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Managing Coronavirus in the Food Industry

In response to the ongoing outbreak of novel coronavirus (COVID-19), many of our food industry clients and colleagues have sought counsel on how to prepare for evolving operational and employee issues, how to most appropriately respond as those issues arise, and what they can expect moving forward. Although the emerging COVID-19 outbreak may cause significant disruption to many companies, we can minimize the potential impact by planning, preparing, and collaborating to prevent the spread of illness.

We have been closely following the progression of the outbreak since its emergence. Several weeks ago, we published an article in Meatingplace, titled "[Coronavirus outbreak — is this the calm before the storm?](#)" In the article, we expressed concern that COVID-19 might cause significant economic and societal disruption, supply shortages, travel bans, quarantines and worker shortages both abroad and domestically. Now that COVID-19 has arrived in the U.S., companies domestically should be prepared for potential disruptions as well.

Background on Coronavirus and COVID-19

Coronaviruses are a family of zoonotic viruses (meaning transmitted between animals and humans), that can cause respiratory illness in humans. Severe Acute Respiratory Syndrome (SARS) is a strain of coronavirus originally transmitted to humans from civet cats. Middle East Respiratory Syndrome (MERS) is a coronavirus originally transmitted to humans from dromedary camels. Although the original source has not yet been confirmed with certainty, researchers reportedly believe COVID-19 may possibly have been transmitted to humans by an armadillo-like animal called a pangolin.

COVID-19 is a previously unknown strain of coronavirus capable of causing respiratory disease in humans. Researchers are still working to understand exactly all of the different ways in which COVID-19 transmission can occur. At a minimum, we know the virus can spread through aerosol transmission of droplets released when someone coughs, sneezes or exhales. According to CDC, transmission may be possible through contact with contaminated surfaces. Coronaviruses can also be efficiently inactivated within one minute by using disinfectants containing 62–71% ethanol, 0.5% hydrogen peroxide or 0.1% sodium hypochlorite. Thus, disinfecting surfaces, frequent handwashing, and using hand sanitizers can help decrease or prevent transmission.

What is FDA Doing?

FDA is employing a multi-faceted approach to the outbreak response, which includes actively facilitating efforts to diagnose, treat and prevent the disease, surveilling the medical product supply chain for potential shortages or disruptions, and helping to mitigate such impacts, and leveraging all available public health tools, including enforcement, against fraud. The FDA also maintains a [coronavirus information page](#), which is frequently updated with pertinent and developing information. Notably, just this morning, FDA issued seven (7) Warning Letters to companies selling products, such as holistic teas, making unsubstantiated claims that they have proven to be effective in combating previous coronavirus strains.

FDA is also currently focusing heavily on the medical implications of COVID-19, as opposed to potential impacts on the food industry or the food supply. With that said, many of the concerns pertaining to the medical supply chain are the same as those which apply to the food supply chain, at least in terms of supply chain integrity and availability. Given this congruity in supply chain dynamics, food industry stakeholders may be able to gain insight into emerging issues by monitoring FDA's pronouncements pertaining to medical supply chain regulation or disruption.

Can COVID-19 Affect Food?

Fortunately, CDC advises that COVID-19 appears to exhibit poor survivability, and there is currently "no evidence to support transmission of COVID-19 associated with food." With that said, according to a recent study, [Aerosol and surface stability of HCoV-19 \(SARS-CoV-2\) compared to SARS-CoV-1](#), COVID-19 virus may remain detectable in aerosols up to 3 hours post aerosolization, up to 4 hours on copper, up to 24 hours on cardboard and up to 2-3 days on plastic and stainless steel. CDC instructs, however, that "because of poor survivability of these coronaviruses on surfaces [generally], there is likely very low risk of spread from food products or packaging that are shipped over a period of days or weeks at ambient, refrigerated, or frozen temperatures." <https://www.cdc.gov/coronavirus/2019-ncov/faq.html>. Coronaviruses can also be efficiently inactivated within one minute by using disinfectants containing 62–71% ethanol, 0.5% hydrogen peroxide or 0.1% sodium hypochlorite. Thus, disinfecting surfaces, frequent handwashing, and using hand sanitizers can help decrease or prevent transmission.

The Australian Food Agency offers additional perspective as well. According to the agency, "previous experience with outbreaks of illness due to MERS-CoV, SARS-CoV and other respiratory viruses (*e.g.* avian influenza) suggest that ... [t]ransmission through food is unlikely and there is no evidence of this occurring with novel coronavirus to date, however investigations to identify the source of the outbreak, the extent of spread of the infection, and mode(s) of transmission are continuing." <https://www.foodstandards.gov.au/consumer/safety/Pages/NOVEL-CORONAVIRUS-AND-FOOD-SAFETY.aspx>

Finally, in a recent article published in Food Safety News, Donald W. Schaffner, extension specialist in food science and Distinguished Professor at Rutgers University, reported that, "while it is theoretically possible the virus could be transmitted via food, based on everything we know,

the risk of foodborne transmission is dramatically smaller — perhaps by millions of times — than the risk by airborne droplets.” <https://www.foodsafetynews.com/?s=coronavirus>

While there have not yet been any reports of foodborne transmission of COVID-19, because COVID-19 can remain viable on inanimate surfaces, we would recommend taking precautions for unpackaged exposed foods which may have been handled or affected by an employee or customer who has been infected by the virus and is also shedding.

What are Other Companies doing?

The CDC is continuing work on its outbreak response, and has issued [Interim Guidance for Businesses and Employers](#) specifically tailored to helping businesses plan and prepare for the expanding outbreak. All agree that effectively preparing for COVID-19 requires a multi-pronged approach that addresses all pertinent categories of risk. Generally speaking, all companies should consider the following measures:

1. Assessing, identifying and mitigating risks;
2. Enhancing employee sanitation measures;
3. Implementing less restrictive illness policies;
4. Reviewing and revising labor and revenue projections;
5. Evaluating supply-chain integrity; and
6. Developing contingency plans.

Even within those parameters, the specific actions companies are taking vary significantly depending upon their overall risk profile and the unique variables they face. Some companies whose operations are transnational, for instance, are suspending international employee travel. Companies that procure ingredients from international sources are developing contingency plans to mitigate the impact on supply chain, find alternative sources, and minimize disruptions and shortages.

Generally speaking, companies are implementing enhanced measures to prevent the spread of illness, such as educating employees, encouraging those who are able to do so to work from home, reducing employee crowding, prohibiting handshaking, encouraging handwashing and good hygienic practices, adding sanitizing stations, and suspending sick time restrictions.

What Specific Steps Can Companies Take to Prepare for the Outbreak?

If illnesses become widespread, your companies may be affected by infected employees, visitors or customers, and you may be affected by local and regional quarantines, which also could dramatically impact workflow.

We thus recommend developing contingency plans to deal with any COVID-19 related disruptions. The following bullet points, derived from existing FDA and CDC guidance, may serve to help guide your own planning, to protect your workforce, and ensure continuity of operations:

1. **Develop a plan.** Create a comprehensive outbreak response plan that is designed to prevent the spread of illness, respond to operational risks, and manage likely economic consequences. To maximize the effectiveness of the plan, we recommend that you consider the following:
 - **Identifying Risk:** Work closely with your colleagues to assess and identify risks;
 - **Developing a Response:** Work collaboratively, once those risks are identified, to develop the most appropriate response to each risk which may materialize; and
 - **Implementing triggers:** When any risks do materialize, set up triggers and procedures for activating and terminating the company's response plan and altering business operations (*e.g.*, possibly changing or closing operations in affected areas).
2. **Manage the flow of information.** Fear and misinformation can be just as damaging as the COVID-19 itself.
 - **Communications:** Develop protocols to communicate with the work force, including those not at the worksite. Establish a process to communicate information to employees and business partners on your infectious disease outbreak response plans and latest COVID-19 information. Anticipate employee fear, anxiety, rumors, and misinformation, and plan communications accordingly.
 - **Provide regular updates:** Provide regular, internally coordinated, factual updates about infection control, symptoms, and new and revised company policies.
3. **Prevent the spread of illness.** The best strategy companies can employ to protect themselves is to prevent the spread of illness.
 - **Reasonably restrict visitor access:**
 - Reasonably restricting visitor access can protect your workers and visitors.
 - **Sick or potentially sick employees:**
 - Emphasize staying home when sick, and place posters that encourage [staying home when sick](#). Waiving sick day limits and/or not counting sick days against employees is advisable.
 - Employees who have symptoms of acute respiratory illness should stay at home and not come to work until they are free of fever (100.4° F [37.8° C] or greater using an oral thermometer), signs of a fever, and any other symptoms

for at least 24 hours, without the use of fever-reducing or other symptom-altering medicines (e.g. cough suppressants). **Employees should be told to notify their supervisor and stay home if they are sick.**

- Please note that monitoring workers' temperatures can be invasive. According to EEOC guidance, taking temperatures is a violation of law in the absence of a CDC or public health authority pandemic declaration. We thus generally advise against this measure, although agree that, if coupled with a comprehensive plan which involves coordination with public health authorities and healthcare providers, it could be an effective strategy.
- CDC recommends that employees who are noticed to have acute respiratory illness symptoms (i.e. cough, shortness of breath) upon arrival to work or become sick during the day should be separated from other employees and be sent home immediately. Sick employees should cover their noses and mouths with a tissue when coughing or sneezing (or an elbow or shoulder if no tissue is available).
- Ensure that your sick leave policies are flexible and consistent with public health guidance and that employees are aware of these policies.
- Talk with companies that provide your business with contract or temporary employees about the importance of sick employees staying home and encourage them to develop non-punitive leave policies.
- Do not require a healthcare provider's note for employees who are sick with acute respiratory illness to validate their illness or to return to work, as healthcare provider offices and medical facilities may be extremely overloaded and not able to provide such documentation in a timely way
- Employers should maintain flexible policies that permit employees to stay home to care for a sick family member. Employers should be aware that more employees may need to stay at home to care for sick children or other sick family members than is usual.
 - Moreover, in some communities, early childhood programs and K-12 schools may be dismissed, particularly if COVID-19 worsens. Determine how to operate if absenteeism spikes from increases in employees who stay home to care for sick family members, and those who must stay home to watch their children if dismissed from school.
 - Businesses and other employers should prepare to institute flexible workplace and leave policies for these employees.

- **Require respiratory etiquette and hand hygiene by all employees:**
 - Emphasize appropriate [cough and sneeze etiquette](#) and [hand hygiene](#) with all employees, and post information in workplace areas where it is likely to be seen and read.
 - Provide tissues and no-touch disposal receptacles for use by employees. Consider providing sanitation stations throughout the workplace.
 - Instruct employees to clean their hands often with an alcohol-based hand sanitizer that contains at least 60-95% alcohol, or wash their hands with soap and water for at least 20 seconds. Soap and water should be used preferentially if hands are visibly dirty.
 - Provide soap and water and alcohol-based hand rubs in the workplace. Ensure that adequate supplies are maintained. Place hand rubs in multiple locations or in conference rooms to encourage hand hygiene.

- **Perform routine environmental cleaning:**
 - Ensure routine cleaning of all frequently touched surfaces in the workplace, such as workstations, countertops, and doorknobs. Use the cleaning agents that are usually used in these areas and follow the directions on the label.
 - Provide disposable wipes so that commonly used surfaces (for example, doorknobs, keyboards, remote controls, desks) can be wiped down by employees before each use.

- **Advise travelling employees to take the following steps:**
 - Minimize nonessential employee travel.
 - Advise employees to check themselves for symptoms of [acute respiratory illness](#) before starting travel, and to notify their supervisor and stay home if they are sick.
 - Ensure employees who become sick while traveling understand that they should notify their supervisor, and should promptly call a healthcare provider for advice if needed.
 - Check the [CDC's Traveler's Health Notices](#) for the latest guidance and recommendations for each country to which employees will travel. Specific travel information for travelers going to and returning from China and other

severely impacted countries, and information for aircrew, can be found at on the [CDC website](#).

4. Coordinate with Public Health Agencies.

- Local conditions will influence the decisions that public health officials make regarding community-level strategies. As a result, employers should take the time now to learn about plans in place in each community where they have a business.
- In turn, if you have questions about COVID-19 cases in your community, including concerns about specific exposures, you should consult your local health department for additional information and guidance.
- Additionally, if your place of business is affected by individuals suspected or confirmed to have been infected with COVID-19, obtain immediate advice and direction from your state and local health authorities. Overall communication strategies and response, in many cases, are developed and directed by the state and local health authorities. In some cases, it may be counterproductive to execute a response or issue communications which are inconsistent with existing state and local strategies. Remember, the local health authorities are the experts in the area, and you should consider or rely upon their counsel and advice when such questions or issues arise.

5. Supply Chain Management.

- Identify essential business functions, essential jobs or roles, and critical elements within your supply chains (*e.g.*, raw materials, suppliers, subcontractor services/products, and logistics) required to maintain business operations. Plan for how your business will operate if there is increasing absenteeism or these supply chains are interrupted or are no longer available.
 - Assess your essential functions and the reliance that others have on your services or products. Be prepared to change your business practices if needed to maintain critical operations (*e.g.*, identify alternative suppliers, prioritize customers, or temporarily suspend some of your operations if needed).
- Stockpiling a reasonable volume of non-perishable inventory may minimize the impacts of future shortages or travel restrictions, in the event they occur. This of course requires a careful cost-benefit analysis. Keep in mind that while travel restrictions might affect your suppliers' ability to send you ingredients, such restrictions could also prevent you from shipping products to others.
 - Boosting production today as a hedge against future labor shortages in the future may prevent or minimize fulfillment delays.

- Carefully evaluate the impacts of global market slowdowns, including reduced orders, missed sales projections, supply chain stoppages, etc.
- Review sales, production and labor projections, planning, etc., to identify likely disruptions or other ways to mitigate any losses.

COVID-19 will likely continue to present significant challenges in the days to come. But it is not something to fear, and things will surely soon return to normal. As with all other unexpected events, like snowstorms, earthquakes, recalls, or other business disruptions, adequate planning and preparation can greatly reduce the negative impacts. This situation will likely be no different.

Of course, as always, we stand ready and eager to assist you as needed with any planning and preparation for whatever may come.

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