



# AFDO Recommendations For COVID-19 Response for State Agencies

## Conducting Routine Inspections During COVID-19 Pandemic

The Association of Food and Drug Officials strongly recommends that state agencies responsible for regulating manufactured foods suspend conducting routine food inspections during the COVID-19 public health emergency. This recommendation does not include the regulation of meat, poultry, and processed egg products.

It is our recommendation that state agencies continue conducting certain high priority, “for cause” inspections such as those based upon consumer complaints with associated injuries or illness, food-related illness investigations, and product recalls.

Why should state regulatory agencies suspend conducting routine food manufacturing facility inspections?

- CDC guidelines indicate that person-to-person contact presents the highest risk of transmission of the virus that causes COVID-19. Federal and state guidelines have called for social distancing measures to reduce the risk of exposure with infected individuals and to stop the spread of the virus in communities.
- The Federal government and many state governments have issued travel restrictions to slow the spread of COVID-19. State inspectors travel to multiple locations to facilitate inspections. State personnel must travel to gas stations, convenience stores, restaurants, manufacturing facilities, hospitals, and may require overnight lodging. State inspectors that continue these activities may inadvertently spread the virus that causes COVID-19.
- Food manufacturing and processing facilities are identified as critical infrastructure and the employees working in these facilities as essential workers during this pandemic. Exposing these essential workers to other individuals, including State inspectors, adds unnecessary risk.
- Social distancing is often difficult to maintain in facilities that manufacture food; the inspector and facility staff may be unnecessarily exposed to one another increasing the potential for virus transmission from asymptomatic persons. It is necessary to reduce to the fullest extent possible transmission of this virus among essential workers because if this is not done the workforce may be even further reduced in situations where staffing is already strained.
- Food manufacturers are responsible for manufacturing safe food. They do this by developing and implementing robust food safety systems. These food safety systems include routine monitoring and conducting verification activities which serve to assure controls that have been put in place are working. These systems are implemented every day the facility operates. A delay of an inspection by weeks or even months does not eliminate the food manufacturers responsibility for manufacturing safe food.
- Current scientific evidence does not support food or food packaging as potential carrier of the virus.



- There is increasing concern that access to Personal Protective Equipment (PPE) may be difficult as many supplies are being diverted to healthcare and first responders. State inspectors may not have access to the necessary PPE.

### **Inspectors Responding to a Firm's Health Related Questions During the COVID-19 Pandemic**

The Association of Food and Drug Officials strongly recommends that State inspectors conducting “for cause” type inspection activities **verbally** respond to a facility’s health related questions prior to entry at the firm. Manufacturing facilities may ask questions such as:

- Have you been diagnosed with or otherwise tested positive for COVID-19?
- Have you recently displayed any symptoms consistent with COVID-19, (e.g., cough, fever, shortness of breath);
- Have you recently traveled from an area with heightened community transmission; or
- Have you been in close contact with someone with COVID-19 or showing symptoms of COVID-19?

Inspectors should be self-monitoring and should **NOT** be performing inspections if they have any symptoms of COVID-19 or have any known close contact to a person with COVID-19. If an inspector has been in close contact with COVID-19, they should stay home and isolate for at least 14 days before returning to work.

Why should inspectors verbally respond to these types of health-related questions?

- It is generally acceptable for food facilities to screen visitors before entering a facility. Companies are presently being encouraged to distribute an email, or other communication, to regular visitors, suppliers, and delivery companies explaining their COVID-19 management policy and asking that no persons enter their building unless their visit is “essential.” Companies are also be encouraged to communicate with the appropriate regulatory agencies as well. Food facilities are generally requiring that non-essential visitations to facilities be minimized and postponed
- The manufacturing facility also has a responsibility to screen its own employees for communicable disease and to protect its employees from possible exposure to communicable disease from visitors. This is especially important now given food manufacturers are considered critical infrastructure and its employees as essential workers.
- The FDA and USDA-FSIS have issued similar guidance about answering firm’s COVID-19 related questions to personnel conducting for cause inspections.
- As part of biosecurity in this time of a pandemic, regulators should expect a firm to ask these types of questions.

### **Requiring Gloves and Masks for All Employees in Food Manufacturing Facilities and Establishments During the COVID-19 Pandemic**

The Association of Food and Drug Officials strongly recommends state and local public health agencies avoid requiring those that work in food manufacturing facilities to wear personal



protective equipment such as masks and even gloves when workers are typically not required to do so. The CDC and FDA recommends that food workers wear cloth face coverings. Detailed information about the usage is included below.

Why should requiring PPE equipment such as masks and gloves be avoided for workers that are not otherwise required to use these?

- CDC and FDA guidance are not recommending such equipment for those staff not required to use such equipment for other reasons (such as to avoid bare hand contact with ready to eat foods). <https://www.fda.gov/food/food-safety-during-emergencies/food-safety-and-coronavirus-disease-2019-covid-19>
- Masks are becoming increasingly less available for essential workers other than first responders and healthcare professionals and even gloves are being prioritized for first responders and healthcare professionals

### **From the US Food and Drug Administration's Food Safety and Coronavirus 2019 FAQ**

<https://www.fda.gov/food/food-safety-during-emergencies/food-safety-and-coronavirus-disease-2019-covid-19#5e8740b824328>

#### **Should employees in retail food and food production settings wear face coverings to prevent exposure to COVID-19?**

On April 3, the CDC released an updated [recommendation](#) regarding the use of cloth face coverings to help slow the spread of COVID-19. CDC recommends the use of simple cloth face coverings as a voluntary public health measure in public settings where other social distancing measures are difficult to maintain (e.g., grocery stores and pharmacies).

For workers on farms, and in food production, processing, and retail settings who do not typically wear masks as part of their jobs, consider the following if you choose to use a cloth face covering to slow the spread of COVID-19.

- Maintain face coverings in accordance with parameters in [FDA's Model Food Code](#) sections 4-801.11 Clean Linens and 4.802.11 Specifications.
- Launder reusable face coverings before each daily use.
- CDC also has [additional information on the use of face coverings](#), including washing instructions and information on how to make homemade face covers.

NOTE: The cloth face coverings recommended by CDC are not surgical masks or N-95 respirators. Those are critical supplies that must continue to be reserved for healthcare workers and other medical first responders, as recommended by current CDC guidance.

#### **How and when should workers in food retail and processing wear gloves during a pandemic? (Posted April 1, 2020)**



- FDA's Food Code recommendations for hand washing and glove use in food service and retail food stores have not changed as a result of the pandemic. ([Food Code 2017](#) Section 2-301.11). Per the FDA Food Code: with limited exceptions, employees may not contact exposed, ready-to-eat foods with their bare hands and shall use suitable utensils such as deli tissue, spatulas, tongs, single use-gloves, or dispensing equipment ([Food Code 2017](#) Section 3-301.11). Gloves are not a substitute for hand washing or hand hygiene.
- If your task requires direct contact with ready-to-eat food, wash your hands and the exposed portions of your arms for 20 seconds prior to donning gloves and before touching food or food-contact surfaces. Wash your hands immediately after removing gloves.

### **Should employees in retail food and food production settings wear face coverings to prevent exposure to COVID-19? (Posted April 4, 2020)**

- On April 3, the CDC released an updated recommendation regarding the use of cloth face coverings to help slow the spread of COVID-19. CDC recommends the use of simple cloth face coverings as a voluntary public health measure in public settings where other social distancing measures are difficult to maintain (e.g., grocery stores and pharmacies).
- For workers on farms, and in food production, processing, and retail settings who do not typically wear masks as part of their jobs, consider the following if you choose to use a cloth face covering to slow the spread of COVID-19:
  - Maintain face coverings in accordance with parameters in FDA's Model Food Code sections 4-801.11 Clean Linens and 4.802.11 Specifications.
  - Launder reusable face coverings before each daily use.
  - CDC also has additional information on the use of face coverings, including washing instructions and information on how to make homemade face covers.
- NOTE: The cloth face coverings recommended by CDC are not surgical masks or N-95 respirators. Those are critical supplies that must continue to be reserved for healthcare workers and other medical first responders, as recommended by current CDC guidance.

**Relevant information can be found on the Association of Food and Drug Officials website: <http://www.afdo.org/coronavirus-resources> including links to industry best practices documents.**

**Last update date: April 5, 2020**