





COVID-19 INDUSTRY GUIDANCE:

Food Packing and Processing





July 29, 2020

covid19.ca.gov

OVERVIEW

On March 19, 2020, the State Public Health Officer and Director of the California Department of Public Health issued an order requiring most Californians to stay at home to disrupt the spread of COVID-19 among the population.

The impact of COVID-19 on the health of Californians is not yet fully known. Reported illness ranges from very mild (some people have no symptoms) to severe illness that may result in death. Certain groups, including people aged 65 or older and those with serious underlying medical conditions, such as heart or lung disease or diabetes, are at higher risk of hospitalization and serious complications. Transmission is most likely when people are in close contact or in a poorly ventilated area with an infected person, even if that person does not have any symptoms or has not yet developed symptoms.

Precise information about the number and rates of COVID-19 by industry or occupational groups, including among critical infrastructure workers, is not available at this time. There have been multiple outbreaks in a range of workplaces, indicating that workers are at risk of acquiring or transmitting COVID-19 infection. Examples of these workplaces include hospitals, long-term care facilities, prisons, food production, warehouses, meat processing plants, and grocery stores.

As stay-at-home orders are modified, it is essential that all possible steps be taken to ensure the safety of workers and the public.

Key prevention practices include:

- ✓ physical distancing to the maximum extent possible,
- ✓ use of face coverings by workers (where respiratory protection is not required) and customers/clients,
- ✓ frequent handwashing and regular cleaning and disinfection,
- ✓ training workers on these and other elements of the COVID-19 prevention plan.

In addition, it will be critical to have in place appropriate processes to identify new cases of illness in workplaces and, when they are identified, to intervene quickly and work with public health authorities to halt the spread of the virus.

PURPOSE

This document provides guidance for facilities that process or pack meat, dairy, or produce to support a safe, clean environment for workers. The guidance is not intended to revoke or repeal any worker rights, either statutory, regulatory or collectively bargained, and is not exhaustive, as it does not include county health orders, nor is it a substitute for any existing safety and health-related regulatory requirements such as those of Cal/OSHA.¹ Stay current on changes to public health guidance and state/local orders, as the COVID-19 situation continues. Cal/OSHA has more comprehensive guidance on their <u>Cal/OSHA Interim General Guidelines on</u> <u>Protecting Workers from COVID-19 webpage</u>. CDC and federal OSHA have specific guidelines for <u>Meat and Poultry Processing</u>.

Required Use of Face Coverings

On June 18, CDPH issued <u>Guidance on the Use of Face Coverings</u>, which broadly requires the use of face coverings for both members of the public and workers in all public and workplace settings where there is a high risk of exposure.

People in California must wear face coverings when they are engaged in work, whether at the workplace or performing work off-site, when:

- Interacting in-person with any member of the public;
- Working in any space visited by members of the public, regardless of whether anyone from the public is present at the time;
- Working in any space where food is prepared or packaged for sale or distribution to others;
- Working in or walking through common areas, such as hallways, stairways, elevators, and parking facilities;
- In any room or enclosed area where other people (except for members of the person's own household or residence) are present when unable to physically distance;
- Driving or operating any public transportation or paratransit vehicle, taxi, or private car service or ride-sharing vehicle when passengers are present. When no passengers are present, face coverings are strongly recommended.

Complete details, including all requirements and exemptions to these rules, can be found in the <u>guidance</u>. Face coverings are strongly encouraged in other circumstances, and employers can implement additional face covering requirements in fulfilling their obligation to provide workers with a safe and healthful workplace. Employers must provide face coverings to workers or reimburse workers for the reasonable cost of obtaining them.

Employers should develop an accommodation policy for any worker who meets one of the exemptions from wearing a face covering. If a worker who would otherwise be required to wear a face covering because of frequent contact with others cannot wear one due to a medical condition, they should be provided with a non-restrictive alternative, such as a face shield with a drape attached to the bottom edge, if feasible, and if the medical condition permits it.

Businesses that are open to the public should be cognizant of the exemptions to wearing face coverings in the <u>CDPH Face Covering Guidance</u> and may not exclude any member of the public for not wearing a face covering if that person is complying with the <u>guidance</u>. Businesses will need to develop policies for handling these exemptions among customers, clients, visitors, and workers.



Worksite Specific Plan

- Establish a written, worksite-specific COVID-19 prevention plan at every location, perform a comprehensive risk assessment of all work areas and work tasks, and designate a person at each establishment to implement the plan.
- Incorporate the <u>CDPH Face Covering Guidance</u> into the Workplace Specific Plan and include a policy for handling exemptions.
- Identify contact information for the local health department where the operation is located for communicating information about COVID-19 outbreaks among workers or customers.
- Train and communicate with workers and worker representatives on the plan and make the plan available to workers and their representatives.
- Regularly evaluate the establishment for compliance with the plan and document and correct deficiencies identified.
- Investigate any COVID-19 illness and determine if any work-related factors could have contributed to risk of infection. Update the plan as needed to prevent further cases.
- Implement the necessary processes and protocols when a workplace has an outbreak, in accordance with <u>CDPH</u> <u>guidelines</u>.
- Identify close contacts (within six feet for 15 minutes or more) of an infected worker and take steps to isolate COVID-19 positive worker(s) and close contacts.
- Adhere to the guidelines below. Failure to do so could result in workplace illnesses that may cause operations to be temporarily closed or limited.



Topics for Worker Training

- Information on <u>COVID-19</u>, how to prevent it from spreading, and which underlying health conditions may make individuals more susceptible to contracting the virus.
- Self-screening at home, including temperature and/or symptom checks using <u>CDC guidelines</u>.
- The importance of not coming to work:

- If a worker has symptoms of COVID-19 as <u>described by the CDC</u>, such as a fever or chills, cough, shortness of breath or difficulty breathing, fatigue, muscle or body aches, headache, new loss of taste or smell, sore throat, congestion or runny nose, nausea, vomiting, or diarrhea, OR
- If a worker was diagnosed with COVID-19 and has not yet been released from isolation, OR
- If, within the past 14 days, a worker has had contact with someone who has been diagnosed with COVID-19 and is considered potentially infectious (i.e. still on isolation).
- To return to work after a worker receives a COVID-19 diagnosis only if 10 days have passed since symptoms first appeared, their symptoms have improved, and the worker has had no fevers (without the use of fever reducing medications) for the last 72 hours. A worker without symptoms who was diagnosed with COVID-19 can return to work only if 10 days have passed since the date of the first positive COVID-19 test.
- To seek medical attention if their symptoms become severe, including persistent pain or pressure in the chest, confusion, or bluish lips orface. Updates and further details are available on <u>CDC's</u> <u>webpage</u>.
- The importance of frequent handwashing with soap and water, including scrubbing with soap for 20 seconds (or using hand sanitizer with at least 60% ethanol (preferred) or 70% isopropanol (if the product is inaccessible to unsupervised children) when workers cannot get to a sink or handwashing station, per <u>CDC guidelines</u>).
- The importance of physical distancing, both at work and off work time (see Physical Distancing section below).
- Proper use of face coverings, including:
 - Face coverings do not protect the wearer and are not personal protective equipment (PPE).
 - Face coverings can help protect people near the wearer, but do not replace the need for physical distancing and frequent handwashing.
 - Face coverings must cover the nose and mouth.
 - Workers should wash or sanitize hands before and after using or adjusting face coverings.
 - Avoid touching the eyes, nose, and mouth.

- Face coverings must not be shared and should be washed or discarded after each shift.
- Information contained in the <u>CDPH Guidance for the Use of Face</u> <u>Coverings</u>, which mandates the circumstances in which face coverings must be worn and the exemptions, as well as any policies, work rules, and practices the employer has adopted to ensure the use of face coverings. Training should also include the employer's policies on how people who are exempted from wearing a face covering will be handled.
- Ensure any independent contractors, temporary, or contract workers at the facility are also properly trained in COVID-19 prevention policies and have necessary supplies and PPE. Discuss these responsibilities ahead of time with organizations supplying temporary and/or contract workers.
- Information on paid leave benefits the worker may be entitled to receive that would make it financially easier to stay at home. See additional information on government programs supporting sick leave and workers' compensation for COVID-19, including workers' sick leave rights under the Families First Coronavirus Response Act and workers' rights to workers' compensation benefits and presumption of the workrelatedness of COVID-19 pursuant to the Governor's Executive Order N-62-20 while that Order is in effect.



Individual Control Measures and Screening

- Provide temperature and/or symptom screenings for all workers at the beginning of their shift and any personnel entering the facility. Make sure the temperature/symptom screener avoids close contact with workers to the extent possible.
- If requiring self-screening at home, which is an appropriate alternative to providing it at the establishment, ensure that screening was performed prior to the worker leaving the home for their shift and follows <u>CDC</u> <u>guidelines</u>, as described in the Topics for Worker Training section above.
- Encourage workers who are sick or exhibiting symptoms of COVID-19 to stay home.
- Employers must provide and ensure workers use all required protective equipment, including eye protection and gloves where necessary.
- Employers should consider where disposable glove use may be helpful to supplement frequent handwashing or use of hand sanitizer; examples are for workers who are screening others for symptoms or handling commonly touched items.

 Non-workers entering the facility should be restricted to only those classified as essential by management and should complete a temperature and/or symptom screening before entering. Contractors, drivers, and all U.S. Department of Agriculture (USDA) or U.S. Food and Drug Administration (FDA) inspectors, and other regulatory officials entering the plant should wear face coverings.



Cleaning and Disinfecting Protocols

- Perform thorough cleaning in high traffic areas, such as break rooms, lunch areas, changing areas, workstations and areas of ingress and egress including stairways, stairwells, handrails, and elevator controls. Frequently disinfect commonly used surfaces, including time clocks, bathroom fixtures, break room tables and chairs, locker rooms, and vending machines.
- Implement disinfection procedures in non-production areas (welfare areas, hallways, etc.) to support enhanced hand hygiene practices.
- All tools, equipment and controls should be cleaned between shifts or between users, whichever is more frequent. Coordinate cleaning product use with the USDA and/or FDA if used in food production areas.
- Ensure delivery vehicles and equipment are cleaned before and after delivery routes, carry additional sanitation materials during deliveries, and use clean personal protective equipment for each delivery stop.
- Avoid sharing phones, desks, offices, or other work tools and equipment, when possible. If necessary, clean and disinfect them before and after each use.
- Hard hats and face shields must be sanitized at the end of each shift. Clean the inside of the face shield, then the outside, then wash hands.
- Ensure sanitary facilities (restrooms and handwashing stations with soap and hand sanitizer) are provided at all workplaces. Ensure that these facilities stay operational and stocked at all times and provide additional soap, paper towels, and hand sanitizer when needed. Notouch sinks, soap dispensers, sanitizer dispensers, and paper towel dispensers should be installed whenever possible.
- To minimize the risk of <u>Legionnaires' disease</u> and other diseases associated with water, <u>take steps</u> to ensure that all water systems and features are safe to use after a prolonged facility shutdown.
- Where possible, do not clean floors by sweeping or other methods

that can disperse pathogens into the air. Use a vacuum with a HEPA filter wherever possible.

- Provide time for workers to implement cleaning practices during their shift. Cleaning assignments should be assigned during working hours as part of the worker's job duties.
- Stagger breaks and provide additional sanitary facilities if feasible and necessary to maintain physical distancing during scheduled breaks.
- When choosing disinfecting chemicals, employers should use products approved for use against COVID-19 on the <u>Environmental Protection</u> <u>Agency (EPA)-approved</u> list and follow product instructions. Use disinfectants labeled to be effective against emerging viral pathogens, diluted household bleach solutions (5 tablespoons per gallon of water), or alcohol solutions with at least 70% alcohol that are appropriate for the surface. Provide workers training on the chemical hazards, manufacturer's directions, ventilation requirements, and Cal/OSHA requirements for safe use. Workers using cleaners or disinfectants should wear gloves and other protective equipment as required by the product instructions. Follow the <u>asthma-safer cleaning methods</u> recommended by the California Department of Public Health and ensure proper ventilation.
- Consider installing portable high-efficiency air cleaners, upgrading the building's air filters to the highest efficiency possible, and making other modifications to increase the quantity of outside air and ventilation in offices and other spaces.
- If fans are used in the facility, ensure that fans blow clean air at the workers' breathing zone.
- Modify offerings in on-site cafeterias, including using prepackaged foods, and safe options for drink, condiment, and flatware dispensing.



Physical Distancing Guidelines

- Food processing workers often work in close proximity on industrial equipment and lines. In order to ensure these workers' safety, physical distancing in the workplace must be practiced. Implement measures to ensure physical distancing of at least six feet between workers whenever possible. This can include use of physical partitions or visual cues (e.g., floor markings, colored tape, or signs to indicate to where workers should stand).
- Modify the alignment of workstations, including along processing lines, if feasible, so that workers are at least six feet apart in all directions (e.g.,

side-to-side and when facing one another). Ideally, modify the alignment of workstations so that workers do not face one another. Consider using markings and signs to remind workers to maintain their location at their station away from each other and practice physical distancing on breaks.

- Use physical barriers, such as strip curtains, Plexiglas or similar materials, or other impermeable dividers or partitions, to separate packing or processing workers from each other, if feasible.
- Designate workers to monitor and facilitate distancing on processing floor lines.
- If necessary to ensure physical distancing, increase the number of shifts in a day, slow down the line speeds, and space out workers in accordance with CDC guidelines. Practice six-foot physical distancing to the greatest extent possible, even if this means production slows down.
- Employers may determine that adjusting processing or production lines, shifts, and staggering workers across shifts would help to maintain overall packing or processing capacity while measures to minimize exposure to the virus are in place. For example, a plant that normally operates on one daytime shift may be able to split workers into two or three shifts throughout a 24-hour period. In packing or processing plants, one shift may need to be reserved for cleaning and sanitization.
- Consider offering workers who request modified duties options that minimize their contact with customers and other workers (e.g., managing inventory rather than working as a cashier or managing administrative needs through telework).
- Consider cohorting (grouping together) workers. This can increase the
 effectiveness of altering the plant's normal shift schedules by making
 sure that groups of workers are always assigned to the same shifts with
 the same coworkers. Cohorting may reduce the spread of workplace
 transmission by minimizing the number of different individuals who come
 into close contact with each other over the course of a week. Cohorting
 may also reduce the number of workers quarantined because of
 exposure to the virus.
- Place additional limitations on the number of workers in enclosed areas to ensure at least six feet of separation to limit transmission of the virus.
- One-way pathways should be delineated to avoid workers coming into close contact in narrow hallways.
- Modify or stagger start times and alternate locker locations to increase physical distancing inside locker rooms and at the time clock.

- Because food processing workers often have uniform break times, which can mean hundreds of workers congregating in break rooms and cafeteria spaces at once, stagger breaks to limit the number of workers in a break room or cafeteria at the same time.
- Add barriers, remove or rearrange chairs and tables, or add partitions to tables, in break rooms and other areas workers may frequent to increase worker separation and ensure workers do not face each other. Identify alternative areas to accommodate overflow volume such as training and conference rooms or using outside tents for break and lunch areas.
- Limit the number of individuals in meetings and limit the number of participants in new hire orientations and other trainings. Provide virtual meeting and training opportunities wherever possible.
- Implement protocols to keep drivers in their trucks while on property, providing them a non-contact delivery protocol at the security gate.
- Designate drop-off locations to receive deliveries away from on-site high traffic areas. Maintain physical distance of at least six feet from delivery drivers. Do not shake hands.
- Call recipients ahead when making deliveries. Deliver to confirmed drop- off locations that eliminate physical contact with recipients.
- Encourage workers to avoid carpooling to and from work, if possible. If carpooling or using company shuttle vehicles is a necessity for workers, the following control practices should be used:
 - Limit the number of people per vehicle as much as possible. This may mean using more vehicles.
 - Encourage workers to maintain physical distancing as much as possible within the vehicle.
 - Encourage workers to use hand hygiene before entering the vehicle and when arriving at the destination.
 - Clean and disinfect commonly touched surfaces after each carpool or shuttle trip (e.g., door handles, handrails, seat belts, seat belt buckles).
 - Encourage workers to follow coughing and sneezing etiquette when in the vehicle.



Additional Guidelines

- Visit the <u>California Department of Food and Agriculture COVID-19</u> Website for additional guidance on:
 - o Livestock Markets,
 - o Farmers Markets,
 - o Farms and Ranches,
 - o Nurseries
 - o Other related facilities
- See the <u>CDC's update on Meat and Poultry Processing Facilities</u> for additional guidance.









11

¹Additional requirements must be considered for vulnerable populations. The food packing and processing industry must comply with all <u>Cal/OSHA</u> standards and be prepared to adhere to its guidance as well as guidance from the <u>Centers for Disease Control and Prevention (CDC)</u> and the <u>California Department of Public Health (CDPH)</u>. Additionally, employers must be prepared to alter their operations as those guidelines change.