



AUSTRALIAN
**FOOD &
GROCERY**
COUNCIL

AFGC REPORT

PRINCIPLES FOR RISK MANAGEMENT OF COVID-19
INFECTION WITHIN MANUFACTURING SITES

6 April 2020 – Version 1.1

Sustaining Australia

The AFGC has prepared this document reflecting information available at the time (6 April 2020).

The AFGC offers the following *general* information for consideration by member companies and wider industry. In doing so, it acknowledges the contributions of regulators and AFGC Members. Further inputs from readers are welcome for consideration. Please **contact the AFGC** with comments.

Please note that this is not definitive guidance and manufacturers need to make their own risk assessment and management plans. All companies should consider their own individual circumstance and seek specific advice where necessary. Members are urged to contact their relevant state-based agency for specific questions (please see **Contacts** below).

The AFGC will endeavour to keep Members informed of any changes but can provide no guarantee nor take responsibility for any impact or implication flowing from the use of this document by member companies or any other organisation or individual. This document will be updated as further information emerges; please check the **AFGC website** regularly for later editions.

INTRODUCTION

Australia's food and grocery manufacturing sector – including the whole food and grocery supply chain from the inputs that go into making the products, to the workers on the factory floor, to packaging manufacturers, maintenance providers and logistics networks – is an essential service. All components, inputs and services to keep the sector functioning to provide consumers with what they need is vital. Assurances have been provided by the Prime Minister and Agriculture Minister David Littleproud that the sector is essential and must continue to operate and this should provide business with confidence and reassurance to continue production in this time of uncertainty.

It is important that as an essential service, food and grocery manufacturers take necessary measures to mitigate the impact of COVID-19 outbreak on their workforce, to maintain production and the supply of goods. This will be achieved by:

1. limiting as much as possible the exposure to the COVID-19 virus in the workplace,
2. minimising possible transmission within the workforce, and
3. conducting an appropriate risk assessment to determine what actions must be taken should a workforce member contract the virus infection or be exposed to it.

By developing and implementing an appropriate plan, and with good record keeping, companies can protect businesses by reducing the likelihood of COVID-19 transmission to their workforce and avoid significant interruptions to production should it occur.

Businesses with manufacturing facilities in New Zealand are advised that country-specific requirements apply. Please visit the NZ Ministry for Primary Industries (MPI) [website](#) for more information and contact the MPI as directed in **Contacts** below.

RISK ASSESSMENT AND MINIMISATION

Site Access by Essential Workers and Visitors

The COVID-19 virus may be transmitted to the workforce through visits to company sites. Transmission minimisation measures include the following:

- Restrict site access to essential workers and service providers only.
- Reduce frequency and duration of site access where possible.
- Health screening of all site workers and visitors e.g. questions on current health status as well as any recent travel or close contact with ill persons, consider body temperature checks prior to site access (if thermometers are available).
- If any essential worker or visitor reports symptoms of illness at entry or during site access, request that they leave the site immediately, seek medical advice and report outcome to site management.
- Workers or visitors returning from any illness to be cleared by a medical practitioner as “fit for work”. Please see **Returning Workers** below for further information.
- Keep records of all site access by workers and visitors.

Eliminating and Minimising Close Contact

Person to person transmission is facilitated by close sustained contact.

- A close contact is defined by the [NSW Food Authority](#) (based on a broader definition from [NSW Health](#)) as:

Anyone who has been **within 1.5 metres of the infected employee for a cumulative period of at least 2 hours** at any time in the 24 hours prior to that employee first experiencing symptoms and/or an employee who has had **face-to-face contact for a period of 15 minutes or more**. This type of contact may also occur in a lunchroom, small kitchen space or other environment (separate to a production room floor, for example)

This applies to *all site locations* e.g. processing and storage areas, warehouses, change rooms, washrooms, canteens/kitchens and offices.

- Contact outside of the above is considered *casual* contact (and *currently*, does not result in quarantine).
- If an employee is diagnosed with COVID-19, close contacts of this employee (as defined above) will be required to self-isolate for a period of 14 days while monitoring their health.

- For the dual purpose of protecting worker health and retaining operators for continuity of production, manufacturers should map their sites to identify areas at risk of close contact occurring and seek to eliminate these wherever possible and to otherwise minimise them.
- Where close contact cannot be eliminated e.g. in small, closed spaces (a *closed space* is an area within a building with contiguous floor, walls, doors and ceiling such as an office, meeting room or laboratory, where **a minimum space requirement of 4 m² per person applies**), manufacturers should keep and retain detailed records of close contact. Those workers or visitors in close contact are advised to use Personal Protection Equipment (PPE) such as clothing, gloves and eye shields and to log any PPE fails. Note the use of N95 respirators or equivalent by non-healthcare workers is not recommended unless an on-site worker has been confirmed as infected or is displaying symptoms of respiratory disease (as they immediately exit the site). For more information on appropriate use of masks, please see the Commonwealth Department of Health's [information on the use of surgical masks](#) (in New Zealand, [guidance](#) from the Ministry of Health).
- Further note on PPE, where this is required for other purposes (outside of COVID-19 risk management), use should continue “as usual”.
- Measures to reduce close contact include:
 - Separate entry and exit points for different shifts at shift changeover
 - If separate entry/exit is not possible, stagger end-of-shift and beginning-of-the-next (production pause)
 - Separate production operators into smaller teams and restrict movement of these teams to specified areas only
 - Give extra consideration to risks associated with maintenance staff that work across different production areas and/or the use common tools in different factory locations
 - Limit use of hand-washing basins and toilets in close proximity to one person at a time or every second or third station (depending on the distance and barriers between)
 - Marking worker positions/placements e.g. taping or stickering on the factory floor
 - Reducing the number of seats in canteens or in other eating areas to assist meeting the distancing requirement

Noting that many of the above are situation-specific and may not be relevant for individual manufacturers.

Hygiene and Sanitation/Disinfection

Good hygienic practices are critical to minimising transmission of the virus.

- For food manufacturing facilities, [FSANZ](#) advises that existing cleaning systems (which support compliance with [Standard 3.2.2](#) of the Food Standards Code) should continue as normal but additional cleaning and sanitising of *all* food contact surfaces is recommended.

- Increase the frequency of cleaning and sanitising of frequently-touched surfaces such as door handles, light switches, trolley jacks, work benches, equipment and other surfaces identified by the business.
- In staff kitchens and canteens, all eating and drinking utensils and food contact surfaces must be clean and sanitised before use.
- For sanitising, the current advice is that the coronavirus is destroyed by hot water (e.g. by dishwashers operating above 60°C), or by commercial sanitisers normally used (e.g. sodium hypochlorite, hydrogen peroxide, quaternary ammonium compounds and 70% or greater ethanol). No change in concentration or exposure times is needed but the guidance documents referred to below give concentrations required for bleach. Otherwise, follow commercial sanitiser manufacturers' instructions.
- **Current evidence** indicates that food is not a likely source or route of virus transmission. However, where ready-to-eat foods are handled, routine use of disposable gloves is recommended (“business as usual”). In the case of food products which are heat processed (above 60°C), it is expected any food surface contamination by the virus would be eliminated.

For more detailed cleaning advice, please refer to the following resources:

- [FSANZ Cleaning and Sanitising Fact Sheet](#)
- [The Commonwealth Department of Health’s Environment and Disinfection Principles for COVID-19](#) (this includes health care settings which is *not* directly relevant for manufacturers)
- WA Health’s [COVID-19 Environmental Cleaning for Workplaces \(Non-Healthcare Settings\)](#)
- The [Codex General Principles of Food Hygiene](#)

COMPLIANCE

Compliance with a company’s risk management approach is equally as important as its development. All workers and visitors need to be formally briefed and trained to follow the risk reduction approach wherever possible. Manufacturers might consider developing tailored communications appropriate to process workers (e.g. fact sheets, posters).

Further, team leaders and other management should monitor overall facilities and workers closely to answer any queries and support compliance with the agreed approach.

It should be noted, however, that in an emergency (e.g. where a worker is injured or becomes seriously ill), that another worker is able to render assistance. Compliance with distancing requirements is secondary to an immediate and serious threat to worker wellbeing.

It is also suggested that a business conducts a *mock exercise* to trial their planned response as this will help identify any potential operational challenges that may not have been realised.

RESPONSE TO COVID-19 DIAGNOSIS IN WORKERS OR VISITORS

Safe Work Australia has provided the following infographic to guide the immediate response of employers and visitor hosts:

swa.gov.au/coronavirus

Suspected or confirmed case of COVID-19 at work

If the suspected or confirmed case of COVID-19 is at work

 1. ISOLATE Isolate the person from others and provide a disposable surgical mask, if available, for the person to wear.	 2. INFORM Ring the national COVID-19 hotline (1800 020 080). Follow the advice of health officials.	 3. TRANSPORT Ensure the person has transport to their home or to a medical facility.	 4. CLEAN Clean the area where the person was working and all places they have been. This may mean evacuating those areas. Use PPE when cleaning.
 5. IDENTIFY Identify who at the workplace had close contact with the infected person in the 24 hours before that infected person started showing symptoms. Send those people home to isolate. Allow employees to raise concerns.	 6. CLEAN Clean the area where the close contact people were working and all common areas they have been. This may mean evacuating those areas. Use PPE when cleaning.	 7. REVIEW Review risk management controls relating to COVID-19 and review whether work may need to change. Keep employees up to date on what is happening.	

If the suspected or confirmed case of COVID-19 is not at work when diagnosed

 1. INFORM Ring the national COVID-19 hotline (1800 020 080). Follow advice of health officials.	 2. IDENTIFY Identify who at the workplace had close contact with the infected person in the 24 hours before that infected person started showing symptoms. Send those people home to isolate. Allow employees to raise concerns.	 3. CLEAN Clean the area where the infected person and their close contacts were working and all common areas they have been. This may mean evacuating those areas. Use PPE when cleaning.	 4. REVIEW Review risk management controls relating to COVID-19 and review whether work may need to change. Keep employees up to date on what is happening.
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Remember:

- > Workers assisting the person who has suspected or confirmed with COVID-19 should be provided with appropriate PPE, if available, such as gloves and a mask. They should also follow hand hygiene procedures.
- > Be aware of privacy obligations.
- > Follow the advice of health officials at all times.



Following a confirmed diagnosis of a worker with COVID-19, the diagnosing medical practitioner will notify the relevant state health department. The department will trace contacts of the patient and, if the patient has been recently employed within food manufacturing, it may contact the relevant food enforcement agency. The exact response will vary between states and is dependent on the resources available at the time.

For example, in NSW, the NSW Food Authority is likely to be engaged to contact the food business and conduct an investigation before reporting back to NSW Health, which will then make a decision as to which contacts are removed from work and isolated. In Victoria, it's more likely an environmental health officer (EHO) from the local council will investigate. In Queensland, it is expected the public health unit will be responsible for engaging the food business. At time of writing, the AFGC is still seeking indications of responses in other jurisdictions but it's clear that responses are led by public health units specialising in communicable diseases rather than food authorities.

The importance of a COVID-19 risk mitigation plan

As food and grocery manufacture is an essential service, it is expected that the objective of the investigating health authorities will be to contain disease transmission with minimal disruption to food manufacturing. However, this will only be possible if the food manufacturer is able to demonstrate its risk management, disinfection procedures and trace contacts that worker/visitor has had close contact with. In the absence of such information being provided quickly, health authorities may direct the manufacturer to temporarily close it operations. The manufacturer is legally obliged to follow any directives issued by the health authority.

If a manufacturer becomes aware of the confirmed diagnosis of a worker or visitor ahead of contact from the health authorities, it is strongly recommended the manufacturer:

- Disinfects all site areas the worker or visitor has been within.
- Removes from the site any other worker who has had close contact with the diagnosed worker. Close contacts are required to isolate themselves at home and monitor their health carefully for 14 days after they were last exposed to the infectious person.
- Contact the health department for further advice (refer **Contacts**).

Contingent Work Force

It is recognised that processing operators are skilled workers and not able to be quickly replaced due to significant training requirements. Consideration needs to be given to how a manufacturer might replace operators who are absent due to illness or self-isolation. Other workers within the business (e.g. research and development, quality and processing engineering teams), could be trained in preparation. Businesses could also reach out to employment agencies specialising in the recruitment of manufacturing workers to explore options.

Returning Workers

Workers who have been isolated following close contact with a person diagnosed with COVID-19 may be referred for COVID-19 testing (if symptomatic). This testing may return a negative result but they are required to continue their 14 day self-isolation until its completion.

Workers diagnosed with COVID-19 may be recovered and seeking to return to work. In both cases, and in line with the information contained in **Site Access by Essential Workers and Visitors**, returning workers should be confirmed as “fit for return to work” by a medical practitioner and certification provided to their employers.

When visitors (non-employees) seek access to the site, questions regarding the health status of the intended visitor should include recent history of illness and clearance for work.

CONTACTS FOR MANUFACTURERS

Food Enforcement Agencies (including NZ MPI)

Work Health and Safety Contacts (especially relevant for non-food manufacturers)

State Health Departments

NSW: 1800 022 222 or 1300 066 055 (be ready to provide a location)

ACT: 1800 022 222 or (02) 6205 2155

Vic: 1300 651 160 or 1800 675 398

Qld: 13 43 25 84

SA: 1800 253 787 or (08) 8226 6000

WA: 1300 62 32 92 or 1800 020 080

NT: 1800 020 080 or (08) 8922 8044

Tas: 1800 671 738

NZ: 0800 358 5453

It is also suggested that your local council environmental health officer (EHO) might assist in some circumstances.

ADDITIONAL RESOURCES

- [FSANZ Novel Coronavirus and Food Safety](#)
- [NSW Food Authority Food businesses and COVID-19](#)
- [Victoria Health Advice for food businesses on Coronavirus disease \(COVID-19\)](#)
- [Safe Food Queensland COVID-19 Advice for Food Businesses](#)
- [New Zealand Ministry for Primary Industries COVID-19 and food safety](#)
- [Commonwealth Department of Agriculture, Water and the Environment Imported Food Notice](#)
- [Safework Australia COVID-19 Information for Workplaces](#)
- [US FDA Food Safety and the Coronavirus Disease 2019 \(COVID-19\)](#)
- [Dairy Industry COVID-19 \(Novel Coronavirus\) Directory](#)
- [The USA Food Industry \(FMI\) Coronavirus Resources](#)