



31 March 2020

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Dear Craig

On Monday 23 March the Prime Minister announced that New Zealand would enter a period of lockdown, effective from midnight Wednesday 25 March for a minimum of four weeks, to slow the spread of COVID-19 within our Nation. This unprecedented control measure has been taken to slow the transmission of a virus that, left unchecked, will almost certainly overwhelm our Health system, leading to unthinkable mortality rates among our fellow citizens.

While the majority of Kiwis will self-isolate in their family 'bubbles', those workers and businesses who make up our food and beverage sector have been designated an essential service. They are needed to play their part in feeding our nation and continuing to trade with those who rely on what we produce to feed theirs.

As Primary Sector leaders we have been given an opportunity to continue to provide for our country. That opportunity comes with a great responsibility to care for the public health of the employees that make up our sector, their families and their communities. I want to thank you for the way in which you are rallying together to explore amongst yourselves and with your teams, just how those twin objectives can best be met.

While there are a range of practices that can and should be introduced into essential workplaces that work to reduce the risk of the spread of COVID-19, the approach that has the greatest currency and least ambiguity is the 'two-metre' rule, our adopted yard stick for social distancing. When operating outside of our 'bubbles', excellent hygiene practices and social distancing are our two best tools to reduce the risk of transmission. The Ministry of Health has developed some very accessible material that describes these measures and how they can be thought about in a general sense in workplaces. In my experience it is important to apply an occupational overlay to these base measures in order to arrive at a point of safety and assuredness for employees.

Workplaces present different challenges and hazards in a disease transmission context. Processing plants of all sorts can be busy environments that employ large numbers of people, working in close proximity for extended periods, with limited personal protective equipment (PPE) that would reduce disease transmission. To their advantage, many plants, particularly in the fishing industry, have very high and regulated hygiene standards and standard operating procedures. Social distancing in the workplace and the absence of PPE that would mitigate virus spread when social distancing is difficult to achieve, are two significant challenges that should be addressed to ensure safe practice in the face of COVID-19.

MPI has developed a set of hygiene requirements for primary processing industries that provides a basis for operating that we will verify organisations against during the lockdown period. We will of course provide clarification where needed.

For the avoidance of doubt, we would like to see processing plants adopt a two-metre social distance rule as a base standard. We understand there will be some exceptions when the rule cannot always be observed, but we would expect those exceptions to be limited and well documented. We would not support operating below one metre of separation, and where operations are to be consistently conducted between one and two metres of separation, investment in PPE that reduces transmission risk is necessary.

I am fully cognisant that we are moving with some pace here, however time is not on our side, nor will half-measures suffice given the seriousness of the challenge in front of us all. Right now we all must innovate, be at our nimble best and demonstrate generosity toward each other.

I am seeking your endorsement and cooperation with the standards we have set as we unite against COVID-19.

Yours sincerely

A handwritten signature in black ink, consisting of a large, sweeping arch followed by a smaller, more complex flourish.

Ray Smith
Director-General

Appendix 1: Guidance on staff health and safety during alert level 4

Disease management is founded on the principles of FIND-CONTAIN-CONTROL. Because this disease spreads easily, we will not be able to FIND it as quickly as it spreads if everyone continues about their daily work. Therefore, the nation requires everyone except for essential personnel to self-isolate in their own 'Bubbles' to CONTAIN the spread of the virus.

Essential businesses, however, need to keep operating. We are aware that physical distancing best practice refers to a minimum of 1 metre and preferably 2 metres separation between people. However, some businesses cannot maintain a distance of at least 2 metres between individual staff members.

Where businesses cannot achieve the preferred physical distance of 2 metres between workers, they should ensure a minimum of 1 metre separation and should put in place additional mitigation measures (e.g. screens or personal protection equipment). It is important that all businesses tailor the principles of disease control for their specific circumstances.

They must ensure, as much as possible, that people are able to remain within their designated 'Bubble' and do not spread the virus.

Many businesses involved in food production already have exceptional health and hygiene practices and will be focused on ensuring the health and safety of their staff and the public.

Important measures for mitigation of risk include the following:

General provisions

1. Any staff who are sick should not come to work.
2. Anyone who has been in another country, or has been identified as a close contact of a probable or confirmed case, should self-quarantine and not come to work for 14 days.
3. Ensure that staff have facilities to be able to wash their hands properly with 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.
4. Continue to reinforce messages around respiratory and hand hygiene - remind staff to cover coughs, sneezes with their elbow or tissues (dispose of any tissues promptly).
5. Remind staff that they should avoid touching their face unless they have washed their hands.
6. Clean work areas frequently using a hospital grade and food-use approved disinfectant, including common rooms and break rooms, especially high touch areas.

Physical distancing of staff

7. Keep as much distance as you can between staff. Wherever possible, for static working, position staff to be at least 2 metres apart.
8. In all circumstances staff should maintain a distance of 1 metre from any other person and avoid standing face-to-face.
9. Use staggered breaks for different work teams to reduce contact in common areas.
10. Create 'walk ways' so that staff are separated when moving through and around the work area.
11. Create separate ingress and egress zones and staggered change over times so that teams do not mix in changing rooms.
12. Where possible, position staff to stand side-by-side and avoid close, face-to-face positioning.
13. Establish fixed work teams so that you minimise mixing between staff. If one of the team gets sick, quarantine the whole team (if they are considered close contacts) and use a replacement team.
14. Maintain back-up work teams to use as replacements if a team needs to be quarantined.
15. Limit all non-essential external visits and minimise contact with essential visitors using facilities such as pay-wave, internet banking and drop shipments.
16. Enable physical distancing measures between staff and visitors as much as possible.
17. Where feasible and practicable, businesses can install plastic barriers to separate workers from each other or from visitors if physical distancing cannot be achieved by other measures.

Other measures

18. Use the information that is available on the COVID19 website and print off the COVID19 posters for staff.
19. Continue your routine infection prevention and control measures for food hygiene purposes.
20. Ensure that staff are regularly briefed on measures to minimise the risk of infection and routinely monitor compliance.
21. For businesses that are able to access face masks and can ensure staff are using them correctly, this can be an additional measure to reduce transmission if close contact between staff cannot be avoided. Information about face masks is on the Ministry of Health website under COVID19.
22. Ensure your business continuity plans are up to date.

Appendix 3: Hygiene requirements for primary processing industries with work station distancing between 1 and 2 metres

Summary

All establishments should have in place a registered Covid-19 food safety plan and this should strive for a minimum social distancing of 2 metres at all times.

In exceptional circumstances, work stations spaced between 1 and 2 metres are permitted, commensurate with additional safety measures to minimise the possibility of airborne transmission.

Work stations spaced less than a metre apart are not permitted.

Background

All primary processing industries must have in place general hygiene provisions (GHP) for minimising the possibility of spread of Covid-19 between workers.

An additional combination of measures is needed to minimise transmission of Covid-19 in primary processing situations where personnel distancing of less than 2 metres is unavoidable. Setting up these measures in each premises can be viewed as similar to application of HACCP principles for a food safety plan. Additional measures will be primarily focused on minimising transmission by coughing or sneezing and will be precautionary in nature, due to the limited scientific evidence concerning inter-personnel transmission in the food industry.

The combination of measures may change for different processing situations e.g. slaughterhouses with a wet and noisy environment and rotating-personnel may require more stringent measures than those for fruit processing.

Given the small proportion of work stations with separation between 1 and 2 metres that must be maintained in most premises cf. all other work stations, we consider that the proportional increase in risk is low when appropriate measures are in place.

Principles

1. All establishments should have in place a registered Covid-19 food safety plan *that strives for a minimum social distancing of 2 metre at all times*. General requirements can be found on the MPI and MoH websites and are summarised in Appendix 1.
2. Where 2 metre distancing of work stations cannot be reasonably maintained on processing lines:
 - Specific measures must be put in place for workers at stations between 1 and 2 metres, recognising that any additional risk is primarily due to droplet transmission
 - General provisions for Covid-19 throughout the food establishment must be strengthened.
3. Work stations with spacing of less than 1 metre are not allowed.

Minimum requirements for work stations between 1 and 2 metres

- Separation distance should maximise the available distance in front of the face (related to how far a sneeze can travel), with side-by-side distance of lower importance.
- Floor supervisors allocate specific run time to monitoring worker hygiene and recording results.
- Protective clothing must be provided.
 - Use of gloves (for Covid-19 purposes) is not mandatory i.e. are only required if there is a level of common contact (food, surfaces, equipment) with neighbouring workers that is significantly above that for workers with greater than 2 metre separation
 - Use of face masks is not mandatory but is recommended if practicable (see strengthening of general requirements)
- One-on-one instruction of workers on hygiene requirements, including putting on and taking off protective clothing, handwashing and coughing etiquette

Minimum requirements for strengthening the establishment Covid 19 plan

- If not part of the general Covid-19 establishment plan for all workers, workers occupying stations less than 2 metres apart are to be screened on entry for symptoms and possible contacts
- Use of amenities separated by time from other workers.
- Separate ingress and egress arrangements to the processing floor cf. general process workers.

Attachment: General Covid-19 safety provisions for establishment plan (extracted from appendix 1)