
PREPARE NOW FOR ALERT LEVEL 3 - RESTRICT

New Zealand will hear on the 20th of April whether we will move out of Alert Level 4 on the 23rd. While this is only two days of 'official' warning, businesses can begin getting ready now. The following provides guidance on the things to consider for operating under safe practice in a manufacturing environment. As the situation evolves it may be that New Zealand, or specific regions, moves between Levels 2, 3 and 4 several times over the coming year.

It is expected that the Government will provide more formal guidance, or requirements, before we move out of Level 4. Areas of uncertainty below have been highlighted to the Government and will hopefully be clarified in the formal Safe Practice Protocols.

The Safe Practice Protocol is expected to be in three parts. When carrying out your health & safety risk assessment for covid-19 these overarching concepts should be considered:

- FIND: Identify and intercept potential sources of infection before they enter your site.
- CONTAIN: Ensure that any undetected source of infection on your site cannot infect others.
- CONTROL: Minimise the risk of cross-infection from shared surfaces.

Disclaimer: The following provides specific advice for preparing for safe practice in your manufacturing plant. This is not definitive and may differ to the formal Safe Practice Protocols we are expecting from Government. The advice also does not cross into the areas of wage subsidies or employee management. Please bear these things in mind during your planning for operations under Alert Level 3.

HEALTH & SAFETY

The spread of Covid-19 has created a new health & safety risk that employers must manage. WorkSafe has indicated (https://bit.ly/WS_C19) that they expect all businesses to:

- Follow the latest Ministry of Health advice about preventing Covid-19 and to promote good hygiene practices at work.
- Identify and manage any emerging risks brought about by the Covid-19 situation (i.e. assessing the risks, and then implementing the hierarchy of controls, so far as is reasonably practicable).

WorkSafe also expects workers to take care of their own health and safety, and the health and safety of others, while at work. This means following and cooperating with any reasonable health and safety instructions, policies and procedures they're given.

As such, it is recommended that you view the implementation and enforcement of any Safe Practice Protocols through this health and safety lens. As you will already have practices in place, this will make it easier to explain the importance of the measures to staff and to handle any subsequent disciplinary action required.

The Health & Safety at Work Act 2015 also requires businesses to ensure, as far as is reasonably practicable, the provision of any information, training, instruction, or supervision that is necessary to protect all persons from risks to their health and safety arising from work carried out as part of the conduct of the business or undertaking.

In other words – make sure you train your staff on the measures you put in place to protect against Covid-19. Make sure you keep adequate records of this training in case you are audited.

DAILY CHECKS

The first measure to preventing transmission of the virus is ensuring it doesn't enter your site.

Required:

- Staff who are sick must not come to work. Consider what checks you will put in place to ensure no symptomatic individuals enter your work environment.
- Perform an outside-of-work risk assessment for each staff member. Ensure procedures for identifying those who have travelled to another country, or who have been identified as close contacts of probable or confirmed cases. Those identified should self-quarantine and not come to work for 14 days. Include assessments covering the first day back and ongoing.
- Where a member of a work team gets covid-19, quarantine the whole team (if considered close contacts).
- Those who can work from home must continue to do so.

Other Potential Measures:

- Temperature Checks: Measure employee's temperatures on arrival at work each day to ensure no fever. Note - Forehead thermometers are in very short supply at present. If you buy ear thermometers, ensure you purchase additional sleeves to prevent cross-contamination. It's possible that sanitisation of device between every employee should also be carried out to avoid cross-contamination.
- Daily questions to, or declaration by, employees as to the Covid-19 symptoms; fever, cough, shortness of breath, sore throat, loss of smell and taste).
- Consider your actions if an employee, or close contact of an employee, has been tested but does not yet have results. Review your options both from a health & safety perspective and a business continuity perspective.
- Plan action for employees with repeated coughing or sneezing that they state is not related to Covid-19. As this may be a sign of hay-fever, asthma etc, it is important to plan in advance what your course of action should be. This could include requiring a covid-19 test, asking for a medical certificate from GP etc.

TRANSPORT TO/FROM WORK

Transport to and from work is an important consideration in preventing Covid-19 in your workplace. For example, car-pooling of people from multiple 'bubbles' could be a risk due to lack of physical distancing.

Potential Measures:

- Identify how all employees are getting to and from work and assess risks to individuals and your business continuity due to those methods of travel.
- Provide guidance to employees regarding mitigation measures during travel:
 - Public Transport: https://bit.ly/MoT_PubTrans
 - Taxi or Rideshare: https://bit.ly/MoT_Taxi-Ride-Share

Note: Public transport for essential workers has been available throughout the Level 4 lockdown. It is our recommendation that you do not restrict use of public transport unless the employer covers the additional expense for the alternative method of travel (i.e. taxi or Uber). Otherwise you may garner negative attention from the Unions or potentially may create a situation ripe for personal grievance.

PHYSICAL DISTANCING

Physical distancing of 2m or more between employees is required. In some cases, a distance less than 2m, but greater than 1m, may be acceptable but special measures must be put in place to mitigate the risk of transmission.

Required:

- 2m or more distance between employees at all times, unless special mitigation measures are put in place.
- If <2m distance, assess which additional mitigation measures will protect your employees from transmission of the virus. Measures may include, but are not limited to, screens between employees, PPE, facing away from each other. A minimum distance of 1m must be maintained even with these special mitigation measures in place.
- Avoid standing face-to-face, even when keeping minimum 2m distance. Stand side-by-side instead.
- As much as possible, ensure that people remain within their designated 'bubble' within the workplace (dependent on size of operation).
 - Make each team a 'bubble' and minimise or eliminate crossover of employees between each team.
 - Time rest and meal breaks so that teams are not congregating in break areas at the same time.
 - If possible, create separate entrance and exit zones, and stagger changeover times so that teams do not mix in changing rooms or on the line during shift change.

Other Potential Measures:

- Provide floor markings showing safe (>2m) distance between workstations.
- Break factory into sections with each work team 'bubble' staying within their assigned space (workstations, rest areas and amenities).
- Establish fixed work teams so that you minimise mixing between staff and have a 'replacement' team if a team needs to be quarantined. This can be done through running multiple shifts, teams working specific days only etc. Some gaps in pay may eventuate in this scenario but it is an option that we recommend considering overall business continuity vs total shutdown.
- Change shift times so there is a minimum gap between shifts to avoid cross-over of teams and to allow for cleaning.
- Create walkways to ensure workers are separated as much as possible when moving through work areas.
- Establish protocols for communication and activity during unplanned maintenance (e.g. breakdowns, trouble-shooting processing issues etc.) to ensure 2m distance is maintained at all times.
- Ensure communication is possible without violating 2m rule in noisy environments (e.g. move to quiet area)
- For assembly operations, where stations are normally closer than 2m, get a single employee to complete more than one assembly action. Maintaining physical distancing is more important than achieving takt time during this situation (takt time = average time from start of production of one unit and start of production of the next unit).

FACTORY MOVEMENTS

It is possible the Government may impose measures to shut an entire site if an employee is found to have Covid-19, unless that business can definitively show the ability to contact trace (i.e. show that only part of the workforce were close contacts of the infected individual). There may be some advantage to being able to show employee movements and interactions. Minimising transmission points is also important here.

Potential Measures:

- Activity tracking for all employees (i.e. team and shift worked, specific areas of plant worked in, cross-over with other teams such as stores, maintenance, deliveries, sales etc).
- Many factories have stores-people who move around the whole plant as they deliver raw materials or components to the line. Put measures in place to minimise or eliminate this. Depending on the size of your plant a number of drop-points could be created for stores to deliver to. Line staff can then pick up items from these drop-points without person-to-person interaction.
- Identify other roles who may move around the whole plant (e.g. Quality, Maintenance). Determine methods for minimising this movement or for managing associated risks. If one of these people were to become infected this may mean a 14-day closure of the entire plant if their movements are not minimised.

SURFACE CONTACT POINTS

Covid-19 has been shown to last up to 72 hours on surfaces. To minimise the number of transmission points, review your business for contact surfaces that are not required.

Potential Measures:

- Identify work tasks where PPE may be shared. This may include items such as safety glasses, high-vis vests, protective clothing and gloves, welding aprons and helmets. Review procedures for cleaning and disinfecting this equipment between users. Where possible minimise the sharing of this equipment and/or provide employees with personal PPE.
- Review internal doors and determine which are required for fire-safety and/or privacy. Where a door is not required consider removing it or wedging it permanently open. This eliminates 2 points of contact per door.
- Where doors cannot be eliminated as contact points consider whether hands-free opening can be implemented. There are numerous methods for doing this appearing online, including a range of free 3D printable options.
- Review storage spaces on the line such as cupboards and drawers. Remove cupboard doors and move frequently used items out of drawers into easily accessible space. (Ensure health and safety requirements for hazardous materials etc. are maintained).
- Ensure staff have their own individual items of stationery or commonly used tools (i.e. pens, markers, box-openers etc.) so that these items are not points of shared contact.
- Remove lids on rubbish bins or replace with bins utilising a foot-opening mechanism

CLEANING

Cleaning of shared surfaces is very important to prevent transmission of the virus.

Required:

- Review workplace to identify all shared work surfaces. This may include:
 - Benches, tables, tops of cupboards
 - Handles on doors, drawers and appliances
 - Touch screens and control panels on equipment
 - Doors and access points for production equipment
 - Frequently used production tools, jigs or quality equipment
 - Shared devices (computers, tablets, phones etc) and accessories (mouse, keyboard)
 - Light switches
 - Bathroom surfaces including taps, manual feed knobs on hand-towel dispensers, sanitary bins.
 - Break-room surfaces including chairs, tables, benches etc.
- Clean shared work surfaces frequently.
 - If surface looks visibly dirty clean it first. It is best to use a detergent for this which has the added bonus of likely deactivating coronaviruses.
 - If not using a detergent for cleaning disinfect the surface using an antiviral disinfectant and make sure you follow the instructions. Surfaces will need about 10 seconds soaking in disinfectant for it to do its job.
 - (Check out [How-to-get-rid-of-covid-19-from-surfaces-the-right-way/](#) by Dr Siouxsie Wiles)

Other Potential Measures:

- Use a detailed / itemised checklist and keep records of cleaning activity. Consider displaying activity so employees can see last time items cleaned (e.g. as done in many airport and mall toilets)
- Consider how you will carry out the regular cleaning. Options include, but are not limited to:
 - Employ additional cleaner(s) to carry out cleaning activities.
 - Assign specific staff to carry out cleaning activities.
 - Assign all employees responsibility for cleaning their work areas at the start of each shift and at other defined timeframes within the workday.

PERSONAL HYGIENE

One of the most effective methods of preventing transmission of the virus is handwashing. Ensure employees understand the basics.

Required:

- 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.
- 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 and wash hands). A variety of posters are freely available help remind employees of critical measures:
 - http://bit.ly/Protect_Poster_Covid-19
 - <https://www.mpp.govt.nz/assets/Uploads/Hand-washing-poster2.pdf>
 - <https://covid19.govt.nz/resources/posters/>

PERSONAL PROTECTIVE EQUIPMENT

At present the Ministry of Health is not recommending face masks for workers outside of a health setting. Specific advice can be found here: https://bit.ly/MoH_PPE_Non-Health. Part of the reason for this will relate to the fact that there can be issues with safe use and removal of PPE, face masks in particular. However, you will need to carry out a risk assessment on this for your business, particularly if you have employees specifically asking for masks.

Required:

- Assess the various situations your employees are in and determine if PPE is required or not. Where physical distancing is less than 2m the use of additional PPE may be appropriate (alternatively physical screens can be used).
- Where face masks or shields are provided you must ensure staff are using them correctly. Ensure the proper training is carried out and perform subsequent checks. This is applicable both for employer provided PPE and employees bringing their own masks/shields.

Other Potential Measures:

- Disposable gloves may be appropriate, particularly where supply chains are less than 72 hours.
- Determine your response to use of face masks where they are not deemed to be required.

Note: Where face masks are not required but an employee feels more comfortable wearing one, we recommend working with them on this. Ensure adequate training is provided so they are aware of the risks of accidental cross-contamination from use of face masks. You may find this helps them feel more comfortable with not wearing one. Either way, you know you have fulfilled your health & safety requirements adequately.

DELIVERIES / SALES

Delivery of goods to site, or pickup of items by couriers/customers is a potential point of virus transmission.

Required:

- Process to receipt deliveries that ensures safe physical distancing is maintained.
- Determine Health & Safety practices required for employees carrying out deliveries to customers. Both PCBUs are required to ensure health and safety of both parties at the cross-over point. I.e. You need to be certain that your employee is protected from Covid-19 transmission at the customer's end (safe physical distancing etc).

Other Potential Measures:

- Site or building closed to all external parties. Site manager decides who is allowed on site (contractors, etc) during their shift.
- Implement process for contactless approval of deliveries.
- Implement 'no pickup' policy for Level 3. Goods to be delivered by Logistics company or businesses own vehicles.
- Require suppliers to immediately notify you if a Covid-19 case is identified in their operations/supply chain that could impact your business.
- Notify customers immediately if Covid-19 case is identified within own operations. Include information on mitigation measures and impacts.

- Review transmission risks in supply chain, particularly if shorter than 72 hours (longest identified time for virus detection on surfaces). Determine reasonable mitigation measures to prevent transmission to staff if components/materials delivered were carrying virus.

VULNERABLE PEOPLE

You are likely to have employees who are more at risk from Covid-19, or those who are living with others at high risk. These employees, and their families, must be considered carefully during this situation.

Required:

- Identify all employees who fall within the 'at-risk group' for Covid-19. Discuss options for mitigating risks with each of these employees.

Other Potential Measures:

- Identify employees who are living with an individual in the 'at-risk group' for covid-19. Discuss safety measures for protecting these people with employee and ensure they are comfortable with arrangements.

At present essential workers in the 'at-risk group', or with household members in this group, qualify for the *Essential Workers Leave Payment Scheme*. To date there has been no information regarding support for this group of employees under Alert Level 3. This question will be put to Government and we hope to see clarity on this soon.

At-Risk Groups¹:

- Those over 70: Older people, in particular those with underlying health issues, including respiratory issues, are more vulnerable to Covid-19.
- Those with existing underlying medical conditions, especially where these are not well controlled. These include:
 - Serious respiratory disease such as chronic lung disease or moderate to severe asthma.
 - Serious heart conditions
 - Immunocompromised conditions (see below)
 - Severe obesity (BMI >40)
 - Diabetes
 - Chronic kidney disease
 - People undergoing dialysis
 - Liver disease
- Pregnant women: health experts do not yet know if pregnant women are impacted by Covid-19 in the same way as other people. However, pregnant women experience changes in their bodies that may increase their risk from some infections
- Many conditions can cause a person to be immunocompromised, including:
 - Cancer treatment
 - Smoking-related illness
 - Bone marrow or organ transplantation
 - Haematologic neoplasms (e.g. leukaemia, lymphoma, myelodysplastic syndrome)
 - Immune deficiencies
 - Poorly controlled HIV or AIDS
 - Prolonged used of corticosteroids and other immune weakening medications such as disease-modifying anti-rheumatic drugs.

¹ <https://covid19.govt.nz/individuals-and-households/health-and-wellbeing/vulnerable-people/>