaport communities will accept a returning ship after a COVID-19 outbreak is identified?

Answer -- The Florida Department of Health and the CDC currently have cooperative state/federal procedures to deal with existing COVID-19 cases in Florida. Prior to the federal order to cease all cruise activities at Florida seaports, the agencies worked with a layered command and control organization of cruise lines, local health agencies, healthcare providers, federal agencies (i.e. U.S. Customs and Border Protection and the U.S. Coast Guard) and port authorities to safely remove non-infected passengers and infected passengers from impacted cruise vessels.

Based on this experience, we recommend that the CDC in partnership with the Florida Department of Health develop a set of guidelines and protocols for the transportation and medical treatment for any people onboard a returning ship after a COVID-19 outbreak is identified. Guidelines should include procedures for testing prior to disembarkation, location and duration of any necessary isolation or quarantine, medical testing and surveillance procedures, and procedures for ending isolation or quarantine. Once these guidelines have been established, cruise ship operators and local communities can then develop necessary solutions to implement appropriate procedures.

Question 8 – what plans should cruise ship operators have for operationalizing shoreside quarantine facilities in the event of a COVID-19 outbreak on board a ship, without exposing the public and without relying on Federal, State, or local resources?

Answer – Operational plans developed by cruise ship vessels for future voyages should identify adequate shoreside quarantine facilities, including quarantine and transportation services that could be used to isolate and quarantine affected passengers and crew. We recommend that cruise ship operators collaborate with local port authorities to make necessary arrangements prior to the start of any voyage.

Question 16a – should cruise ship operators deny boarding to passengers with COVID-like illness or confirmed infection with COVID-19?

Answer – Passengers with possible, probable, or confirmed COVID-19 illness should be denied boarding. Cruise lines should develop pre-boarding protocols to efficiently assure that passengers of concern are segregated for further examination, and if needed, safely removed from the terminal facility, limiting exposure to others.

Question 16b – should cruise ship operators deny boarding to passengers with known exposure to a person with COVID-19 during the previous 14 days?

Answer – Passengers with possible, probable, or confirmed COVID-19 illness and close contact with a person with COVID-19 during the past 14 days should be denied boarding.

Question 16c – what methods should cruise ship operators use to screen for exposures and detect COVID-like illness in passengers seeking to board the ship?

Answer – the U.S. maritime industry (including the cruise industry) and federal, state and local first responders currently use a layered approach for a variety of security and health procedures at our nation's seaports. We recommend a similar layered approach for medical screening at our nation's seaports. This layered approach could include requirements for a diagnostic test within 72 hours prior to embarkation or a rapid test prior to boarding the ship, the completion of a health screening questionnaire prior to travel (and submitted to the cruise line for approval), and multiple symptom tests prior to boarding public transportation and prior to transiting a cruise terminal. Cruise lines have experience in pre-boarding protocols for security and business reasons and could integrate additional health protocols into a pre-boarding process.

Question 16d – should cruise ship operators deny boarding to passengers coming from COVID-19 high-incidence geographic areas?

Answer – Passengers traveling from such geographic areas in the U.S. should be allowed to board the vessel so long as they present proof of a negative diagnostic

test within 72 hours of embarkation and successfully complete other required screening. If a travel ban is in effect from a geographic area outside of the U.S., those passengers should be screened at air or land ports of entry well in advance of arriving at the cruise terminal or vessel.

Question 16e – how should cruise ship operators manage embarking crew with COVID-like illness, known exposure, or coming from high-incidence geographic areas after resuming passenger operations?

Answer – Cruise ship operators should deny boarding for any crew members with possible, probable, or confirmed COVID-like illness, or close contact with any know exposure within the past 14 days. However, crew members with a negative diagnostic test within 72 hours of embarkation should be permitted to board provided such crew members quarantine for at least 14 days in isolated rooms onboard the vessel. Crew members should be subject to routine medical screening to mitigate the risk of transmission.

Question 16f – should cruise ship operators test passengers and crew pre-board. If yes, what should the testing protocol be?

Answer – similar to the answers for questions 16c and 16d, cruise ship operators should adopt a layered approach to medical screening. This can include proof of a negative diagnostic test at least 72 hours prior to embarkation or the requirement to complete a rapid test prior to boarding the ship.

Question 16g – should cruise ship operators transport and house passengers and crew denied boarding at the seaport to avoid exposing the public?

Answer – Cruise ship operations should not be required to arrange for private transportation and accommodation for any passenger denied transit through cruise terminals or boarding the vessel. With respect to similar passenger activities at airlines or passenger rail travel, those industries are not held responsible for subsequent housing or transportation of passengers denied travel because of COVID-19 illness. We recommend a similar standard for the cruise industry, individual travelers that are denied embarkation due to COVID-19 illness should follow CDC and state requirements for quarantine and travel.

Cruise ship operators should utilize designated quarantine facilities ashore or identified travel services for crew denied boarding at the seaport.

Question 22 – what precautions should the cruise industry take to safely disembark passengers and crew without transmitting COVID-19 into local seaport communities?

Answer – the guidelines suggested under question 7 should include protocols to notify the seaport and other federal, state and local officials if there is a COVID-19 confirmed or probable case onboard the vessel. As also suggested in the answer to question 7, those guidelines should include procedures for testing prior to disembarkation, location and duration of any necessary isolation or quarantine, medical testing and surveillance procedures, and procedures for ending isolation or quarantine. Once these guidelines have been established, cruise ship operators and local communities can then develop necessary solutions to implement appropriate procedures.

Question 26a – how should cruise ship operators decrease or eliminate the risk for COVID-19 transmission for both passengers and crew during embarkation and disembarkation?

Answer – Similar to the guidelines suggested for questions 7 and 22, guidelines should be developed by the Florida Department of Health and the CDC to maintain clean cruise terminal facilities and maintain social distancing. Guidelines should include appropriate cleaning and sanitizing procedures, and embarkation and disembarkation procedures to ensure appropriate social distancing and transmission mitigation policies. Once these guidelines have been established, cruise ship operators and others can develop necessary solution to implement appropriate procedures.

Florida cruise terminal operators proactively initiated cleaning protocols directed at mitigating COVID-19 transmission in these terminals as cruise operations were shut down earlier in the year. These protocols can be adjusted as needed based on any updated required procedures, in coordination with government and industry partners.

Thank you for your consideration of the Florida Ports Council's responses to this request for information. We look forward to working with the CDC and the Florida Department of Health to help ensure the safe resumption of passenger operations at Florida's seaports.

Sincerely,



Doug Wheeler,
President & CEO