

COVID-19: Frequently Asked Questions for Dairy Processors

Version: March 19, 2020. Please check <https://www.idfa.org/coronavirus> for the most recent version.

The intent of this guidance document is to provide producers, processors, and manufacturers of food with answers to questions about the safe production of food and the health of employees given the current environment where COVID-19 is present. Included are references where additional information by authoritative bodies can be found.

Can COVID-19 be transmitted through the food we produce?

Currently there is no evidence that suggests that COVID-19 is transmitted through food consumption, according to the CDC, FDA, and European Food Safety Agency (EFSA). Experience with other coronaviruses suggests these viruses survive poorly on surfaces, and thus there is a very low risk of spread from food products or packaging that are shipped over a period of days or weeks at ambient, refrigerated, or frozen temperatures.

- [CDC COVID-19 FAQ - How It Spreads](#)
- [FDA Coronavirus Disease 2019 FAQ - Food Products](#)
- [EFSA Statement on Food Transmission](#)

What health and safety procedures should I implement at my facility to ensure the health and safety of my employees and a safe workplace during this COVID-19 pandemic?

When implementing strategies to protect your employees from COVID-19, it is important to comply with local, state and federal privacy, employment and labor laws. You may also have a unionized workforce with a contract that directs how the company interacts with employees. Although not every employer is subject to the Americans with Disabilities Act (ADA), the Equal Employment Opportunity Commission (EEOC) has provided guidance that is valuable to all employers and is intended to complement your ability to follow CDC guidance to protect your workers and workplace. We also recommend that companies work with counsel to ensure compliance with all applicable laws.

Sick Leave Policy

Companies should have a proactive sick leave policy. If an employee show signs of illness (cough, fever, and/or shortness of breath) require them to stay home and, if desired, perform job relevant tasks remotely. Prior to allowing employees to return to work following an illness, be sure they have followed CDC's "[What to Do if You are Sick](#)" guidance. You may ask an employee who calls in sick whether they are experiencing any of the COVID-19 symptoms (fever, chills, cough, shortness of breath, or sore throat). Any information provided by the employee must be maintained as a confidential record. If an employee is exhibiting COVID-19 symptoms, encourage them to seek medical attention.

Screening Employees and Visitors

Companies opting to screen employee body temperature when they report to and leave work may do so, particularly if community spread has been documented. You should notify your employees of this action in advance and inform them that the purpose of temperature screening is solely to protect them

from any employee that may have a symptom of COVID-19 and not to determine if an employee has other illness, impairment or disability. In addition to taking temperatures, employers should consider posing questions of employees to help evaluate employees' exposure risk. Two practical decision tree examples related to temperature taking and exposure assessment are appended to the end of this document for reference. *NOTE: Recent comments from FDA indicate potential shortages in the supplies of infrared thermometers due to greatly increased demand. Companies should consult with their local health departments for advice on taking employee temperatures.*

Taking a person's temperature is considered a medical examination and non-contact thermometers should be used if possible. You should develop a consistent examination process for all employees, protect employees' privacy during the examination, maintain results as confidential medical records, and avoid any potential stigma for employees who may show symptoms or test positive for the virus. Those with elevated temperatures (>100.4 degrees F) should be separated from other employees and they should contact their healthcare providers. For further and more detailed information:

- [EEOC Coronavirus Guidance](#)

It has been reported that asymptomatic individuals can spread COVID-19. It is critical that proper hand and respiratory hygiene practices, as well as social distancing, are followed. Facilities should actively maintain routine, scheduled cleaning and sanitization of both production and non-production areas. High risk areas (restrooms, break rooms, locker rooms, first aid areas, etc.) and surfaces (doorknobs, handrails, telephones, faucets, electronics, etc.) that employees regularly come in contact with, warrant cleaning and disinfection on a regular and frequent schedule.

Non-essential visitations to facilities should be deterred; however, any visitors to company offices and production facilities should be immediately informed upon arrival that you have implemented precautionary procedures for your employees' and all visitors' protection, and that those procedures include asking illness-related questions and allowing or disallowing entrance based on their response. If a visitor answers "yes" to any of the questions in the below scenarios, it is advised that they reschedule their visit or conduct the appointment by phone.

- Will you please allow us to check your temperature using a non-contact thermometer? (If the temperature check is 100.4 degrees F or above, the visitor must leave immediately; if the temperature check is below 100.4 degrees F, proceed with the following questions:)
 - Do you feel ill or have a fever, cough or shortness of breath? If yes, visitor must leave immediately?
 - Have you had a fever, a cough or shortness of breath in the last week? If yes, visitor must leave immediately?
 - Have you encountered anyone with a suspected or known COVID-19 case? If yes, visitor must leave immediately?
 - Have you traveled outside the United States within the last 14 days? If yes, visitor must leave immediately?

Companies may also want to distribute an email or other communication to regular visitors, suppliers, and delivery companies explaining your COVID-19 management policy, noting the above questions, and asking that no persons enter your building unless their visit is "essential."

- [CDC Interim Recommendations for US Community Facilities with Suspected/Confirmed Coronavirus Disease](#)
- [CDC Interim Guidance for Businesses and Employers](#)
- [CDC What to Do If You Are Sick](#)
- [OSHA Guidance](#)
- [FDA Health and Personal Hygiene Handbook](#)

What should be done if an employee tests positive for COVID-19?

If an employee or individual currently working, or recently present, within your facility is confirmed by a laboratory to be positive for COVID-19, **it is recommended that you immediately notify your local health department.** Ensure that all sensitive surfaces and areas are immediately cleaned and disinfected.

FDA advises that if an employee in a food processing facility or farm tests positive for COVID-19, facilities should take the following steps to ensure a safe work environment:

- Inform fellow employees of the possible exposure to COVID-19 in the workplace, while maintaining confidentiality;
- Instruct sick employees to follow the CDC's "What to do if you are sick with coronavirus disease 2019 COVID-19" guidance;
- Re-double cleaning and sanitation efforts to control any risks that might be associated with workers who are ill, regardless of the type of virus or bacteria (*See links to related guidance at end of this section below.*); and
- Consult with the local health department for additional guidance, including whether to request other workers who may have been exposed to the worker who tested positive for COVID-19 to self-quarantine for 14 days.

Your local health department should be involved in monitoring the employee or individual while symptomatic and under isolation until they recover. The local health department should be involved in clearing fully recovered employees from isolation before they can return to work. The local health department may provide further guidance on monitoring and segregating employees who came into close contact with positive individuals.

The FDA periodically updates [Questions & Answers](#) that address how to respond when an employee tests positive.

CDC provides guidance on recommended disinfectants and methods for cleaning following situations when an infected employee has entered a facility:

- [CDC Interim Recommendations for US Community Facilities with Suspected/Confirmed Coronavirus Disease](#)
- [FDA Coronavirus Disease 2019 FAQ - Food Products Cleaning and Sanitation](#)
- [EPA Disinfectants for Use Against COVID-19](#)
- [EPA Emerging Viral Pathogen Guidance for Antimicrobial Pesticides](#)

*Please see the **Symptom & Exposure Protocol Best Practices** at the end of this document for suggested steps to help ensure the safe production of food and the health of employees given the current environment where COVID-19 is present.*

Does an employee testing positive affect the safety of food produced in my facility?

It does not. Importantly, FDA states: “Currently there is no evidence of food or packaging being associated with transmission of COVID-19.” FDA does not believe that food products would need to be recalled or be withdrawn from the market because a plant employee tests positive for COVID-19 virus. FDA also emphasizes that the primary responsibility of food companies with an infected worker is to take appropriate actions to protect other workers and people who may have been exposed to the ill employee.

Is a plant’s drinking water safe from COVID-19?

Thus far, EPA and the CDC have not detected the virus in drinking water sourced from public water systems. Public water systems must follow EPA regulations that include treatment regulations and treatment methods (i.e. filtration and disinfection) that prevent waterborne pathogens such as viruses from contaminating drinking water and wastewater. Based on current knowledge, it is believed that Coronavirus is particularly susceptible to disinfection, therefore, standard water treatment and disinfection processes are expected to be effective. To date, EPA advises that, based on current evidence, the risk to water supplies is low.

- [EPA Coronavirus and Drinking Water and Wastewater](#)
- [CDC Water Transmission and COVID-19](#)

Are employees working at plant wastewater treatment systems subject to increased risk of contamination?

A plant’s wastewater treatment operations should ensure workers follow routine practices to prevent exposure to wastewater. These include using engineering and administrative controls, safe work practices, and PPE normally required for work tasks when handling untreated wastewater. No additional COVID-19–specific protections are recommended for employees involved in wastewater management operations.

- [OSHA General Guidance for U.S. Workers](#)
- [CDC Water Transmission and COVID-19](#)
- [EPA Coronavirus and Drinking Water and Wastewater](#)

What is FDA doing to limit exposure of FDA inspectors?

Inspection resources are being prioritized. This means:

- Foreign facility inspections are postponed through April 2020;
- Domestically, routine surveillance inspections will be postponed; and
- Only for-cause or mission-critical inspections will be carried out, e.g., inspections in connection with a foodborne illness outbreak, a Class I recall or COVID-19.

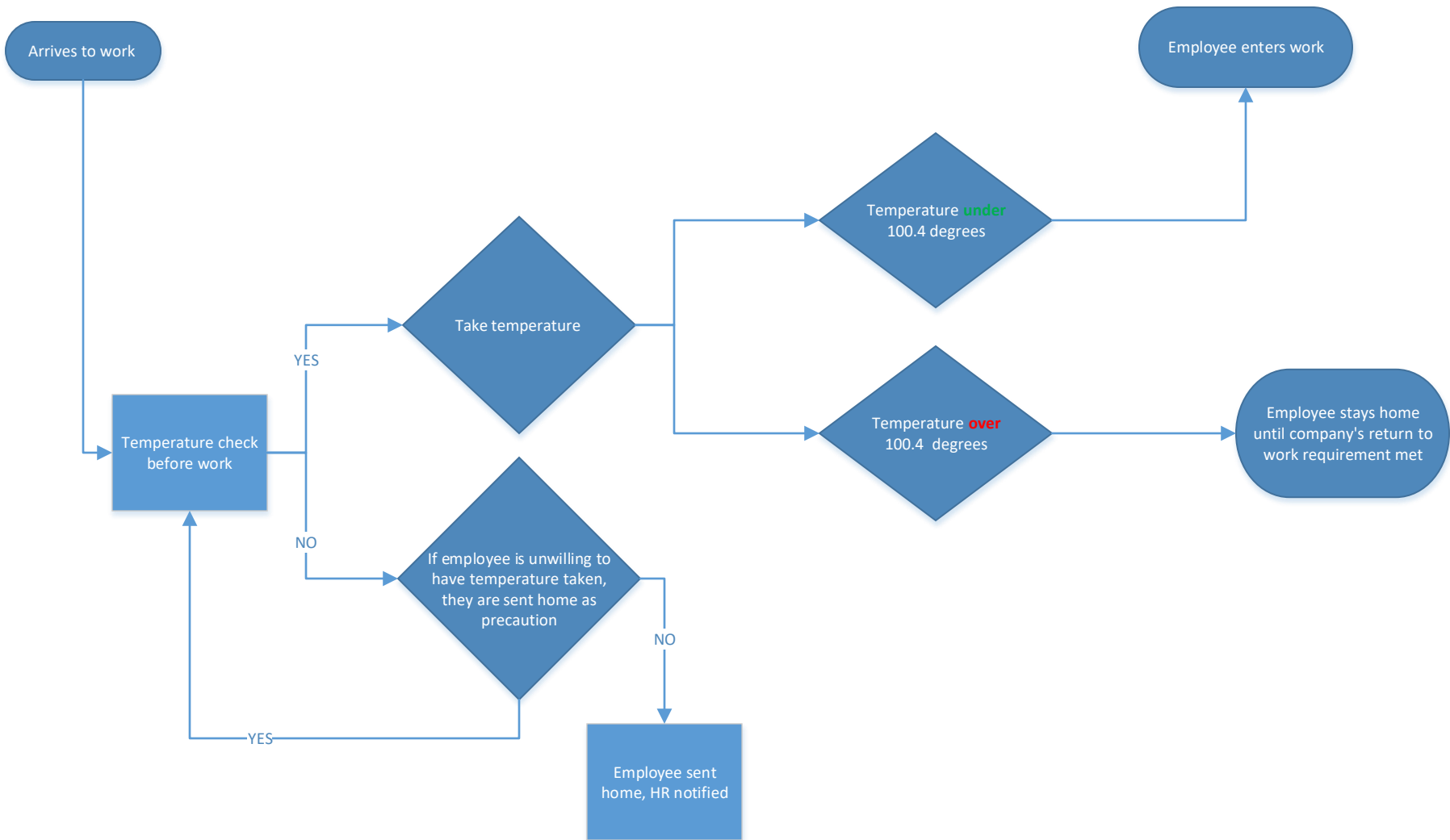
FDA will look for ways to achieve its mission without normal on-site presence and will pre-announce all inspections except in rare cases.

IDFA will provide updates and additional guidance on this subject as the situation evolves and more information emerges. Please contact IDFA using the designated email address found in our COVID-19 webpage should you have any COVID-19 related questions or concerns that are not being addressed by regulatory or health authorities.

COVID-19: Symptom & Exposure Protocol Good Practices

Employee

Screener



COVID-19: Symptom & Exposure Protocol Good Practices

