



## MPI generic guidance on COVID-19 safety requirements for primary industry businesses at Alert Level 4

### Purpose

These guidelines provide primary industry and food businesses with the minimum requirements that should be put in place to prevent transmission of COVID-19 when New Zealand is, or regions are, at COVID-19 Alert Level 4.

The MPI guidelines take into account relevant aspects of MoH, WorkSafe and MBIE guidelines for COVID-19. Business sectors and business operators within those sectors should refer to these as appropriate when writing their safety protocols, and in particular these specific statements from WorkSafe (Health and Safety at Work Act 2015).

- **Leadership:** The expectations of customers, the community, workers, and regulators is that workplaces will meet the highest possible standards and that managers, supervisors, and individual workers will actively manage adherence to the safety measures and expectations. We expect all involved to demonstrate leadership and appropriate self-supervision to ensure that these standards are met and that they are looking out for the health and safety of their colleagues and community while at work.
- **Elimination:** Businesses are obliged to eliminate transmission risks where possible, and where not, to substitute work practices or provide as higher level of control as possible. We expect that businesses maintain, or create new, practices that meet or exceed the MoH/WorkSafe guidelines as they are updated.
- **Participation:** Workplaces must engage with employees (as individuals or representatives) in any decision making for changes to work practices. Any staff consultation and/or feedback should be an ongoing process so that workplaces are able to improve practices and learn lessons to continuously improve management and safety.

MPI's industry protocols are reviewed regularly to include guidance based on new advice issued by the Ministry of Health and international bodies. MPI protocols are minimum guidance and businesses are strongly encouraged to develop additional practices that provide added levels of protection to staff.

MPI has developed enhancements to the guidance to mitigate the risk of transmission of the Delta variant of SARS-CoV-2 within primary industries premises. The enhancements reflect current international evidence regarding Delta variant transmission and considerations from multiple international counterparts, many of whom already have the Delta variant widespread in their communities and businesses.

Given the highly transmissible nature of the Delta variant, industry could look to further strengthen their practices and procedures, particularly in the following areas:

- **Strengthened workplace bubbles**—being particularly mindful of how staff travel to and from work, and how they congregate during break times.
- **Regular temperature checks** for staff and visitors and the keeping of records.

- **Maximise the distance** between staff and reduce the density of staff in bubbles as much as possible—the protocols set out a minimum.
- **Use of masks by all staff** (production and ancillary) at all times at work.
- **Strengthen the ability to trace the movements and interactions of staff** within the plant and test these systems regularly
- **Ensure there are no financial disincentives** for staff to stay at home when unwell.
- **Check and maintain ventilation systems** to ensure optimum operation.

## Scope of the guidelines

These generic guidelines reflect the responsibility of MPI in guiding and verifying safe public health practices by all primary industry businesses. They can also be used for other parts of primary industry supply chains e.g. food manufacturing businesses.

Guidelines for staff travelling to and from a workplace, as well as their accommodation in some circumstances e.g. seasonal workers in the horticulture industry, are the responsibility of the Ministry of Transport and MBIE. Guidance for these areas can be found here.

<https://www.transport.govt.nz/about/covid-19/transport-and-travel-by-alert-level/>

<https://covid19.govt.nz/covid-19/>

## Primary industry context

MPI has consulted regularly with MoH in the development of this generic guidance on COVID-19 safety requirements for primary industry businesses. MPI guidance for primary industry businesses is entirely congruent with MoH and WHO guidelines; the latter having been developed primarily for health care situations where risks of transmission of infection are higher.

NZ Food Safety is working closely with primary industry organisations on a sector-by-sector basis to assist them in incorporating generic MPI guidance within their sector guidance. Safety plans implemented by industry will be verified by NZ Food Safety Verification Services, along with other government agencies and accredited bodies, as determined by the Alert Level.

All premises should have a COVID-19 safety plan that is tailored to the business. While most primary industry sectors have adapted MPI generic guidance to their particular circumstances, recent science reports establish primary and secondary meat processing businesses as being particularly susceptible to person-to-person transmission, separate guidance documents have been developed for red meat, poultry and seafood processors at Alert Levels 3 and 2.

New scientific information on risks of transmission and best operating practice in business environments is continually coming to hand. In this regard, it is now known that infectious aerosols from a single infected person can travel at least as far as 8 metres and infect other people.

The following processing environment risk factors have been identified that increase the opportunity for person to person spread in food businesses: humidity, cold temperatures that promote virus survival, limited air flow, physical exertion, talking and shouting, and opportunities for close grouping of people; the latter especially so for the Delta variant. This particularly applies to red meat, poultry and seafood processing industries.

MPI will update generic guidance as appropriate and inform industry organisations and verifiers of any significant changes.

## **MPI guidance**

COVID-19 is transmitted from person to person, predominantly by respiratory droplets and aerosols generated when an infected person (not necessarily with symptoms) breathes, coughs, sneezes or talks. Transmission is primarily airborne face-to-face.

The specific requirements for preventing the transmission of COVID-19 are drawn from the following principles (with Delta variant enhancements below):

- Staying away from the work site if there is any suspicion of Covid-19 illness or contact with an infected person
- Monitoring the health and contact status of all workers (staff and contractors) and visitors onto the work site
- Forming workplace teams (“bubbles”) and movement corridors
- Physical distancing of staff and visitors/customers to the extent practical
- Use of clean face masks (of an appropriate grade for food processors) where adequate physical distancing can’t be maintained.
- Using other relevant personal protection.
- Changing group behaviour likely to facilitate transmission, e.g. canteen bubbles
- General hygiene, e.g. coughing etiquette, handwashing, cleaning
- Sanitising of high touch surfaces, as appropriate
- Monitoring airflow across the workspace and directing away from workers plus maximising air flow to a level practicable

All businesses should strive for a minimum physical distancing of 2 metres or more between staff. However, MPI recognises that this is not reasonably achievable for all staff in all workplace situations and flexibility is offered where this is the case (see below).

## **General safety requirements at Alert Level 4**

The following are enhanced guidelines that reflect the greater transmissibility of the Delta variant of SARS-CoV-2.

General requirements should be in place for all areas of the business e.g. harvesting, processing, distribution, essential support activities.

The safety plan should be well socialised with staff, preferably including involvement in writing.

It is recommended businesses carry out an enhanced risk assessment for their staff and business, and consistent and accurate records of the enhanced risk assessment are maintained. An example of a risk assessment tool created by Food Standards Scotland is linked here

[https://www.foodstandards.gov.scot/downloads/Risk\\_Assessment\\_Tool\\_for\\_Food\\_Business\\_Operations\\_During\\_COVID-19.pdf](https://www.foodstandards.gov.scot/downloads/Risk_Assessment_Tool_for_Food_Business_Operations_During_COVID-19.pdf)

Staff should be fully informed of the need to be fully aware of their domestic circumstances and home bubbles as it pertains to the risk to themselves and their workplace:

- Do staff live or travel with higher risk, border-facing group members such as, for example, those working in MIQ facilities, port workers or stevedores, airport workers and flight personnel?
- Where have staff travelled to recently, and could this pose a higher?

There should not be any financial disadvantages for staff calling in sick and staying home.

### **Eligibility for work**

- All staff and contractors should stay at home if they are unwell and report to the Manager for further instructions.
- Anyone who has been identified as a close contact of a suspect or confirmed case should self-isolate and not come to work for 14 days
- Workers should sign off their COVID-19 health status before work starts, preferably on entry to the workplace
- To support contact tracing, all staff, contractors and visitors should provide their full name, two forms of contact (e.g. mobile phone and email address) and time of arrival at the workplace; or preferably, use the NZ COVID Tracer app on their mobile phones and register their visit.
- Any staff feeling ill with Covid-19 like symptoms in transit to work, upon entry to work, or at work, should report immediately to their Manager. All workers having contact with ill staff should be treated the same and managed as specified in MoH guidelines.  
(<https://www.health.govt.nz/our-work/diseases-and-conditions/covid-19-novel-coronavirus>)

### **Entering the workplace**

- Enhanced temperature monitoring should be implemented at the entrance to the workplace, with proper use of thermometers to ensure accuracy of readings (new technologies are available such as temperature-detecting proximity wristbands).
- Staff with higher temperatures must be prohibited from entry to the premises.
- All data should be recorded and available for verification by a third party.

### **Inside the workplace**

- Work bubbles should be more stringently managed, preferably smaller and tighter.
- PPE should be worn by food processing and production staff throughout the workplace and especially on a chain/production line.
- Ancillary staff (non-food processing and production) should wear masks at all times, preferably N95.
- Ventilation systems should be checked regularly to ensure optimal function. Guidance on this subject is available on the UK's Health and Safety Executive and can be found here: <https://www.hse.gov.uk/coronavirus/equipment-and-machinery/air-conditioning-and-ventilation/index.htm> )

### **Physical distancing**

- Physical distancing of staff and any visitors/customers to the business should be enforced, and is recommended to be:
  - 2 metres or more where reasonably achievable.
  - between 1 and 2 metres where unavoidable, e.g. because of spatial layout.
  - less than 1 metre in specified situations; in which case special requirements apply (see below).
- Physical distancing should be measured face-to-face across a table and face-to-face when heads are turned to the side.
- Maintenance of physical distancing should include:
  - staggered breaks and shift changeover times for different teams,
  - creation of “walkways” for staff when moving through and around their work area,
  - people not facing each other when passing in narrow passageways; instead passing “side-by-side” or “back-to-back”, and
  - separate entry and exit zones with thought given to maintaining two-metre distancing.

### **Workplace “bubbles”**

- Smaller and tighter work team bubbles is recommended wherever practical so as to minimise the possibility of transmission between different groups and support business continuity.
- Each workplace bubble should enter and exit their working location as a group and sit together during breaks.
- The size of a bubble will need to be determined on a case-by-case basis taking into account workplace functionality and business continuity expectations.
- In small businesses, a workplace bubble may be the same as a “family” bubble outside the workplace as long as the same bubble measures are applied. Nevertheless, even small family businesses should consider smaller and tighter bubbles wherever possible.

- If a case or suspected case arises, all workers in the bubble should be managed as specified in MoH guidelines: <https://www.health.govt.nz/our-work/diseases-and-conditions/covid-19-novel-coronavirus>.
- Workplace supervisors should continuously monitor bubble arrangements.

## Hygiene

- All staff should have facilities to wash their hands properly, with visual reminders that hands need to be washed well with soap and water for 20 seconds and properly dried; especially upon arrival at work, after using the bathroom, after blowing their nose and before eating.
- Staff should be instructed in all aspects of safety hygiene e.g. cover coughs, sneezes with their elbow or use tissues (disposing of any tissues promptly), avoid touching their face unless they have washed their hands; such instruction should be periodically repeated.
- Masks (preferably N95) should be worn at all times by staff working in enclosed buildings.
- Staff working outdoors who are able to maintain 1-2 metre physical distancing do not need to wear masks, although it is recommended. However, masks should be donned on entering buildings, especially in areas where 1-2 metre distancing cannot be maintained.
- Masks should be replaced immediately they become inoperable, wet or contaminated. Used masks must not be put back on. Single use masks must be disposed of after doffing. Reusable masks must be washed before reuse.
- Staff should be instructed in correct use of masks. (<https://www.health.govt.nz/our-work/diseases-and-conditions/covid-19-novel-coronavirus/covid-19-information-specific-audiences/covid-19-personal-protective-equipment-workers>).
- Visors cannot be used as substitutes for masks.
- Protective clothing for normal use in processing areas should be sufficient, and protective clothing in other areas should be considered on a case-by-case basis. Glasses are not considered to be PPE.
- Work areas should be sanitised as per normal cleaning regimes using disinfectants approved for use (required in food premises), taking into consideration surface type, appropriate concentration, and effective contact time; work areas include common rooms and break rooms, communal condiment containers e.g. saltshakers, tea dispensers
- Common “*high-touch-rate*” contact surfaces specific for each business should be cleaned and sanitised more frequently, and hand sanitiser made available for staff after their use.
- Signage on safety hygiene should be prominently displayed in work areas and amenities.

### **Other requirements**

- All non-essential external visits to the business should be minimised. Any customers should be using “no-contact” facilities to the extent practical.
- The safety plan should be available for external verification if required
- Food hygiene controls in food businesses must be maintained as per normal practice.

### **Additional safety requirements when the physical distance between staff is less than 1 metre**

In unavoidable circumstances where operations cannot proceed or a return to full production cannot be achieved without physical distancing of staff at less than a metre, additional controls must be put in place to reduce any likelihood of viral transmission.

Businesses should strive to minimise the number of people in this situation.

### **Safety measure for food businesses**

Screens should be used to limit exposure to any droplets and aerosols and the minimum requirements are as follows:

- Masks (preferably N95) must be worn by staff at all times.
- Workers should also be separated by a physical intact screen so that the face-to-face distance between workers, around the screen, is a minimum of 1 metre
- The screen should be:
  - fixed in place;
  - large enough that the minimum face-to-face distance between workers above, below or around the screen is 1 metre, taking into account whether the worker is static within a workstation or moves within a range;
  - made of materials approved for use in the workplace; and
  - durable and able to be regularly cleaned (generally at the end of each shift).

Technical questions from the food business or verifier with respect to these requirements should be directed to the NZFS Director Food Science and Risk Assessment.

### **Safety requirements for non-food primary industry businesses**

Screens and masks or alternative measures that provide an equivalent level of safety may be used in primary industries other than food businesses.