Coronavirus Disease 2019 (COVID–19)

WEAR A MASK. PROTECT OTHERS.

Protecting Seafood Processing Workers from COVID-19

Interim Guidance from CDC and the Occupational Safety and Health Administration (OSHA). Developed in consultation with the Food and Drug Administration (FDA).

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How and What to Communicate to your Employees about COVID-19

COVID-19 Communication Plan for Select Non-healthcare Critical Infrastructure Employers

Seafood processing worksites (i.e., factories that are located in plants onshore and in vessels offshore) are a component of the critical infrastructure within the Food and Agriculture Sector ☑ . CDC's Critical Infrastructure Guidance advises that critical infrastructure workers may be permitted to continue work following potential exposure to SARS-CoV-2, the virus that causes COVID-19, provided they remain asymptomatic, they have not had a positive test result for COVID-19, and additional precautions are implemented to protect them and the community. Facilities that are not part of the critical food and agriculture sector should follow the CDC Public Health Recommendations for Community-Related Exposure following workers' potential exposure to SARS-CoV-2.

All onshore and offshore seafood processing worksites developing plans to continue operations while COVID-19 outbreaks occur among workers or in the surrounding community should:

1. Work directly with appropriate state, local, tribal, and territorial (SLTT) public health officials and occupational safety and health professionals;
2. Incorporate relevant aspects of CDC guidance, including but not limited to this guidance and the CDC's Critical Infrastructure Guidance; and
3. Incorporate guidance from other authoritative sources or regulatory bodies as needed.

This guidance is for seafood processing workers and employers. This guidance supplements but does not replace general guidance at these web sites:

- osha.gov/coronavirus 🔗
- dco.uscg.mil/Featured-Content/Mariners/Marine-Safety-Information-Bulletins-MSIB 🔗
- cdc.gov/coronavirus/2019-ncov/index.html
- cdc.gov/coronavirus/2019-ncov/community/critical-workers/implementing-safety-practices.html
- fda.gov/food/food-safety-during-emergencies/food-safety-and-coronavirus-disease-2019-covid-19 🔗

COVID-19 signs and symptoms often include a fever, cough, shortness of breath or difficulty breathing, chills, muscle pain, sore throat, or new loss of taste and smell, and can range from very mild to severe. Some people become so sick they must be admitted to the hospital, and some people may die from the illness. Our understanding about the new virus and how the virus spreads is evolving as we learn more about COVID-19, so check the CDC website for the latest information.

The virus is thought to spread mainly from person-to-person:

- Between people who are in close contact with one another (within about 6 feet).
- Through respiratory droplets produced when an infected person coughs, sneezes, or talks.

Recent studies indicate that people who are not showing symptoms can still spread the virus. It may also be possible that a person can get COVID-19 by touching a surface or object that has the virus on it and then touching their own mouth, nose, or possibly their eyes. This is not thought to be the main way the virus spreads, but we are still learning more about this virus. Workers at higher risk for serious illness include adults 65 years and older and people of any age with underlying medical conditions. Policies and procedures addressing issues related to workers at higher risk of serious illness should be made in consultation with occupational medicine and human resource professionals.

Exposure risk among seafood processing workers

Workers involved in seafood processing are not exposed to SARS-CoV-2 through the fish and other seafood products they handle. However, their work environments —processing stations and other areas in busy factories where they have close contact with coworkers and supervisors—may increase their risk of getting infected with the virus. The risk of occupational transmission of SARS-CoV-2 depends on several factors. Some of these factors are described in the U.S. Department of Labor and U.S. Department of Health and Human Services' booklet Guidance on Preparing Workplaces for COVID-19 📄 🔗 . Distinctive factors that affect workers' risk for exposure to SARS-CoV-2 in seafood processing worksites include:

- **Distance between workers** – seafood processing workers often work close to one another in seafood processing areas, such as cutting, mixing, weighing, packing, or quality control stations, on processing lines, and onboard vessels. Workers may also

be near one another at other times, such as when clocking in or out, during breaks, in locker/changing rooms, and in shared living spaces and shared transportation. Shared spaces (e.g., break rooms, locker rooms, entrances/exits, time clocks) and shared transportation (e.g., public transportation, ride sharing) to and from the worksite may increase their risk.

- **Duration of contact** – seafood processing workers often have prolonged closeness to coworkers (e.g., 8–16+ hours per shift). Extended contact with potentially infectious individuals increases the risk of SARS-CoV-2 transmission.

- **Type of contact** – seafood processing workers may be exposed to the infectious virus through respiratory droplets in the air—for example, when workers in the factory who have the virus cough, sneeze, or talk. It is also possible that exposure could occur from contact with contaminated surfaces or objects, such as tools, workstations, or break room tables.

- **Communal housing and living quarters onboard vessels for seasonal workers may also increase their risk for getting infected.**

Create a COVID–19 assessment and control plan

All seafood processing employers need to plan for assessing and controlling COVID-19 in their workplaces during the pandemic, both to protect worker health and to ensure they can continue operating safely. COVID-19 assessment and control plans —also referred to as COVID-19 response plans—may differ depending on the size of the operation, whether the factory is onshore or offshore[1], and outbreak conditions in the local area or ports.

Seafood processors COVID-19 checklist

[PDF - 842 KB]

In all seafood processing workplaces, a qualified workplace coordinator should be identified who will be responsible for COVID-19 assessment and control planning. All workers should know how to contact the identified coordinator with any COVID-19 concerns. Infection control and occupational safety and health plans should apply to anyone entering or working in the worksite (e.g., all workers, delivering fishermen and tenders, truck drivers, contractors, and others).
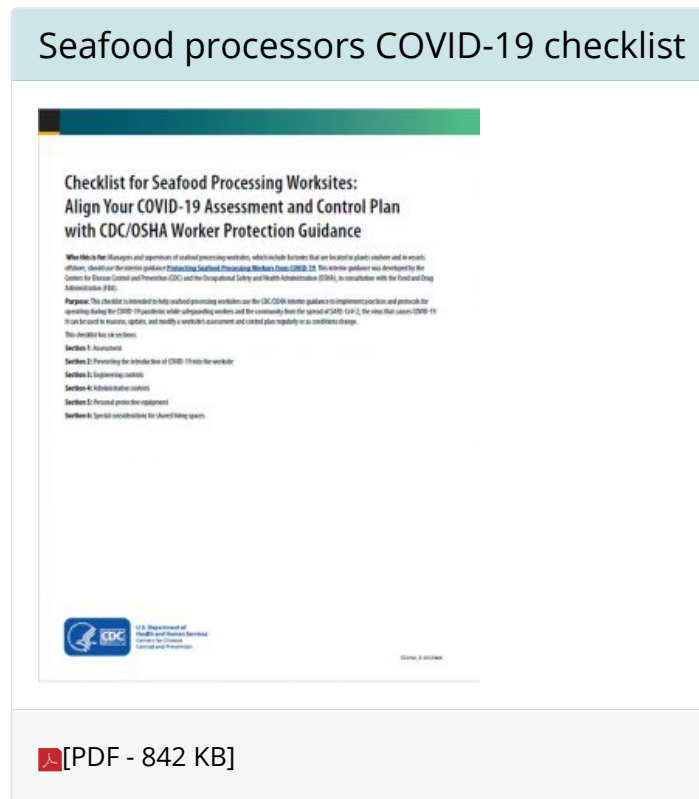
Management should stay abreast of relevant and up-to-date information concerning COVID-19 outbreak conditions in their local area and ports. For large factories with many workers, management may consider reaching out to SLTT public health officials and occupational safety and health professionals to establish ongoing communications during the pandemic. The workplace coordinators and management should also be aware of and follow all applicable federal regulations and public health agency guidelines.

Worksite assessments to identify COVID-19 risks and prevention strategies should be done periodically as part of sound occupational health and public health practice. As part of these assessments, management should consider the appropriate role for testing and workplace contact tracing (identifying person-to-person spread) of COVID-19-positive workers in a worksite risk assessment, following available CDC guidance.

Controls

Worker infection prevention recommendations are based on an approach known as the hierarchy of controls. This approach groups actions by their effectiveness in reducing or removing hazards. In most cases, the preferred approach is for management to:

1. Eliminate a hazard or processes (e.g., screen and monitor workers and exclude sick workers from the workplace).
2. Install engineering controls (e.g., modify workstations, use physical barriers and ventilation).
3. Establish and ensure employees follow administrative controls, including implementing appropriate cleaning, sanitation, and disinfection practices, and safe work practices that reduce exposure or shield workers.
4. Use personal protective equipment (PPE), in accordance with the employer's hazard assessment, to protect workers from hazards not controlled by engineering and administrative controls alone.

1. Preventing the introduction of COVID–19 into the workplace

Onshore and offshore worksites, particularly in areas where community transmission of SARS-CoV-2 is occurring, should consider developing and implementing a comprehensive strategy aimed at preventing the introduction of COVID-19 into the worksite.

Strategies for preventing the introduction of COVID-19 into the worksite include screening for fever, symptoms of and exposure to COVID-19; staying at home and self-monitoring for symptoms for 14 days prior to initial entry to the worksite; testing for SARS-CoV-2, as described in more detail below; and cooperating with federal and SLTT health authorities to facilitate contact tracing if exposures or infections warrant such.

Quarantine before entry to the worksite:

Employers operating offshore worksites (e.g., vessels), in particular, should consider having workers quarantine and self-monitor for symptoms for 14 days prior to initial entry (i.e., boarding a vessel) as a strategy to prevent SARS-CoV-2 transmission onboard the

vessel. To ensure adherence, employers should consider providing paid leave during the period of quarantine or should consider the quarantine time as worktime. Note that employers with fewer than 500 employees are eligible for 100% tax credits ⬈ for Families First Coronavirus Response Act COVID-19 paid leave provided through December 31, 2020, up to certain limits. Offshore workers are in close proximity to one another continuously while working and off duty but otherwise may be isolated from outside exposures to SARS-CoV-2. Onshore worksites may experience similar situations when seasonal workers live in congregate housing, especially in remote and rural areas where they do not have contact with individuals outside of their own cohort. Follow SLTT guidance on quarantine and testing procedures.

Testing of workers:

Testing after a COVID–19 case is identified

CDC's "Testing Strategy for Coronavirus (COVID-19) in High-Density Critical Infrastructure Workplaces after a COVID-19 Case is Identified" presents options for testing exposed coworkers for use when public health organizations and employers determine testing is needed to help support existing disease control measures. Note that CDC advises that critical infrastructure workers may be permitted to continue work ⬞ at their regular duties following potential exposure to COVID-19, provided they remain asymptomatic and additional precautions are implemented to protect themselves, their coworkers, and the community, including continued screening for symptoms. However, if tested, their results must be negative for them to continue working. (See CDC's Interim Guidance for Implementing Safety Practices for Critical Infrastructure Workers Who May Have Had Exposure to a Person with Suspected or Confirmed COVID-19 ⬞ .)

A risk-based approach to testing co-workers of a person with confirmed COVID-19 may be applied. Such an approach should take into consideration the likelihood of exposure, which is affected by the characteristics of the workplace and the results of contact investigations. One approach to testing is to establish a priority for testing (for example, CDC's tiered approach) based on an assessment of risk in the workplace and other factors such as high rates of COVID-19 transmission in the surrounding community or workers' households. The highest priority would be for testing of co-workers who were exposed to a worker with confirmed COVID-19, beginning 2 days before the individual with COVID-19 became symptomatic (or, for asymptomatic workers, 2 days prior to specimen collection) until the time of isolation. Other co-workers could be tested based on an assessment of risk in the workplace, such as the layout and size of the room, the design and implementation of engineering controls, adherence to administrative controls[2], and movement of workers within the area. Other strategies could involve testing all co-workers if a worker tests positive for COVID-19 or testing all co-workers upon identification of an individual with symptoms consistent with COVID-19. Testing can also be used in assessing whether workers who have been quarantined due to COVID-19 can return to work.

Testing asymptomatic workers without SARS–CoV–2 exposure

A strategy aimed at reducing introduction of SARS-CoV-2 into the work setting through early identification could reduce the risk of widespread transmission. CDC has recommended guidelines for testing for asymptomatic individuals without known or

suspected SARS-CoV-2 exposure for early identification in special settings. This guidance can be found here. High-density critical infrastructure workplaces, such as seafood processing vessels and facilities where continuity of operations is a high priority, are settings for which these approaches could be considered.

Employers are encouraged to work with SLTT health departments to help inform decision-making about broad-based testing. Before testing large numbers of asymptomatic individuals without known or suspected exposure, the facility should have a plan in place for how it will modify operations based on test results.

Employers planning to incorporate testing into their COVID-19 prevention efforts should ensure the worksite has a testing plan in place based on contingencies informed by the Centers for Disease Control and Prevention (CDC).

At minimum, the plan should consider the following components:

- The priorities for testing of workers, such as the tiered approach described above.
- The capacity for workers to receive a single baseline COVID-19 test and receive the results before entering the worksite. Similarly, the capacity for all workers to be tested upon identification of an individual with symptoms consistent with COVID-19, or if a worker tests positive for COVID-19. Capacity for continuance of re-testing, as needed, based on the situation.
- An arrangement with laboratories to process tests. The test used should be able to detect SARS-CoV-2 virus (e.g., polymerase chain reaction (PCR)) with greater than 95% sensitivity, greater than 90% specificity, with results obtained rapidly (e.g., within 48 hours). Antibody test results should not be to the sole basis for diagnosing someone with an active SARS-CoV-2 infection.
- A procedure for addressing workers that decline or are unable to be tested (e.g., symptomatic worker refusing testing in a worksite with positive COVID-19 cases should be treated as positive).
- Testing of new entrants into the workplace and/or those re-entering after a prolonged absence (e.g., one or more days).

Adaptations to other guidance after quarantine and testing:

In worksites in which both quarantine and testing strategies have been implemented, and workers have no contact with individuals outside of their own cohort (e.g., a vessel crew, an isolated population of workers in congregate housing in remote/rural areas with no contact with the community), employers may be able to relax some engineering and administrative control measures, if those measures are otherwise infeasible in the work environment. For example, onboard vessels it may not be feasible to rearrange workstations or modify sleeping quarters. If new members are introduced to a cohort of workers, such as the exchange of a crewmember onboard a vessel, then it may not be appropriate to continue with relaxed infection prevention strategies, unless that new member has also been quarantined and tested as described above.

Consider a program of screening[3] workers before they enter the worksite, excluding sick workers from the worksite, and using criteria to ensure safety when workers return to work. This type of program, described in more detail below, should be coordinated to the

extent possible with local public health authorities and could consist of the activities described below.

Screening workers for COVID–19

Screening seafood processing workers for COVID-19 signs and symptoms (such as temperature checks) is an optional strategy that employers may use. If implemented for all workers, policies and procedures for screening workers should be developed in consultation with SLTT health officials and occupational medicine professionals.

Options to screen workers for COVID-19 symptoms include:

- Screen them before they enter the worksite or board the processing vessel.
- Provide verbal screening in appropriate languages to determine whether workers have had a fever, respiratory symptoms, or other symptoms in the past 24 hours.
- Check temperatures of workers at the start of each shift to identify anyone with a fever of 100.4°F or greater (or reported feelings of feverishness). Ensure that screeners:
  - are trained to use temperature monitors and monitors are accurate under conditions of use (such as cold temperatures); and
  - wear appropriate PPE, as described in the next section.

- Do not let employees enter the worksite if they have a fever of 100.4°F or greater (or reported feelings of feverishness), or if screening results indicate that they are suspected of having COVID-19.
  - Encourage sick workers to self-isolate and contact a healthcare provider.
  - Provide information on the worksite's return-to-work policies and procedures to sick workers.
  - Inform human resources, employer health unit (if in place), and supervisor about sick workers (so workers can be moved off schedule during illness and replacements can be assigned, if needed).

For both onshore and offshore employees, ensure that personnel performing screening activities, including temperature checks, are appropriately protected from exposure to potentially infectious workers entering the worksite:

- Implement engineering controls, such as physical barriers or dividers or rope and stanchion systems, to maintain at least six feet of distance between screeners and workers being screened.
- If screeners need to be within six feet of workers, provide them with appropriate PPE based on the repeated close contact the screeners have with other workers.
  - Such PPE may include gloves, a gown, a face shield, and, at a minimum, a face mask.
  - N95 filtering facepiece respirators (or more protective) may be appropriate for workers performing screening duties and necessary for workers managing a sick employee in the work environment (see below) if that employee has signs or symptoms of COVID-19. If respirators are needed, they must be used in the

context of a comprehensive respiratory protection program that includes medical exams, fit testing, and training in accordance with OSHA's Respiratory Protection standard (29 CFR 1910.134 ⧉).

Managing sick workers

When **onshore** workers report or have symptoms (e.g., fever, cough, or shortness of breath) upon arrival at work or who become sick during the day, immediately separate them from others at the worksite and send them home.

When **offshore** workers report or have symptoms, immediately separate them from others on the vessel. Vessel medical staff, management, and telemedicine providers should discuss the disembarkation of patients suspected or known to have COVID-19 with applicable federal, SLTT, and port authorities to ensure the safe disembarkation and medical transportation of the patient.

If workers dwell in employer-provided housing or shared living quarters, it may not be possible to safely send them home to isolate and recuperate. In such instances, develop isolation plans for workers who are suspected of having COVID-19 or who are COVID-19-positive to recuperate without infecting others (i.e., designate a private sleeping space):

- In shared living quarters, consider establishing areas for sleep/rest that accommodate single occupancy during the pandemic and a separate bathroom (if available).
- Direct vessels to plan for medical evaluation of potentially sick workers. Vessel medical staff, management, and telemedicine providers should discuss the disembarkation of patients suspected or known to have COVID-19 with applicable federal, SLTT, and port authorities to ensure the safe disembarkation and medical transportation of the patient.
- Ensure that vessels carry a sufficient quantity of PPE and medical supplies to meet demands while at sea.
- See the section below on special considerations for shared living spaces.

Ensure that personnel managing sick employees are appropriately protected from exposure. When personnel need to be within six feet of a sick colleague, appropriate PPE may include gloves, a gown, a face shield and, at a minimum, a face mask. N95 filtering facepiece respirators (or more protective) are necessary for workers managing a sick employee if that employee has signs or symptoms of COVID-19. If respirators are needed, they must be used in the context of a comprehensive respiratory protection program that includes medical exams, fit testing, and training in accordance with OSHA's Respiratory Protection standard (29 CFR 1910.134 ⧉).

If a worker is confirmed to have COVID-19, inform anyone they have come into contact with (including fellow workers, inspectors, graders, etc.) of their possible exposure to COVID-19 in the workplace, but maintain the sick employee's confidentiality as required by the Americans with Disabilities Act (ADA) ⧉ . Instruct fellow workers about how to proceed based on the CDC Public Health Recommendations for Community-Related Exposure.

If a worker becomes or reports being sick, disinfect the workstation used and any tools or equipment handled by that worker.

Work with SLTT health officials to facilitate the identification of other exposed and potentially exposed individuals, such as coworkers in a facility.

On-site healthcare personnel, such as worksite nurses or emergency medical technicians, should follow appropriate CDC and OSHA guidance for healthcare and emergency response personnel.

Addressing return to work

- Critical infrastructure employers have an obligation to manage the continuation of operations and workers' return to work in ways that best protect the health of workers, their coworkers, and the general public.
- Consider providing screening and ongoing medical monitoring of workers, ensuring they wear an appropriate source control device (e.g., cloth face coverings ⤢) in accordance with CDC and OSHA guidance and any SLTT requirements, and implementing social distancing to minimize the chances of workers exposing one another.
- Continue to minimize the number of workers present at worksites, balancing the need to protect workers with support for continuing critical operations.

*For workers who have **not** had symptoms of COVID-19*

- When reintegrating (bringing back) exposed workers with no COVID-19 symptoms to onsite operations, follow the CDC Critical Infrastructure Guidance. Workers who have been exposed to COVID-19 but remain without symptoms, may continue to work, provided they adhere to additional safety precautions. Consult with an occupational health provider and SLTT health officials for help developing the most appropriate plan.
- When reintegrating workers with confirmed COVID-19, including those workers who have remained symptom-free, to onsite operations, follow the CDC interim guidance, "Discontinuation of Isolation for Persons with COVID-19 Not in Healthcare Settings." As noted above, consult with an occupational health provider and SLTT health officials for help developing the most appropriate plan.

For workers who have had symptoms of COVID-19

- Workers with COVID-19 who have symptoms and have stayed home (home isolated) should not return to work until they have met the criteria to discontinue home isolation and have consulted with their healthcare providers and SLTT health departments.

As you move forward with continuing essential work, implement strategies to prioritize positions without which critical work would stop. Include an analysis of work tasks, workforce availability at specific worksites, and assessment of hazards associated with the tasks and worksite. You may be able to cross-train workers to perform critical duties at a worksite to minimize the total number of workers needed to continue operations.
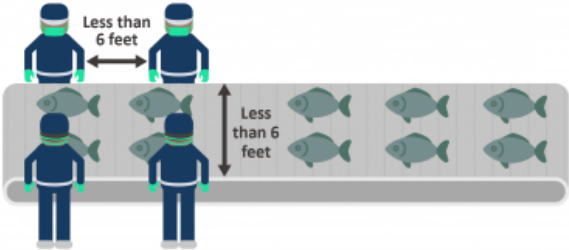
The situation is constantly changing, so employers of critical infrastructure workers will need to continue to reassess the virus's transmission levels in their area and ports and follow recommendations from SLTT and federal officials. This guidance does not replace SLTT directives for businesses.
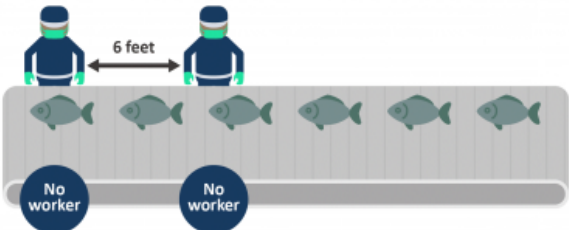
2. Engineering controls

Configure communal work environments so that workers are spaced at least six feet apart, if possible. Current information about the spread of SARS-CoV-2 by people who are infected but have no symptoms supports the need for social distancing and other protective measures within a seafood processing work environment. Changes in production practices may be necessary to maintain appropriate distances among workers.

How to Align Seafood Processing Workstations, if Feasible
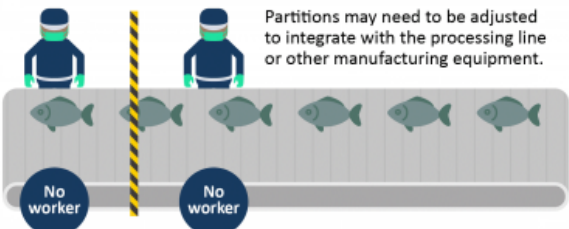
Bad: Workers are within six feet of one another, including at side-by-side or facing workstations.

Less than 6 feet

Less than 6 feet

Good: Workers are spaced at least six feet apart, not facing one another. Other configurations may be used to achieve similar distancing between workers.

6 feet
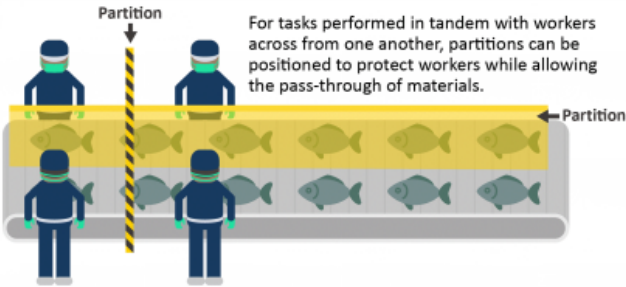
No worker

No worker

Good: Physical barriers, such as partitions, separate workers from each other.

Partitions may need to be adjusted to integrate with the processing line or other manufacturing equipment.

No worker

No worker

Good: Physical barriers, such as partitions, separate workers from each other, including where workers need to perform tasks in tandem across from one another.

Partition

For tasks performed in tandem with workers across from one another, partitions can be positioned to protect workers while allowing the pass-through of materials.

Partition

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Modify the alignment or arrangement of workstations, including along processing lines in factories and conveyors used for loading and offloading goods (e.g., raw fish, packaged or frozen seafood), if feasible, so that workers are at least six feet apart in all directions (e.g., side-to-side and when facing one another), when possible. Ideally, modify the alignment of workstations so that workers do not face one another. Consider using 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, plexiglass or similar materials, or other impermeable dividers or partitions, to separate seafood processing workers from each other, if feasible.

Worksites should consider consulting with a heating, ventilation, and air conditioning engineer to ensure adequate ventilation in work areas to help minimize workers' potential exposures.

If fans, such as pedestal fans or hard-mounted fans, are used in the worksite, take steps to minimize air from fans blowing from one worker directly at another worker. Personal cooling fans should be removed from the workplace to reduce the potential spread of any airborne or aerosolized viruses. If fans are removed, employers should remain aware of, and take steps to prevent, heat hazards ☑ .

Evaluate the need for additional handwashing and hand sanitizing locations that are easily accessible to workers to reduce congestion during shift changes. Determine where handwashing and hand sanitization stations are needed; and consult OSHA's Sanitation standard (29 CFR 1910.141 ☑) and/or FDA's good manufacturing practices (GMPs) ☑ for food processing operations. 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. Consider alternatives such as touch-free methods or staggering times for workers to clock in/out.

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 volume such as training and conference rooms, or using outside tents for break and lunch areas.

3. Administrative controls

Employers should take the following steps to promote social distancing among workers:

- Encourage single-file movement with a six-foot distance between each worker through the worksite, where possible.
- Designate workers to monitor and facilitate distancing on processing floor lines.
- Stagger break times or provide additional break areas and restrooms to avoid groups of workers during breaks. Workers should maintain at least six feet of distance from others at all times, including on breaks.
- Stagger workers' arrival and departure times to avoid congregations of workers in parking areas, locker rooms, and near time clocks.

- Provide visual cues (e.g., floor markings, signs) as a reminder to workers to maintain social distancing.
- Discour

Help prevent the spread of COVID-19 when carpooling

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workers from carpooling to and from work, if possible.

- If public transportation, 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 and increasing the frequency of trips.
  - Encourage employees in a shared van or car space to wear cloth face

coverings.

- Encourage employees to maintain social distancing as much as possible.
- Make hand hygiene (hand washing and alcohol-based hand sanitizer with at least 60% alcohol) available and encourage employees to use hand hygiene before entering the vehicle and when arriving at their destination.
- Clean and disinfect commonly touched surfaces after each carpool or shuttle trip (e.g., door handles, handrails, seatbelt buckles).
- Encourage employees to follow coughing and sneezing 🗎 etiquette when in the vehicle.
- Advise drivers to lower vehicle windows to increase airflow.

  - If workers need to carpool, employers should consider training the workers on infection prevention practices when in shared vehicles, to help reduce the risk of workers spreading COVID-19 to one another.

Employers may determine that modifying workstations, including processing or production lines, and staggering workers across shifts would help to maintain overall seafood processing capacity while measures to minimize exposure to SARS-CoV-2 are in place. For example, a factory that normally operates on one daytime shift may be able to split workers into more than one shift throughout a 24-hour period. In some seafood processing operations, one shift may need to be reserved for cleaning and sanitizing. Workers and managers should also take steps to manage workplace fatigue.

Monitor and respond to absenteeism at the workplace. Implement plans to continue essential business functions in cases of higher than usual absenteeism.

Review leave policies and incentives:

- Review sick leave policies and consider modifying them to make sure that ill workers are not in the workplace. Make sure that employees are aware of and understand these policies.
- Analyze any incentive programs and consider modifying them, if warranted, so that employees are not penalized for taking sick leave if they have COVID-19.
- Additional flexibilities might include giving advances on future sick leave and allowing employees to donate sick leave to each other.

Consider cohorting (grouping together) workers. This can increase the effectiveness of altering the factory's normal shift schedules by making sure that groups of workers are always assigned to the same shifts with the same coworkers. Cohorting may reduce the spread of infection in the workplace by minimizing the number of different individuals who come into close contact with each other over the course of a week. Cohorting may also reduce the number of workers quarantined because of exposure to the virus. Consider extending cohorting to transportation and communal housing where possible.

Establish a system for employees to alert their supervisors if they are experiencing symptoms of COVID-19 or if they have had recent close contact with a person who has suspected or confirmed COVID-19.

Evaluate existing handwashing/hand sanitizing requirements and practices.

Employers may need to implement a multi-step hand sanitizing procedure to ensure effectiveness against SARS-CoV-2 and conformity with GMPs. Washing hands with soap and running water for at least 20 seconds can help prevent the spread of SARS-CoV-2. However, GMPs in food processing may necessitate use of dip stations with 100-200 ppm chlorine or 12.5-25 ppm iodine to control pathogens associated with foodborne illness. Consult with the dip solution manufacturer and EPA guidance ⧉ to determine whether the dip stations used in a particular facility are also effective against SARS-CoV-2. If alcohol-based hand sanitizer is made available for use in areas where it is allowed under GMPs and to supplement hand washing, it should contain at least 60% alcohol to be effective against SARS-CoV-2.

Food processing employers should consider developing written policies about which employees can use hand sanitizer, in what areas or parts of a processing worksite it can be used, and other considerations pertinent to the food processing environment. Hand sanitizers are not intended to replace handwashing in food production and retail ⧉ settings. Instead, hand sanitizers may be used in addition to or in combination with proper handwashing.

- Consider posting additional visual cues reminding employees of the importance of hand hygiene. Monitor the implementation of these requirements.

- Ensure workers have access to and frequently use appropriate hand hygiene facilities. Give employees enough time to wash and dry their hands, and provide accessible sinks, soap, water, and a way to dry their hands (e.g., paper towels, hand dryer). See OSHA's Sanitation standard (29 CFR 1910.141 ⧉).

- Place hand sanitizers and/or drip stations in multiple locations, as appropriate, to encourage hand hygiene.

- See additional discussion of hand sanitizers in the Engineering Controls section, above.

Consider other workplace programs to promote personal hygiene, such as:

- Building additional staggered, short breaks into staff schedules to increase how often staff can wash their hands with soap and water;

- Providing tissues and no-touch trash receptacles for workers to use and ensuring workers adhere to GMPs for handwashing after blowing their noses, wiping their faces, etc.;

- Educating workers to avoid touching their faces, including their eyes, noses, and mouths, particularly until after they have thoroughly washed their hands; and

- Educating workers to wash and sanitize (i.e., in dip stations, as required) their hands upon completing work and/or removing PPE, after removing face coverings, and before and after eating, smoking, or touching their face.

Cloth face coverings in seafood processing worksites

CDC recommends wearing cloth face coverings as a protective measure in addition to staying at least 6 feet away from others. Cloth face coverings may be especially important when social distancing is not possible or feasible based on working conditions. A cloth face covering may reduce the amount of large respiratory droplets that a person spreads when talking, sneezing, or coughing. Cloth face coverings may prevent people who do not know they have the virus that causes COVID-19 from spreading it to others. Cloth face coverings are intended to protect other people—not the wearer.

Cloth face coverings are not PPE. Cloth face coverings should not be used as a substitute for a respirator or surgical mask in workplaces where such equipment is needed to protect the wearer.

While wearing cloth face coverings is a public health measure intended to reduce the spread of COVID-19 in communities, it may not be practical for workers to wear a single cloth face covering for the full duration of a work shift (e.g., eight or more hours) in a seafood processing facility if they become wet, soiled, or otherwise visibly contaminated during the work shift. If cloth face coverings are worn in these worksites, employers should provide readily available clean cloth face coverings (or disposable facemask options) for workers to use when the coverings become wet, soiled, or otherwise visibly contaminated.

Employers who determine that cloth face coverings should be worn in the workplace, including to comply with state or local orders, should ensure the cloth face coverings:

- Fit over the nose and mouth and fit snugly but comfortably against the side of the face;
- Are secured with ties or ear loops;
- Include multiple layers of fabric;
- Allow for breathing without restriction;
- Can be laundered using the warmest appropriate water setting and machine dried daily after the shift, without damage or change to shape (a clean cloth face covering should be used each day);
- Are not used if they become wet or contaminated;
- Are replaced with clean replacements, provided by employer, as needed;
- Are handled as little as possible to prevent transferring infectious materials to the cloth; and
- Are not worn with or instead of respiratory protection ⬏ when respirators are needed.

Educate and train workers and supervisors about how they can

Educate and train workers and supervisors about how they can reduce the spread of COVID-19

Supplement workers' normal and required job training (e.g., training required under OSHA standards) with additional training and information about COVID-19, recognizing signs and symptoms of infection, and ways to prevent exposure to the virus. Training should include information about how to implement the various infection prevention and control measures recommended here and included in any infection prevention and control or COVID-19 response plan that an employer develops. OSHA provides additional information ↗ about training on its COVID-19 webpage.

All communication and training should be easy to understand and should (1) be provided in languages appropriate to the preferred languages spoken or read by the workers, if possible; (2) be at the appropriate literacy level; and (3) include accurate and timely information about:

- Signs and symptoms of COVID-19, how it spreads, risks for workplace exposures, and how workers can protect themselves;
- Proper handwashing practices and use of hand sanitizer and/or dip stations;
- Cough and sneeze etiquette;
- Other routine infection control precautions (e.g., signs and symptoms of COVID-19, putting on or taking off masks or cloth face coverings and social distancing measures); and
- Procedures to follow when an employee becomes sick or is exposed to someone who is potentially sick.

Employers should place simple posters in all of the workers' common languages that encourage staying home when sick, cough and sneeze etiquette, and proper hand hygiene practices. They should place these posters at the entrance to the workplace and in break areas, locker rooms, and other workplace areas where they are likely to be seen.

CDC has free, simple posters available to download and print, some of which are translated into different languages. The Stop the Spread of Germs poster 🅿 is available in Amharic 🅿 , Arabic 🅿 , Burmese 🅿 , Dari 🅿 , Farsi 🅿 , French 🅿 , Haitian Creole 🅿 , Kinyarwanda 🅿 , Karen 🅿 , Korean 🅿 , Nepali 🅿 , Pashto 🅿 , Portuguese 🅿 , Russian 🅿 , Simplified Chinese 🅿 , Somali 🅿 , Spanish 🅿 , Swahili 🅿 , Tigrinya 🅿 , Ukrainian 🅿 , and Vietnamese 🅿 .

Employers should post signs that you can read from a far distance (or use portable, electronic reader boards) that inform visitors and workers of social distancing practices.

OSHA understands that some employers may face difficulties complying with certain OSHA standards due to the ongoing health emergency, including those standards that require certain types of worker training. OSHA is providing enforcement discretion ↗ around completion of training and other provisions in its various standards. OSHA has instructed its Compliance Safety and Health Officers (CSHOs) to evaluate whether an employer has made a good faith effort to comply with applicable OSHA standards and, in situations where compliance was not possible given the ongoing pandemic, to ensure that employees were not exposed to hazards from tasks, processes, or equipment for which

they were not prepared or trained. OSHA also offers an On-Site Consultation Program [↗] and has compliance assistance specialists [↗] available to help employers comply with OSHA standards.

Cleaning and disinfection in seafood processing worksites

Consult general CDC guidance for cleaning and disinfecting worksites, which may help guide planning for COVID-19 disinfection in seafood processing operations.

For tool-intensive operations, employers should ensure tools (e.g., knives, scissors) are regularly cleaned and disinfected, including at least as often as workers change workstations or move to a new set of tools. Refer to List N [↗] on the EPA website for EPA-registered disinfectants that have qualified under EPA's emerging viral pathogens program for use against SARS-CoV-2. Worksites should remain aware of FDA's requirements with regard to food contact surfaces when selecting sanitizing alternatives. See the FDA Frequently Asked Question (FAQ) on this topic: What steps do I need to take to clean the facility/equipment to prevent the spread of COVID-19? [↗]

Evaluate current cleaning and sanitizing procedures and if necessary, develop a written sanitation program that defines cleaning and sanitizing procedures and a schedule for utensils, processing equipment, and workstations. If possible, increase the frequency of cleaning and sanitizing in work areas. Consider establishing a similar written protocol for the increased cleaning and sanitizing of non-processing areas such as restrooms, locker rooms, office work areas, cafeterias, vessel galleys, break areas, and common spaces that ensures routine cleaning and disinfection of frequently touched surfaces (e.g., doors, time clocks, microwave or refrigerator handles, sinks, dispensers, or vending machine touchpads) at least once per shift, if possible. Frequently clean push bars and handles on any doors that do not open automatically and handrails on stairs or along walkways. If physical barriers are being used, then these should be cleaned frequently.

Workers who perform cleaning and disinfection tasks may require additional PPE and other controls to protect them from chemical hazards posed by disinfectants. Note: Employers must [↗] ensure their written hazard communication program is up to date and training is up to date for all employees. Also see OSHA's enforcement discretion memorandum [↗] on this topic. Employers may need to adapt guidance from this section, the Environmental Services Workers and Employers [↗] section, and the Interim Guidance for Workers and Employers of Workers at Increased Risk of Occupational Exposure [↗] , to fully protect workers performing cleaning and disinfection activities in manufacturing workplaces.

4. Personal protective equipment

Employers must conduct a hazard assessment to determine if hazards are present, or are likely to be present, for which workers need PPE. OSHA's PPE standards (29 CFR part 1910, subpart I [↗]) require employers to select and provide appropriate PPE to protect workers from hazards identified in the hazard assessment. The results of that assessment will be the basis of workplace controls (including PPE) needed to protect workers. Employers subject to these standards must determine if PPE (such as gloves, surgical masks, and face shields) is necessary for employees to work safely after considering whether engineering and administrative controls and safe work practices (such as social distancing or the use

of cloth face coverings) can effectively mitigate identified hazards. Employers should consider modifying worker interaction in order to reduce the need for PPE, especially in light of potential equipment shortages.

Employers should:

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

Face shields may serve as both PPE and source control:

- 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 person-to-person droplet spread.
  - 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; worksites should consult with an 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 worksite.
- If used, face shields should also wrap around the sides of the wearer's face and extend to below the chin.

Employers should stress hand hygiene before and after handling all PPE. Employers in seafood processing industries should continue to stay up to date on the most current guidance concerning PPE.

As part of their hazard assessments, employers must always consider whether PPE is necessary 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 at processing stations or on processing lines or disinfectants used for worksite cleaning, PPE should be considered.

However, during the COVID-19 pandemic, seafood processing employers should consider allowing voluntary use of filtering facepiece respirators (such as an N95, if available) for their workers, even if respirators are not normally required. Where voluntary use of filtering facepiece respirators is permitted, the employer is required to provide a copy of Appendix D of the Respiratory Protection standard to employees (29 CFR 1910.134 ↗). Consider CDC guidance for conserving and extending filtering facepiece respirator supplies in non-healthcare sectors. In addition to face shields as noted above, workers in

seafood processing worksites may need PPE such as gloves, face and eye protection, and other types of PPE when cleaning and disinfecting seafood processing factories (including frequently touched surfaces), tools, and equipment. Workers in the seafood processing industry likely use a variety of types of gloves for daily work activities, so employers should ensure that gloves used for cleaning and disinfection are protective against hazards associated with those tasks.

When PPE is needed, employers should consider 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) with respect to the work environment (e.g., machinery in which PPE could get caught).

Special considerations for shared living spaces

Seafood processing workers may have limited control over their environment in some employer-furnished housing and living quarters. Owners/operators should provide basic guidance about COVID-19 and steps being taken to prevent transmission in living areas in language(s) the workers understand. Workers and employers should take steps to improve sleep and manage fatigue, such as maintaining a sleeping area that is comfortable, dark, cool, and quiet.

Most importantly, in employer-furnished living spaces, the owner/operator should provide a dedicated and segregated space for sleeping quarters, kitchens, and restrooms for workers with confirmed or suspected COVID-19 to recuperate without infecting others.

Shared living spaces and enhanced sanitation

- Provide disposable gloves, soap for hand washing, and household cleaners to help residents and staff implement cleaning and disinfection measures.
- Develop and implement enhanced sanitation and cleaning plans that address frequency of sanitation and cleaning and identify a person responsible for overseeing and implementing the plan.

Sanitizing living spaces, cooking and eating areas, bathrooms, and laundry facilities

- Ensure shared rooms have good air flow:
  - Provide air filtration systems and change filters according to the manufacturer's directions.
  - If possible, open windows, or use an air conditioner, making sure to clean units and change filters according to the manufacturer's directions.
- Clean common areas routinely following CDC cleaning and disinfection guidelines.
- Restrict the number of people allowed in the kitchen and cafeteria, or galley, at one time so that everyone can stay at least 6 feet apart from one another.
  - People who are sick, their roommates, and those who have higher risk of severe illness from COVID-19 should eat or be fed in their room, if possible.

- Do not share dishes, drinking glasses, cups, or eating utensils. Non-disposable food service items used should be handled with gloves and washed with dish soap and hot water or in a dishwasher. Wash hands after handling used food service items.
- Use gloves when removing garbage bags and handling and disposing of trash. Wash hands.
- Maintain access to laundry facilities and post guidelines for doing laundry (e.g., restrict the number of people allowed in laundry rooms at one time to ensure social distancing).
- Provide appropriate storage and laundry options for reusable PPE, such as work gloves, coveralls, safety glasses, boots, etc., to prevent cross-contamination.

Living spaces and social distancing

Support social distancing during the entire time seafood processing workers are in shared living spaces, including while recreating, doing laundry, cooking, eating, and sleeping.

Offer individual rooms for individuals when possible. If shared sleeping rooms in onshore housing are necessary, consider modifications to bed configurations to maximize social distancing in sleeping quarters, to the extent feasible. This may be accomplished through:

- Head-to-toe sleeping arrangements with at least 6 feet of distance between beds.
- Adding physical barriers, such as plastic flexible screens when beds cannot be 6 feet apart.
- Minimizing or avoiding the use of bunkbeds, which make distancing more difficult.

Add physical barriers, such as plastic flexible screens, between bathroom sinks when there are multiple sinks and in other areas where seafood processing workers are in close contact. Modify housing to encourage social distancing, including furniture removal or spacing.

If possible and environmental conditions allow, conduct meetings and conversations outdoors to minimize congregating in close quarters.

Encourage residents to wear cloth face coverings in shared spaces. Advise residents that cloth face coverings should not be placed on anyone who is unconscious, incapacitated, or otherwise unable to remove the mask without assistance.

Other important considerations in shared living spaces

- Institute daily health checks (e.g., symptom and/or temperature screening) and daily reporting to supervisors prior to and during the housing period to identify illnesses early.
- Complete the health checks in a way that keeps workers from congregating in large crowds, such as providing multiple screening points or staggered reporting times.
- Maintain confidentiality of workers with confirmed COVID-19 infection.
- Establish isolation plans for responding to seafood processing workers with COVID-

19:

- Provide accommodations separate from others. Designate one person to assist an ill, isolated person. Ensure that personnel managing sick employees are appropriately protected from exposure. When personnel need to be within 6 feet of a sick colleague, follow the same PPE considerations for screeners who need to be within 6 feet of workers.
- Use separate buildings or rooms instead of physical barriers.
- Provide separate food and bathroom access.
- Restrict access to non-essential persons.
- Provide medical access and telemedicine for emergent illnesses.
- Provide transportation, if necessary, in a manner that does not expose others.
- Consult with a clinician or public health authority so they may monitor the situation and provide guidance on treatment and continued housing of all seafood processing workers.

Other information

Workers' rights

Section 11(c) ⬈ of the Occupational Safety and Health Act of 1970 ⬈ , 29 USC 660(c), prohibits employers from retaliating against workers for raising concerns about safety and health conditions. Additionally, OSHA's Whistleblower Protection Program ⬈ enforces the provisions of more than 20 industry-specific federal laws protecting employees from retaliation for raising or reporting concerns about hazards or violations of various airline, commercial motor carrier, consumer product, environmental, financial reform, food safety, health insurance reform, motor vehicle safety, nuclear, pipeline, public transportation agency, railroad, maritime, securities, and tax laws. OSHA encourages workers who suffer such retaliation to submit a complaint to OSHA ⬈ as soon as possible in order to file their complaint within the legal time limits, some of which may be as short as 30 days from the date they learned of or experienced retaliation. An employee can file a complaint with OSHA by visiting or calling ⬈ his or her local OSHA office; sending a written complaint via fax, mail, or email to the closest OSHA office; or filing a complaint online ⬈ . No particular form is required, and complaints may be submitted in any language.

OSHA provides recommendations intended to assist employers in creating workplaces that are free of retaliation and guidance to employers on how to properly respond to workers who may complain about workplace hazards or potential violations of federal laws. OSHA urges employers to review its publication Recommended Practices for Anti-Retaliation Programs ⬈ .

Footnotes

[1] OSHA regulates activities that are covered under the general industry (29 CFR part 1910) and shipyard employment (29 CFR part 1915) standards within three nautical miles of the coastline, except for the Gulf coast of Florida, Texas, and Puerto Rico, where the territorial waters extend for approximately nine nautical miles.

[2] CDC guidance does not recommend attempting to distinguish between close contact for those wearing cloth face coverings versus close contact for those not wearing cloth face coverings.

[3] Employers should evaluate the burdens and benefits of recording workers' temperatures or asking them to complete written questionnaires. These types of written products may become records that must be retained for the duration of the workers' employment plus 30 years. See OSHA's Access to Employee Exposure and Medical Records standard (29 CFR 1910.1020). If employers do not record workers' temperatures, they would not be records that must be retained. Thus, employers and workers may wish to avoid making a record of temperatures when workers' temperatures are checked.

Additional resources

- CDC COVID-19 website
- CDC Interim Guidance for Businesses and Employers to Plan and Respond to Coronavirus Disease 2019
- CDC Prepare your Small Business and Employees for the Effects of COVID-19
- CDC Tools for Cross-Cultural Communication and Language Access
- CDC and OSHA Guidance for Meat and Poultry Processing Workers and Employers
- CDC COVID-19 and Animals website
- CDC-INFO: 1-800-CDC-INFO (1-800-232-4636) | TTY: 1-888-232-6348
- FDA COVID-19 website [↗]
- NIOSH COVID-19 website
- OSHA COVID-19 website [↗]
- OSHA COVID-19 Standards [↗]
- U.S. Department of Labor, Employment and Training Administration, Office of Foreign Labor Certification, COVID-19, Frequently Asked Questions:
    - Round 1 [PDF] [↗]
    - Round 2 [PDF] [↗]
    - Round 3 [PDF] [↗]
- U.S. Department of Labor, Wage and Hour Division COVID-19 and the American Workplace [↗]
- U.S. Department of Labor and U.S. Department of and Health and Human Services' Guidance on Preparing Workplaces for COVID-19 [PDF] [↗]

Disclaimer

This guidance is not a standard or regulation, and it creates no new legal obligations. It contains recommendations as well as descriptions of mandatory safety and health standards. The recommendations are advisory in nature, informational in content, and are intended to assist employers in providing a safe and healthful workplace. The Occupational Safety and Health Act requires employers to comply with safety and health standards and regulations promulgated by OSHA or by a state with an OSHA-approved state plan. In addition, the Act's General Duty Clause, Section 5(a) (1), requires employers to provide their employees with a workplace free from recognized hazards likely to cause death or serious physical harm.

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