COVID-19 Guidance Updates for Meat and Poultry Processing Operations

The COVID-19 Pandemic has caused numerous meat and poultry processing plants to close due to outbreaks among workers. On April 26, 2020, the CDC and OSHA released Interim Guidance for addressing COVID-19 controls specific to workers and employers in beef, pork, and poultry operations. The link to the guidance:

https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/meat-poultry-processing-workers-employers.html

This guidance supplements but does not replace general guidance at these web sites:

• osha.gov/coronavirusexternal icon
• https://www.cdc.gov/coronavirus/2019-ncov/index.html
• https://www.cdc.gov/coronavirus/2019-ncov/community/critical-workers/implementing-safety-practices.html

Distinctive factors that affect workers' risk for exposure to COVID-19 in meat and poultry processing workplaces include:

• **Distance between workers** – meat and poultry processing workers often work close to one another on processing lines. Workers may also be near one another at other times, such as when clocking in or out, during breaks, or in locker/changing rooms.

• **Duration of contact** – meat and poultry processing workers often have prolonged closeness to coworkers (e.g., for 10-12 hours per shift). Continued contact with potentially infectious individuals increases the risk of COVID-19 transmission.

• **Type of contact** – meat and poultry processing workers may be exposed to the infectious virus through respiratory droplets in the air – for example, when workers in the plant who have the virus cough or sneeze. It is also possible that exposure could occur from contact with contaminated surfaces or objects, such as tools, workstations, or break room tables. Shared spaces such as break rooms, locker rooms, and entrances/exits to the facility may contribute to their risk.

• **Other distinctive factors that may increase risk among these workers include:**

  - A common practice at some workplaces of sharing transportation such as ride-share vans or shuttle vehicles, car-pools, and public transportation

  - Frequent contact with fellow workers in community settings in areas where there is ongoing community transmission.

COVID-19 response measures are focused on controls to lesson impact on workers. Employers should also validate that processing changes don't impact controls established for food safety and food defense. An overview of the controls outlined for meat and poultry process operations in the CDC/OSHA Interim Guidance are provided below:

Worker infection prevention recommendations are based on an approach known as the hierarchy of controls. This groups actions by their effectiveness in reducing or removing hazards. In most cases, the preferred approach is to eliminate a hazard or process: install engineering controls and implement appropriate cleaning, sanitation, and disinfection practices to reduce exposure or shield workers. Administrative controls are also an important part of prevention actions.
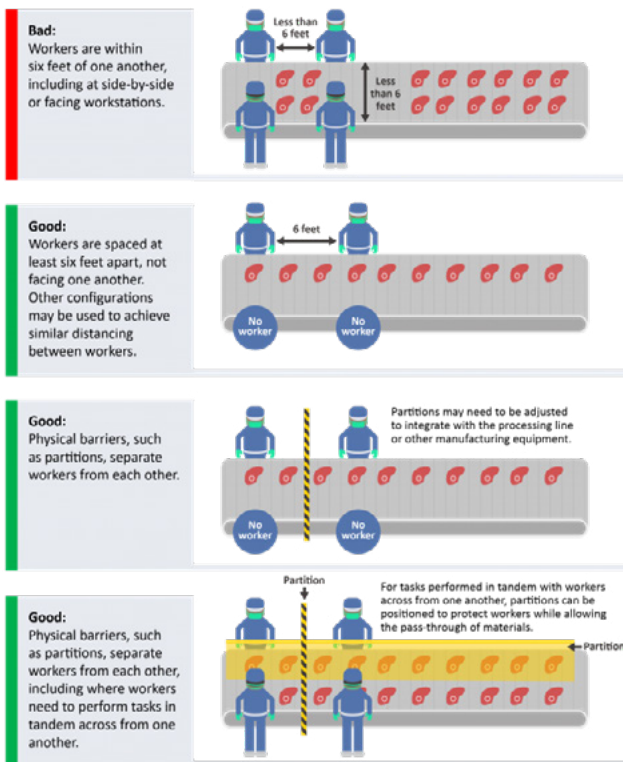
Key actions for Meat and Poultry Processing Operations:

• Create a COVID-19 Assessment and Control Plan with a qualified workplace coordinator assigned to manage the COVID-19 plan. The control plan elements should include, among others:

  - Communication to the workers on how to contact the coordinator with concerns on COVID-19.

  - Infection control and occupational safety and health plans should apply to anyone entering or working in the plant (e.g., all facility workers, contractors, and others).

  - Facility management should reach out to state and/or local public health officials and occupational safety and health professionals and establish ongoing communications to make sure they are getting relevant and up-to-date information concerning COVID-19.

  - The workplace coordinators and management should also be aware of, and follow, all applicable federal regulations and public health agency guidelines.

  - Worksite assessments to identify COVID-19 risks and prevention strategies should be done periodically as part of sound occupational health and public health practice. As part of these assessments, facilities should consider the appropriate role for testing and workplace contact tracing (identifying person-to-person spread) of COVID-19-positive workers in a worksite risk assessment, following available CDC guidance.

- Engineering Controls
  - Add time clocks to reduce congestion and touch-free methods for use.
  - Place handwashing stations or hand sanitizers in multiple locations to reduce crowding (preference for touch-free stations).
  - Evaluate ventilation in work areas to ensure ventilation is adequate to help minimize airborne exposure and minimize air blowing from fans blowing from one worker to another.
  - Provide screening equipment/area at primary entrance to plant. Design of screening area needs to allow for social distancing.
  - Configure work environments to allow social distancing (workers spaced at least six feet apart) through use of partitions or realign work stations or realign workstations to allow partitions to separate workers. The graphic created by CDC/OSHA demonstrates layout options for processing line:

How to Align Meatpacking and Meat Processing Workstations, If Feasible

Bad: Workers are within six feet of one another, including at side-by-side or facing workstations.

Good: Workers are spaced at least six feet apart, not facing one another. Other configurations may be used to achieve similar distancing between workers.

Good: Physical barriers, such as partitions, separate workers from each other.

Good: Physical barriers, such as partitions, separate workers from each other, including where workers need to perform tasks in tandem across from one another.

- Administrative Controls
  - Screening of workers for COVID-19: establish screening methods in consultation with state and local health officials and occupational medicine professionals. Surveillance should include:
    › Screen prior to entry into the facility.
    › Provide verbal screening in appropriate language(s) to determine whether workers have had a fever, felt feverish, or had chills, coughing, or difficulty breathing in the past 24 hours.
    › Check temperatures of workers at the start of each shift to identify anyone with a fever of 100.4°F or greater (or reported feelings of feverishness). Ensure that screeners:
      • Are trained to use temperature monitors and monitors are accurate under conditions of use (such as cold temperatures); and
      • wear appropriate PPE.
    › Do not let employees enter the workplace if they have a fever of 100.4°F or greater (or reported feelings of feverishness), or if screening results indicate that the worker is suspected of having COVID-19.
  - Increase separation at time clocks, break rooms, locker rooms, or other areas commonly frequented. This may require staggering of shifts, breaks, or alternative areas for breaks.
  - Stagger workers' arrival and departure to limit congregations of workers at plant access points and parking lots.
  - Identify staff to monitor social distancing on production lines and in common areas.
  - Provide signs and visual cues as reminders on social distancing.
  - Where possible, limit carpooling and where this is required – limit number of people in vehicle, use hand hygiene before entering vehicle/arriving at destination.
  - Encourage use of cloth masks in the workplace and for shared rides.
  - Cloth masks could present additional safety hazards –
    › Employers should consider additional hazards created by poorly fitting PPE/PHE (personal protective/hygiene equipment) (e.g., mask ties that dangle or catch, equipment that is loose and requires frequent adjustment or tends to fall off) with respect to the work environment (e.g., machinery in which equipment could get caught).

> › Clean/disinfect commonly touched surfaces after each shared ride (door handles, seatbelt buckles, handrails).
>
> › Evaluate alternative schedules and cohorting (grouping together) workers to assign groups of workers assigned to same shifts. This helps minimize the number of different individuals a worker is exposed to.
>
> › Establish system for employees to provide notification of signs/symptoms of COVID-19 or recent close contact with suspected or confirmed COVID-19 case.

• Communication and Training

- Provide training about COVID-19 signs/symptoms and ways to prevent exposure.

- Ensure communication and training materials are easy to understand and translated into languages spoken or read by workers.

- Include pictograms to improve non-verbal communication with workers whose primary language is not English. Do not limit written communications to English only, translate written materials into primary languages and identify translators for reaching out to workers that don't have readily available translations.

- Use videos or in-person demonstrations of required PPE (personal protective equipment) donning and doffing procedures to limit contamination, and monitor PPE for loose fit/straps that can create hazards in the workplace. Document Hazard Assessments and Training for required PPE via Certificate issuance per OSHA.

Additional topics covered by the Interim Guidance and include:

• Cleaning and disinfection in meat and poultry processing

• Screening and monitoring workers

• Managing sick workers

• Resumption of workers back into workplace

• PPE or PHE including cloth face coverings

Aon recommends that employers review the guidance materials available from the CDC and OSHA. Also, reach out to state and local health officials to address specific regulations and assistance available for exposure identification within communities.

Create your COVID-19 Assessment and Control Plan. Next communicate control measures implemented during the plant closure with your workforce to demonstrate support for employee wellbeing. Enforce proper use of face coverings and hand hygiene.

Aon's Food Agribusiness, & Beverage (FAB) team is available to assist our meat and poultry processing clients with COVID Assessment Control Plan review, Food Safety Defense Assessment, and safety policy/procedure development.

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