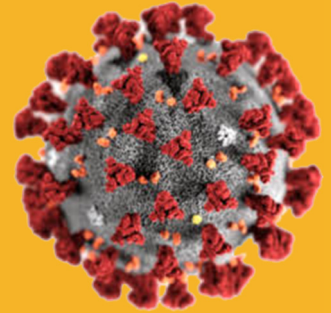




TEAMSTERS SAFETY & HEALTH COVID-19 Guidance



Health and Safety Guidance for Preventing Exposure in Meat and Poultry Processing Coronavirus (COVID-19, SARS-CoV-2)

(May 28, 2020)

This fact sheet presents recognized health and safety measures aimed at reducing the risk of becoming exposed to the SARS-CoV-2 virus that causes COVID-19 among meat and poultry processing workers. The fact sheet is largely, but not entirely, based on the [Interim Guidance on Meat and Poultry Processing Workers and Employers](#)¹, issued by the Centers for Disease Control and Prevention and the Occupational Safety and Health Administration (OSHA) on April 26, 2020, but it also exceeds current federal, state, and local safety and health regulations or recommendations.

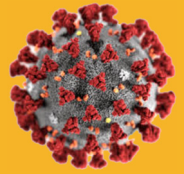
Multiple outbreaks of COVID-19 among meat and poultry processing workers have occurred in the United States recently, resulting in thousands of exposed and sick workers and multiple plant closures. On April 28, 2020, President Trump signed an [executive order](#)² that classifies meat and poultry production as [critical infrastructure in the food supply chain](#) and its workers as essential workers. The order requires that meat and poultry processors continue operations consistent with the [Interim Guidance on Meat and Poultry Processing Workers and Employers](#) for their operations jointly issued by OSHA and by the CDC.

If an employer determines that certain measures in the Guidance are not feasible in the context of specific plants and circumstances, OSHA states that it “will take into account good faith attempts to follow the Joint Meat Processing Guidance.”³

¹ <https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/meat-poultry-processing-workers-employers.html>

² <https://www.whitehouse.gov/presidential-actions/executive-order-delegating-authority-dpa-respect-food-supply-chain-resources-national-emergency-caused-outbreak-covid-19/>

³ <https://www.osha.gov/memos/2020-04-16/discretion-enforcement-when-considering-employers-good-faith-efforts-during>



Exposure Risks to Meat and Poultry Processing Workers

Workers involved in meat and poultry processing can be exposed to the virus that causes the Coronavirus disease (COVID-19), a respiratory illness caused by a new virus called SARS-CoV-2, when they contract the virus exhaled by an infected person. The contact can be through directly breathing contaminated air or picking up the virus by touching a spot where the virus settled and then touching their face, mouth, nose, or eyes. The risk of exposure is greatest where workers are in close quarters with other workers. Workers are not exposed through meat or poultry products they handle. At the time of this writing, there is no vaccine or effective treatment for infections other than supportive treatment.

Exposure Risk Factors

- **Sharing breathing air** – When infected workers in the plant cough, sneeze, talk, or breathe, they release the virus in their breath. When other workers breathe that air, they can be infected also.
- **Distance between workers** – Meat and poultry processing workers often work close to one another on processing lines. The closer they are, the more they share the air. 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 exposure** – Long periods of close contact increases the chance of infection with the virus. Meat and poultry processing workers are often close to other workers for most of their shift. Long shifts cause more exposure and more chance of infection.
- **Touching contaminated surfaces** – Exposure can also occur from touching contaminated surfaces, such as tools, equipment, door handles, and break room furniture.
- **Other work-related exposures** - Outside of the immediate work area, shared spaces such as break rooms, locker rooms, and entrances/exits to the facility may contribute to their risk. Outside of work shared transportation such as shuttle vehicles, car-pools, and buses can be sources of exposure.

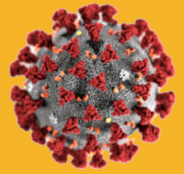
Criteria for Continuing Operations

CDC's *Critical Infrastructure Guidance*⁴ advises that essential/critical infrastructure workers may be permitted to continue work following potential exposure to COVID-19, as long as they remain without symptoms (asymptomatic) **and** additional precautions are implemented to protect them and the community. All meat and poultry processing facilities developing plans for continuing operations where COVID-19 is occurring among workers or in the surrounding community should:

1. Work directly with appropriate state and local public health officials and with authorized employee representatives;
2. Incorporate relevant aspects of CDC guidance, including but not limited to this document and the CDC's [Critical Infrastructure Guidance](https://www.cdc.gov/coronavirus/2019-ncov/community/critical-workers/implementing-safety-practices.html)⁵; and

⁴ <https://www.cdc.gov/coronavirus/2019-ncov/community/critical-workers/implementing-safety-practices.html>

⁵ <https://www.cdc.gov/coronavirus/2019-ncov/community/critical-workers/implementing-safety-practices.html>



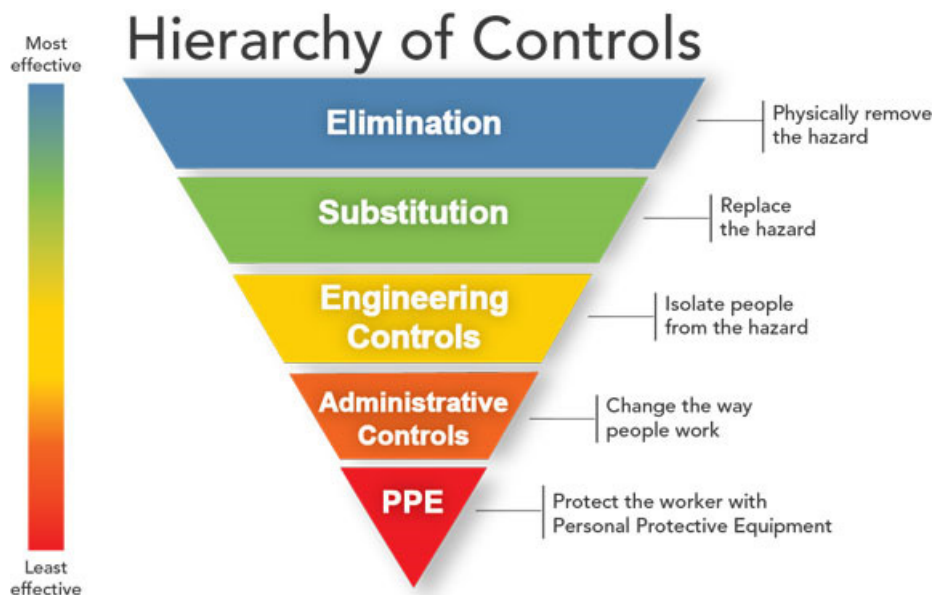
3. Incorporate guidance from other authoritative sources or regulatory bodies, such as the Occupational Safety and Health Administration (OSHA), and the Food Safety and Inspection Service (FSIS), as needed.

COVID-19 Assessment and Control Plan⁶

Exposure Controls

Employers should adopt infection control strategies based on a comprehensive worksite hazard assessment, following the hierarchy of controls, which are a widely recognized strategy that ranks control methods based on how effective they are in reducing or removing hazards. These controls include using appropriate combinations of the following measures in order from most protective to least protective: **Hazard Elimination, Engineering Controls, Administrative Controls (Training and education, Safe work practices), and Personal Protective Equipment (PPE).**

(For details, refer to OSHA document, Guidance on *Preparing Workplaces for COVID-19*⁷).

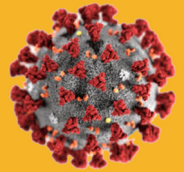


The Centers for Disease Control and Prevention (CDC)⁸

⁶ <https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/meat-poultry-processing-workers-employers.html>

⁷ <https://www.osha.gov/Publications/OSHA3990.pdf>

⁸ Hierarchy of Controls, CDC, <https://www.cdc.gov/niosh/topics/hierarchy/default.html>



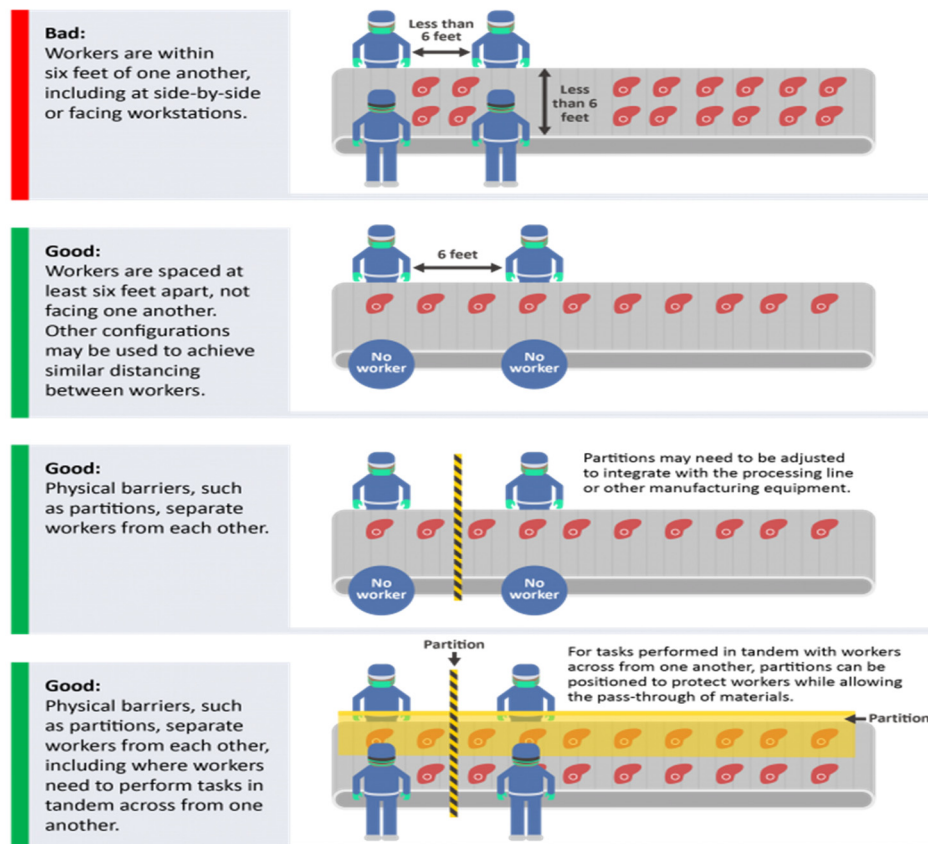
Hazard Elimination

Employers should develop and implement a comprehensive screening and monitoring program aimed at preventing the introduction of COVID-19 into the worksite. This program should include screening workers before entering the workplace, criteria for return to work of exposed and recovered (those who have had signs or symptoms of COVID-19 but have gotten better), and criteria for excluding sick workers. Unfortunately, many people are infectious before they start showing symptoms, so screening is not 100% effective. Screening must be consistent and be coordinated to the extent possible with local public health authorities and with authorized employee representatives. For details, refer to the joint CDC-OSHA *Interim Guidance on Meat and Poultry Processing Workers and Employers*.

Engineering Controls

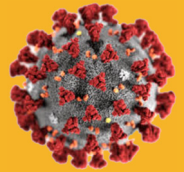
- Because it is known that SARS-CoV-2 can spread by those with no symptoms (asymptomatic), work environments should be set up so that workers are kept at least six feet apart. This may require changes in production practices to maintain appropriate distances among workers.

How to Align Meatpacking and Meat Processing Workstations, If Feasible



Modified from *Interim Guidance on Meat and Poultry Processing Workers and Employers*⁹

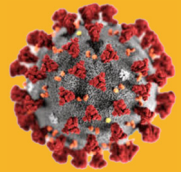
⁹*Interim Guidance on Meat and Poultry Processing Workers and Employers*



- **Modify the alignment of workstations**, including along processing lines, so workers are at least six feet apart in all directions. Workers should not work directly facing each other.
- **Use markings and signs** to remind workers to maintain their location at their station away from each other and practice social distancing on breaks.
- **Use physical barriers**, such as strip curtains, clear plastic or similar materials, or other impermeable dividers or partitions, to separate meat and poultry processing workers from each other. Make sure they are placed and are large enough, so the workers always have the barrier between them.
- **Barriers help to stop** the spread of potentially infectious respiratory droplets when implemented as part of the hierarchy of controls. Barriers are a possible engineering control and can be used in conjunction with administrative controls (like masks for source control) and PPE to protect workers.

If partitions may not be feasible in some parts of a plant, and management should adapt the hierarchy of controls to their particular work settings, meaning that in slaughter operations or where workers in tandem lift hogs, for example, onto hooks, employers might need to equip the workers with face shields instead of a physical barrier. The goal is to prevent the spread of the respiratory droplets, so various combinations of controls can achieve the same outcome.

- **Ensure adequate ventilation in work areas:** Facilities should consult with a ventilation engineer to help minimize workers' potential exposures. Facilities should have at least six outside air changes per hour. Use 16 MERV or HEPA (even better) filters to filter any recirculated air. Have a thorough engineering study done to check that the ventilation system is working properly.
- **Minimize air from fans blowing from one worker directly to another worker.** Fans should not blow horizontally. If fans are removed, employers should remain aware of, and take steps to prevent heat hazards.
- **Place handwashing stations or hand sanitizers** with at least 60% alcohol in multiple locations to encourage hand hygiene. If possible, choose hand sanitizer stations that are touch-free.
- **Add additional clock in/out stations**, if possible, that are spaced apart, to reduce crowding in these areas. Use as touch-free methods or staggering times for workers to clock in/out when possible.
- **Remove or rearrange chairs and tables**, or add partitions to tables, in break rooms and other areas workers may frequent to increase worker separation. Identify alternative areas to accommodate overflow volumes such as training and conference rooms or using outside tents for break and lunch areas.

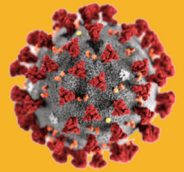


Administrative Controls

- **Encourage single-file movement** with a six-foot distance between each worker through the facility, where possible.
- **Monitor** distancing on processing floor lines.
- **Stagger break times** and provide temporary break areas and restrooms to avoid groups of workers during breaks. Workers should always maintain at least six feet of distance from others, including on breaks.
- **Stagger workers' arrival and departure times** to avoid gatherings of workers in parking areas, locker rooms, and near time clocks.
- **Clean and disinfect** commonly touched surfaces, including frequently touched surfaces, tools, and equipment, using disinfectants registered with the Environmental Protection Agency (EPA) that are effective against SARS-CoV-2 (See EPA website [List N¹⁰](#)). Workers who perform cleaning and disinfection tasks would need additional protections from chemical hazards. Note: Employers must ensure their written hazard communication program (29 CFR 1910.1200) and training is up to date for all employees.
- **Require masks.** Masks reduce the amount of virus getting into the room air from an infected person. When the wearer breathes/coughs/sneezes directly into the mask it can catch and hold the wet virus particles. Cloth masks and surgical masks are about equally effective at catching coughs and sneezes. Since many people are infected without knowing it, everyone should wear a mask. Unless the mask is a particulate respirator approved by the National Institute for Occupational Safety and Health (NIOSH), it does not protect the wearer. (See PPE section below for more information on masks.)
- **Provide floor markings or signs** as a reminder to workers to maintain social distancing.
- **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 employees to **maintain social distancing** as much as possible.
 - Encourage employees 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.
 - Workers should [cough and sneeze](#) into their elbows or a tissue.
 - **Modify the alignment of processing or production lines** and stagger workers across shifts to minimize exposure to the coronavirus.

¹⁰ List N: Disinfectants for Use Against SARS-CoV-2

<https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2>

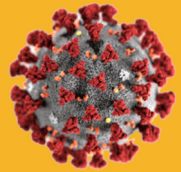


- For example, a plant that normally operates on one daytime shift may be able to split workers into two shifts throughout 24 hours.
- **Review leave and incentivize policies:**
 - Modify sick leave policies to make sure that ill workers are not in the workplace. Make sure that employees understand these policies.
 - Change any incentive programs so that employees are not penalized for taking sick leave.
 - Allow employees to donate sick leave to others and give advances on future sick leave.
- **Group together (cohort)** workers so that groups of workers are always assigned to the same shifts with the same coworkers to reduce the spread of workplace SARS-CoV-2 transmission by minimizing the number of different individuals who come into close contact with each other over a week. Wherever possible, implement cohorting of small, consistent teams to minimize the number of potential exposures for each person. Cohorting will also simplify the identification process of possible exposed workers if a case of COVID-19 is confirmed.
- **Encourage workers to tell their supervisors** if they are getting sick or had close contact with someone who is sick.
- **Provide regular, frequent access to soap, clean running water,** and paper towels for handwashing.
 - **Place no-touch hand sanitizer dispensers throughout the workplace.**
 - **Provide tissues and no-touch trash receptacles for workers to use.**
- **Workers should be educated to avoid touching their faces**, including their eyes, noses, and mouths, particularly until after they have thoroughly washed their hands upon completing work and/or removing personal protective equipment (PPE). Using cigarettes and smokeless tobacco make people touch their faces.

The CDC recommends wearing cloth face coverings as a protective measure, in addition to social distancing (i.e., staying at least 6 feet away from others) and to comply with state and local requirements for their use. Cloth face coverings are intended to protect the people *around the user* by catching coughs and sneezes. They may be helpful in the following ways:

- When social distancing is not possible or technically feasible based on working conditions;
- By reducing the amount of large respiratory droplets that a person spreads when talking, sneezing, or coughing;
- By preventing people who do not know they have the virus that causes COVID-19 from spreading it to others.

Cloth face coverings, as well as surgical masks, are not PPE and are not appropriate substitutes for PPE such as respirators (like N95 respirators) or medical facemask (surgical mask) because they do not have effective filters for particles the size of viruses and do not seal to the users face like a respirator, so they allow air to leak around them. Employers must comply with OSHA's Respiratory Protection Standard whenever respirators are used in the workplace.



The respirator standard requires a written program medical exams, fit testing, and training. Employers who determine that cloth face coverings should be worn in the workplace should ensure that they meet criteria involving fit, material, breathability, dryness, and sanitation. (For details, refer to the joint CDC-OSHA [Interim Guidance on Meat and Poultry Processing Workers and Employers](#)).

Education and Training

All communication and training about infection control should be effective in practice and contain information about:

- Signs and symptoms of COVID-19, how it spreads, risks for workplace exposures;
- The employer's infection control plan;
- How workers can protect themselves;
- Proper handwashing and hand sanitizer use;
- Cough and sneeze etiquette;
- How to put on, take off, and maintain PPE and cloth face coverings (non-PPE);
- The employer's sick leave policy;
- Social distancing measures.

Personal protective equipment (PPE)

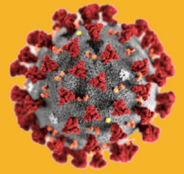
OSHA's PPE standards¹¹ (29 CFR 1910.132-138) require employers to conduct a hazard assessment¹², documented in writing, to determine if hazards are present, or are likely to be present, for which workers need PPE. The results of that assessment will be the basis of workplace controls (including PPE) needed to protect workers. Specifically, when engineering and administrative controls are difficult to maintain and there may be exposure to other workplace hazards, such as splashes or sprays of liquids on processing lines or disinfectants used for facility cleaning, PPE should be considered.

When using PPE instead of more effective control measures employers must:

- Select and provide appropriate PPE at no charge to employees.
- Train workers on how to use PPE. Use videos or in-person visual demonstrations of proper PPE donning and doffing procedures. (Maintain social distancing during these demonstrations.)
- Emphasize that care must be taken when putting on and taking off PPE to ensure that the worker or the item does not become contaminated.
- Provide PPE that is either disposable (preferred) or, if reusable, ensure it is properly disinfected and stored in a clean location when not in use.

¹¹ COVID-19, OSHA Standards <https://www.osha.gov/SLTC/covid-19/standards.html>

¹² The employer shall verify that the required workplace hazard assessment has been performed through a written certification that identifies the workplace evaluated; the person certifying that the evaluation has been performed; the date(s) of the hazard assessment; and, which identifies the document as a certification of hazard assessment. <https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.132>.



- PPE worn at the facility should not be taken home or shared.

Face shields may protect the wearer and workers around them.

- If helmets are being used, use face shields designed to attach to helmets.
- Face shields can provide additional protection from both potential process-related splashes and potential droplets spread from person-to-person.
 - Safety glasses may fog up when used in combination with masks or cloth face coverings.
 - Only some face shields are acceptable substitutions for eye protection (such as safety glasses) that are used for impact protection; facilities should consult with occupational safety and health professional concerning the use of face shields.
- Face shields can help minimize contamination of masks and cloth face coverings.
- If used, face shields should be cleaned and decontaminated after each shift, and when not in use they should be kept in a clean location at the work facility.
- If used, face shields should also wrap around the sides of the wearer's face and extend to below the chin.

During the COVID-19 pandemic, meat and poultry processing employers should allow workers to use **respirators**, such as an N95, if available, even if respirators are not normally required. If workers use a respirator with an exhalation valve, have them wear a cloth or surgical mask to cover the valve. The mask over the exhalation valve does not have to have a tight seal. Replace all masks when they get wet or dirty.

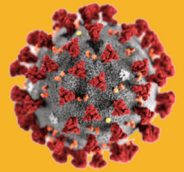
In addition to the PPE noted above, plant workers may need to use **gloves, face, and eye protection**, and other types of PPE when cleaning and disinfecting meat and poultry processing plants (including frequently touched surfaces, tools, and equipment).

When PPE is used, employers should put in precautions for the additional hazards created by poorly fitting PPE (e.g., mask ties that dangle or catch; PPE that is loose and requires frequent adjustment or tends to fall off) or by the work environment (e.g., machinery in which PPE could get caught).

Workers' Rights and the Role of the Local Union

From the beginning of the pandemic, OSHA is conducting few site inspections and has relaxed some of its standards. CDC guidance does not always represent the best practices for protecting the safety and health of workers, especially essential workers. Hazard controls must go beyond OSHA regulations and CDC guidance. Now, the local union must play a leadership role in compelling the employer to effectively protect their workers.

The Union can enforce OSHA standards through the grievance process, even if it is not specified in the contract. Despite the labor unions' petition, OSHA has not issued a standard for COVID-19; however, OSHA requires employers, under a general duty, "to provide a safe and healthy workplace free from



recognized hazards “that are causing or are likely to cause death or serious physical harm.”¹³

Under the National Labor Relations Act (NLRA), the Union has a right to bargain over the conditions of work, including hazard controls, testing, work hours, and sick leave. Whenever working conditions change, such as the occurrence of a pandemic, even during the life of a contract, the union has a right to demand bargaining over the change. A demand to bargain should be in writing and delivered to the employer by a union representative.

Local unions should also use customary tactics to pressure the employer, stickers, solidarity meetings, press conferences, etc. Right now, the public is on the workers’ side when they see employers putting them at risk.

OSHA prohibits employers from retaliating against workers for raising concerns about safety and health conditions. Firing, laying off, demoting, denying overtime or promotion, or reducing pay or hours, for engaging in activities protected by OSHA’s whistleblower laws is illegal. Workers only have thirty days after their employer retaliates against them to file their complaint with OSHA. The IBT can help file the complaint.

Under OSHA’s recordkeeping requirements, COVID-19 is a recordable illness, and employers are responsible for recording cases of COVID-19 if several criteria are met. Because of the difficulty with determining work-relatedness¹⁴, to assess employers’ efforts in this regard, OSHA compliance officers should apply the following considerations:

- The reasonableness of the employer’s investigation into work-relatedness.
- The evidence that was available to the employer.
- The evidence that a COVID-19 illness was contracted at work.

If, after exercising reasonable and good faith efforts, “the employer cannot determine whether it is more likely than not that exposure in the workplace played a causal role concerning a particular case of COVID-19, the employer does not need to record that COVID-19 illness. In all events, it is important as a matter of worker health and safety, as well as public health, for an employer to examine COVID-19 cases among workers and respond appropriately to protect workers, regardless of whether a case is ultimately determined to be work-related¹⁵.”

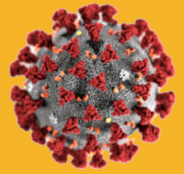
Rights to Information

The union has a right to view any record the employer has related to workplace safety. This includes the OSHA Log which lists all the injuries and illnesses (including COVID-19 infections) that occur on the job including the name of the affected worker. The employer must also provide on request:

¹³ General Duty Clause, OSHA Act of 1970, <https://www.osha.gov/laws-regs/oshact/section5-duties>

¹⁴ <https://www.osha.gov/memos/2020-05-19/revised-enforcement-guidance-recording-cases-coronavirus-disease-2019-covid-19>

¹⁵ <https://www.osha.gov/memos/2020-04-10/enforcement-guidance-recording-cases-coronavirus-disease-2019-covid-19>



- Measurements, such as air monitoring or noise exposure.
- Test results, such as asbestos in floor tiles or lead in paint.
- Inspections, such as fire extinguisher or forklift, and
- Reports, such as safety consultants.

Workers also have a right to their medical records. The union can also get individual medical records with the workers' permission.

INFORMATION AND RESOURCES

Stay informed, talk to your employer, supervisor, and union representative. For concerns, questions, and information, contact the IBT Safety and Health Department at (202) 624-6960 or visit: <https://teamster.org/COVID-19>.

See these sources for more information on worker exposures to COVID-19:

- IBT Safety and Health Department COVID-19 Resource Page: www.teamstersafety.org/covid-19
- OSHA COVID19: <https://www.osha.gov/SLTC/covid-19/>
- OSHA *Guidance on Preparing Workplaces for COVID-19*
<https://www.osha.gov/Publications/OSHA3990.pdf>
- CDC COVID19: www.cdc.gov/coronavirus/2019-ncov/
- CDC *Interim Guidance for Businesses and Employers* www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html
- CDC *Resources for Businesses and Employers: Responding to Coronavirus Disease 2019 (COVID-19), May 2020*
<https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/businesses-employers.html>
- NIOSH Workplace Safety and Health Topic:
www.cdc.gov/niosh/emres/2019_ncov.html