April 30, 2020

NOTICE TO MEAT AND POULTRY PROCESSING EMPLOYERS AND WORKERS

Overview

Multiple outbreaks of COVID-19 among meat and poultry processing facility workers have occurred in the United States recently. This document provides guidance for meat and poultry processing workers and employers—including those involved in beef, pork, and poultry operations in the state of Nevada, and represents Nevada OSHA’s expectations for those employers to promote employee health in accordance with the joint OSHA/CDC Interim Guidance for Meat and Poultry Processing Workers and Employers (attached).

Understanding the Risks and Methods of Exposure

Meat and poultry processing facilities are a component of the critical infrastructure within the food and agriculture sector of the American workforce. Critical infrastructure employers are permitted to operate under CDC guidelines and Nevada Emergency Directive 003. All meat and poultry processing facilities should develop plans for continuing operations and should incorporate contingency plans, should the establishment face a COVID-19 infection among its workforce.

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 and at other times.

- **Duration of contact** – Meat and poultry processing workers often have prolonged closeness to coworkers (e.g., for 10-12 hours per shift), which increases 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 when workers in the plant who have the virus cough or sneeze, and 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**: Sharing transportation services and frequent contact with fellow workers in community settings in areas where there is ongoing community transmission.
Expectations for the Protection of Worker Health

At a minimum, meat and poultry processors should establish plans to protect the health of their workforce that incorporate the following elements:

1) Methods to work directly with federal, state and local public health and food safety officials to establish and continue health monitoring of the workforce.

2) Adoption of relevant aspects of CDC and OSHA guidance, including but not limited to the following:
   a. CDC’s Critical Infrastructure Guidance
   b. OSHA-CDC guidance: Meat and Poultry Processing Workers and Employers, specifically;
      i. Create and implement a COVID-19 assessment and control plan
      ii. Evaluate available engineering controls (i.e. physical barriers, modification of workstations, evaluation of HVAC systems to improve ventilation, etc.) to promote social distancing and improve workplace sanitation practices.
      iii. Evaluate available administrative controls (i.e. modified work schedules, staggered break and arrival times, monitoring of employee spacing/proximity to other workers, etc.)

3) Incorporate guidance from other authoritative sources or regulatory bodies as needed.

Meat and poultry processing establishments in the state of Nevada are expected to comply with CDC guidelines and the following state of Nevada mandates:

- Establish effective social distancing protocols, which ensure that staff maintain a 6 foot personal separation from other staff during meetings, discussions, or other job tasks. (Required/Ref. Declaration of Emergency Directive #003)
- Prohibit gatherings of 10 or more people. (Required/Ref. Declaration of Emergency Directive #007, Section 1)
- Promote frequent and thorough hand washing, including providing workers, customers, and worksite visitors with a place to wash their hands. If soap and running water are not immediately available, provide alcohol-based hand rubs containing at least 60% alcohol. (Required/Ref. Declaration of Emergency Directive #003)
- Provide face masks to service runners who deliver ordered materials to curbside pick-up locations, attend to drive through windows, or any other immediately exposing tasks. (Recommended/Ref. Federal OSHA Guidance for Retail Workers (OSHA 3996))
- Maintain regular housekeeping practices, including routine cleaning and disinfecting of surfaces and equipment with Environmental Protection Agency-approved cleaning chemicals from List N or that have label claims against the coronavirus. See: https://www.epa.gov/pesticideregistration/list-n-disinfectants-use-against-sars-cov-2 (Required/Ref. Declaration of Emergency)
- Provide sanitation and cleaning supplies for addressing common surfaces in multiple user mobile equipment and multiple user tooling. Recommended based on the specifics of a business’s services and procedures. (Ref. - Guidance on Preparing Workplaces for COVID-19, OSHA 3990-03 2020)
• Maintain 6 foot separation protocols for labor transportation services, such as buses, vans, etc. *(Required/Ref. Declaration of Emergency Directive #003)*
• Conduct daily surveys of changes to staff/labor health conditions. NV OSHA is emphasizing the need for business leadership to be working with and aware of the health and well-being of its staff. *(Required/Ref. - Guidance on Preparing Workplaces for COVID-19, OSHA 3990-03 2020)*
• Ensure that any identified first responders in the labor force are provided and use the needed Personal Protective Equipment (PPE) and equipment for protection from communicable or infections disease. *(Required/29 CFR 1910.1030)*
• Provide access to potable and sanitary water *(Required/29 CFR 1926.15 or 29 CFR 1910.141)*

For further guidance use the following links:

Executive Order Regarding Beef, Pork and Poultry Production (attached)-

OSHA/CDC Interim Guidance for Meat and Poultry Processing Workers and Employers-

Federal OSHA - https://www.osha.gov/SLTC/covid-19/


State of Nevada Health Response- https://nvhealthresponse.nv.gov/

Nevada OSHA Information: http://dir.nv.gov/OSHA/Home/

**THIS GUIDANCE IS SUBJECT TO REVISION AS ADDITIONAL INFORMATION IS GATHERED. PLEASE CHECK http://dir.nv.gov/OSHA/Home/ FREQUENTLY FOR UPDATES.**

Sincerely,

Jess Lankford
Chief Administrative Officer
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