

Emergency Prevention Measures to Achieve Physical (Social) Distancing in Food Manufacturing Facilities as Related to COVID-19

March 31, 2020

Version 2.1¹

Preface

In order to manage COVID-19 risks to employees it is critical for food manufacturing facilities to closely review current policies and procedures relative to current knowledge of the risks. The following guidance is based on our current knowledge of the virus and designed to help companies review and amend current policies.

Ultimately, each facility will need to implement their own policies tailored to their specific facilities and risks, recognizing that food is a critical infrastructure and facilities must remain operational in order to fulfill societal needs. Unless required by authorities, physical (social) distancing should be a tool, but not a requirement, in facilities needed to operate at capacity.

The U.S. Centers for Disease Control and Prevention (CDC) has defined close contact as:

- being within approximately 6 feet (2 meters) of a COVID-19 positive individual for a prolonged period of time; close contact can occur while caring for, living with, visiting, or sharing a healthcare waiting area or room with a COVID-19
- or**
- having direct contact with infectious secretions of a person with COVID-19 (e.g., being coughed on).²

In food manufacturing environments, potential for close contact can occur on or near production lines, receiving and packaging areas, sampling and quality rooms, and in common facility areas such as conference rooms, lunchrooms, locker rooms, restrooms, hallways, and entryways.

FDA acknowledges:

“...In food production/processing facilities and retail food establishments, an evaluation should be made to identify and implement operational changes that increase employee separation. However, physical distancing to the full 6 feet will not be possible in some food facilities.

... The risk of an employee transmitting COVID-19 to another is dependent on distance between employees, the duration of the exposure, and the effectiveness of employee hygiene practices and sanitation. When it's impractical for employees in these settings to maintain physical distancing, effective hygiene practices should be maintained to reduce the chance of spreading the virus...”³

¹ Change made: modification of title. No substantial change to recommendations. March 31, 2020.

² Interim US Guidance for Risk Assessment and Public Health Management of Persons with Potential Coronavirus Disease 2019 (COVID-19) Exposures: Geographic Risk and Contacts of Laboratory-confirmed Cases. <https://www.cdc.gov/coronavirus/2019-ncov/php/risk-assessment.html>. Accessed March 26, 2020.

³ FDA's Food Safety and the Coronavirus Disease 2019 (COVID-19) (<https://www.fda.gov/food/food-safety-during-emergencies/food-safety-and-coronavirus-disease-2019-covid-19>). Accessed March 26, 2020.

Note: Additional information is available as of March 26, 2020:

- CDC *Interim Guidance for Businesses and Employers to Plan and Respond to Coronavirus Disease 2019* (<https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html>).
- Department of Labor's Occupational Safety and Health Administration (OSHA) (https://www.osha.gov/SLTC/covid-19/additional_resources.html)
- FDA's Food Safety and the Coronavirus Disease 2019 (COVID-19) (<https://www.fda.gov/food/food-safety-during-emergencies/food-safety-and-coronavirus-disease-2019-covid-19>)

This Guidance is Intended to Assist in Developing More Site-Specific Plans

Avoid Close Contact Wherever Possible

Limiting person to person contact/proximity inside the food facility is critically important. Scientific and epidemiological evidence strongly suggests that good personal hygiene practices, including proper hand washing, is key and likely the difference between maintaining a safe environment and someone potentially getting infected and sick. Close contact with another individual is defined as being within 6 feet for a prolonged period of time **or** having direct contact with infectious secretions of a COVID-19 case (e.g., being coughed on).⁴ Walking past someone is unlikely to constitute "close contact."

NOTE: local and statewide ordinances and orders may contain alternate definitions. Be sure to consult any order from local authorities.

Entrances, Hallways, and Common Spaces and Personnel Movement in the Facility

- Depending on the area of a hallway or entryway, limit the number of persons to maintain physical distances as employees wait to come in or exit, move from room to room
- Find ways to minimize common surfaces employees need to touch:
 - Use auto open doors or encourage bumping doors open with hip or using foot on kick plate
 - Remove the door closure where possible and keep doors open to allow employees to move between doorways without touching knobs where it does not impact food safety zoning
 - Alternatively, foot pulls may also be added to doors with frequent traffic
- Propping interior doors to each office open whenever possible to improve air turnover in the building and decrease touching of knobs/handles
- Minimize hallway conversations and interactions

⁴ Interim US Guidance for Risk Assessment and Public Health Management of Persons with Potential Coronavirus Disease 2019 (COVID-19) Exposures: Geographic Risk and Contacts of Laboratory-confirmed Cases. <https://www.cdc.gov/coronavirus/2019-ncov/php/risk-assessment.html>. Accessed March 26, 2020.

Employee Clocking In/Out Practices

- Many timeclocks have web-based features that can be operated through phone apps.
- Alternatively, consider other inexpensive apps employees could use to track time and submit to supervisors.
- Use phones to clock in/out or provide additional sanitizer near the timeclock.
- Consider if a supervisor can use a camera from another room to clock employees in/out.
- Consider if clocking in/out can be handled by journal entry afterwards.

Locker Rooms and Entering/Exiting Production Floor

- Clean and laundered clothing is not considered a transfer vector for COVID-19.⁵
- To maintain uniform cleanliness and healthy employees, as best as possible, it is important employees enter the uniform area with clean hands.
- Touching non-selected uniform clothing and hangers should be kept to a minimum.
- Once the uniform is selected, place the now empty hanger on a different rack to avoid the hanger touching clean uniforms and from other employees handling the previously touched hanger.
- Keep soiled uniforms separate from clean uniforms.
- Frequent and proper hand washing and handling clean materials with clean hands is the best precautionary measure.

Common Tools

- Human machine interfaces such as keyboards, buttons, etc. should be sanitized between users.
 - Increased cleaning of touch screens in maintenance or receiving that aren't on the same GMP schedule as the ones in production.
- Common tools like brooms, rakes, scrapers, or hand tools should be sanitized after each use, especially between two separate users.
- Provide personal pens/sharpiers, alternatively sanitize them at least once per shift.
- Identify areas where employees frequently interact so intra-person sanitation procedures can be developed.

Shift Change Risks

- Stagger days, shifts, shift changes, breaks and lunches to avoid grouping.
- Order porta-potties with sinks/Provide outside tables for additional break areas.
 - Consider ordering for truck drivers, receiving teams, project or maintenance teams, shipping.
 - Drivers should use their own pens to sign or they should sanitize.
 - Make sure to include outdoor areas/porta-potties/tables in the cleaning and sanitation schedule.

⁵ Preventing the Spread of Coronavirus Disease 2019 in Homes and Residential Communities. <https://www.cdc.gov/coronavirus/2019-ncov/hcp/guidance-prevent-spread.html#precautions>, Accessed March 26, 2020.

- Identify individuals that do not need to come into the production restrooms and do not need to be using the same resources as the larger number of employees. Separate all teams into smaller groups and isolate them to separate bathrooms and break areas as possible.
- With some employees working remotely, determine if any office spaces can be repurposed for segregated lunch/changing areas.
- Use video apps or phone calls to prevent face-to-face contact during shift change.
- Use texting, chats, free conference calling to bring teams together remotely.
- Develop a protocol for exchange of product samples using common bin receptacles to transfer
- Limit exchange of files and paperwork to a minimum and avoid close contact
- Develop a protocol for any physical sign-off requirements to avoid close contact, limiting common use of writing instruments

Meals/Snacks/Break Room Activities

- Expand and stagger breaks and mealtimes for groups of employees to reduce the numbers of employees in break areas/cafeterias at any one time.
- Oftentimes, employers provide pizza or buffet-style meals, or employees will do potlucks. Shift from communal provisions to single-serve options. Or have a single trained employee serve employees in an enclosed area rather than having multiple employees taking food from a common container/with utensils being touched by multiple people.
- Consider using other conference rooms or separation space (rented tents) to distance employees.
- Intensify sanitation of refrigerator handles/sinks and faucets/kitchenette areas.
- Microwave handles and buttons should be sanitized after each use.
- Sanitize vending machines “touch points” to operator recommendations.
- Have sanitizing wipes and soap easily available in lunch and breakrooms and/or clean facilities after each break.

Engineering Controls (BC)

- Evaluate ventilation and UV and/or filters with a higher MERV rating.
- Increase ventilation rates.

Office/Clerical Work

- One person could be designated to get documents and scan these documents. Take precautions with gloves, washing hands, and sanitizing surfaces.
- Create walk-up windows for employees needing assistance from Human Resources.
- Separate and segregate office staff, ideally limiting offices to only one person per office space if required on-site and/or follow 6 feet distancing practice.
- Consider precautions such as gloves and/or sanitizers for those persons that go to the post office or bank based on the extent of community transfer and the assessment of risk.

- If work items need to be delivered to quarantined employee homes, set up a system and train to avoid inadvertent contact (e.g., leaving on a doorstep, putting in someone's open trunk).

Cleaning Laundry

For clothes that come in contact or potentially in contact with virus particles and sick individuals, the use of common detergents at the warmest temperatures recommended.⁶

- Wash items according to manufacturer's instructions
- Use the warmest setting and dry items completely
- NOTE: Dirty laundry that has been in contact with an unwell person can be washed with other peoples' items

For persons engaged in cleaning:

- Do not shake dirty laundry. This minimizes the possibility of dispersing virus in the air.
- Clean and disinfect anything used for transporting laundry with typical cleaning products.
- Wear disposable gloves while handling soiled items.
- Wash hands immediately after removing gloves or after handling dirty items.

Stream-line Monitoring Activities

- Consider if typically staffed areas that have infrequent interaction that can be handled via camera monitoring.
- Food safety versus quality: Consider whether there is a food safety risk versus an incidental quality risk when dealing with monitoring activities that involve human to human interaction.
 - For quality checks: Know what data is nice to have collected versus what is truly necessary/required. Streamline and minimize where historical data supports the decision, especially for quality metrics.
- If there are checks that will bring someone in close contact with another employee or there are resource constraints, consider if there are there checks that can be done less frequently, e.g. every 4 hours instead of hourly or other variables that can monitored remotely.

Facility-wide Communication and Employee Support, Training and Resources

- Provide specific instructions about illness reporting changes relative to COVID-19. FBI's [Food Industry Recommended Protocols When Employee/Customer Test Positive for COVID-19](#) is a resource.⁷
- Plant leadership observing and modeling proper hand washing practices as employees enter the plant to reinforce the importance of cleanliness.

⁶ Preventing the Spread of Coronavirus Disease 2019 in Homes and Residential Communities. <https://www.cdc.gov/coronavirus/2019-ncov/hcp/guidance-prevent-spread.html#precautions>, Accessed March 26, 2020.

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https://static1.squarespace.com/static/5e7d1107dac60a6b3e3f098d/t/5e7f42d6e8e5be5d58a14bfd/1585398488556/FBIA+COVID19%2BCase+Recommended+Protocols_25Mar2020+%28002%29.pdf. Accessed March 27, 2020.

- Online or remote training sessions for office staff to help with the transition to remote work.
- Remind managers to watch for employees who may be struggling in these stressful times.
- Add extra capacity to Employee Assistance Programs (EAP) help lines and remind employees about this resource and their services.
- Provide refresher training for employees on GMPs, proper hand washing, employee illness reporting, etc. and any other procedural changes the company has implemented to address COVID-19.
- Train employees how to recognize areas or practices which could pose a risk for spreading the virus. Define a process to quickly review and provide mitigation strategies in areas of concern.
- Consider the use of electronic communication devices such as wireless headphones, for loud/noisy areas, and walkie-talkies for less noisy areas; these may help employees communicate in production areas, but still maintain safe distancing. These can be useful for cross-training and training new employees.
- Provide resources to evaluate compliance.

Additional Considerations

- Minimize employee interaction with personal items.
- Limit non-essential visitors from entering the facility, this including other employees that are usually stationed at a different location.
- Limit traffic between work areas and buildings that is non-business essential.
- Train all any visitors on the new COVID-19 related procedures.
- Determine if scheduled audits can be postponed.
- Examples of physical distancing signs for manufacturer's may be available from third parties.

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