# COVID 19 - GUIDANCE FOR DAIRY MANUFACTURERS

Last updated: 13th January 2022

## Summary Checklist

### Preparing for COVID

| | | Y/N |
|---|---|---|
| 1. | Monitor and understand the Statutory requirements relevant to your site | |
| 2. | Establish a COVID management team | |
| 3. | Review and update your site's COVIDsafe plan to suit local circumstances/risks | |
| 4. | Review options for implementing your COVIDsafe plan, focusing on issues that impact on the safety of staff and continuity of operations | |
| 5. | Routinely conduct COVID exposure exercises (simulation) to test the plan and apply improvements | |

### Responding to and re-opening from a COVID incident

| | | Y/N |
|---|---|---|
| 1. | Isolate the infected person / close contact | |
| 2. | Notify the public health authority (if required) | |
| 3. | Assess the risks posed by conducting a site risk assessment | |
| 4. | Submit the risk assessment and close contact list to the public health authority (if required) | |
| 5. | Notify workers, suppliers or others that may have been exposed and inform them of relevant testing and isolation requirements | |
| 6. | Notify relevant WorkSafe authority (if required) | |
| 7. | Notify relevant State/Territory food safety authority and export regulator (if relevant) | |
| 8. | Consider vacating the areas visited by the COVID case (as per risk assessment) | |
| 9. | Deep clean the site / areas (if relevant) | |
| 10. | Re-open / re-commence operations (need approval in some jurisdictions) | |
| 11. | Review and update your site's COVIDsafe plan | |

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# Introduction:

## Context:

COVID 19 is now well established in most States and is expected to become widespread in the rest of Australia over the following months. Governments are now using public health restrictions to manage the demands placed on hospitals, whilst attempting to limit their impact on supply chains and the broader economy. Most recently, the emergence of the highly transmissible Omicron variant has stretched resources and placed significant pressures on supply chains as workers have been furloughed after being infected or exposed to COVID.

With greater than 90% of the Australian adult population now vaccinated (2 doses), most States and Territories are now focussing on providing booster shots (3$^{rd}$ dose) for vulnerable adults and essential workers, while removing restrictions for the general public. WA is taking a more cautious approach, with policies to maintain COVID-freedom in place until early February 2022.

At this point in time most businesses are still subject to specific COVID requirements or restrictions, which vary significantly across jurisdictions. As COVID cases rise, businesses are being required to take responsibility for many of the aspects of the public health response that were previously conducted by Government, and are also being asked to prioritise essential services and food supply chains.

## Scope of guidance

This information has been collated for Australian dairy manufacturing businesses involved in processing, manufacturing and storing of dairy products for both domestic and export markets.

It serves as guidance only and includes information for both planning for, and responding to and re-opening from a COVID 19 incident. It is based on information provided by public health, other agencies and manufacturing companies that have had experiences with COVID. Where possible we have provided a national position, with state-specific differences acknowledged.

State and Territory health authorities are the lead agencies in human disease pandemics and have the legislative basis to apply controls. State and Territory food safety authorities, Commonwealth dairy export authorities and Worksafe agencies may also have specific requirements for dairy manufacturers related to COVID. **Individuals and businesses must obey the law as it applies in their jurisdiction. The law prevails if any inconsistency between the law and this guidance is identified.**

This **guidance provides links to relevant information** (rather than reproduces it) acknowledging that government requirements change frequently in the different jurisdictions, and new information becomes available as our government and industry response to COVID matures.

## Key industry contacts

| | |
|---|---|
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# PART 1 - Preparing for COVID

## Dairy manufacturing summary checklist – Preparing for COVID

| 1. | Monitor and understand the Statutory requirements relevant to your site | Y/N |
|----|------|-----|
| 2. | Establish a COVID management team | Y/N |
| 3. | Review and update your site's COVIDsafe plan to suit local circumstances/risks | Y/N |
| 4. | Review options for implementing your COVIDsafe plan, focusing on issues that impact on the safety of staff and continuity of operations | Y/N |
| 5. | Routinely conduct COVID exposure exercises (simulation) to test the plan and apply improvements | Y/N |

## Aim

To plan and implement processes to minimise exposure risks and limit the impact of any exposure in dairy manufacturing sites.

## Statutory requirements in preparing for COVID

### Relevant definitions

- Authorised/essential worker – dairy manufacturing staff and staff of relevant support services (e.g. cleaners, chemical suppliers, etc.) are generally permitted to attend work sites and perform work in any areas subject to lockdown, if they have been vaccinated. Food logistics and manufacturing staff are also included in the 'isolation exemption' agreed nationally and legislated in some jurisdictions in Jan 2022.

### State and Territory Government Public Health requirements (for businesses)

COVID requirements for dairy manufacturing businesses differ between jurisdictions and are subject to frequent change. Examples include: the wearing of masks indoors; application of QR codes; COVIDsafe plans; staff vaccination requirements and/or appointing a site COVID supervisor. Monitor the current public health requirements relevant to your site using the links below:

| VIC | NSW | QLD | TAS |
|-----|-----|-----|-----|
| SA | WA | ACT | NT |

### Check for updates on local requirements and restrictions

Specific restrictions applied to specific workers, regions or local government areas may also be relevant to your staff or operations. Look for recent updates here:

| VIC | NSW | QLD | TAS |
|-----|-----|-----|-----|
| SA | WA | ACT | NT |

### Consider WHS requirements

COVID guidance is provided by Safe Work Australia with links to specific State and Territory WorkSafe agencies below:

| VIC | NSW | QLD | TAS |
|-----|-----|-----|-----|
| SA | WA | ACT | NT |

### Consider food safety requirements

State and Territory food safety regulators (SRAs) are available to work with dairy manufacturers to assess and approve changes to the site's food safety program, if changes are required to operating procedures to meet the site's COVIDsafe plan. However, your State and Territory health authority is your first point of contact as the lead agency on COVID related matters.

### Consider export requirements

The Department of Agriculture, Water and the Environment (or SRAs working on their behalf) are available to work with export registered dairy manufacturers to assess and approve any changes to the site's approved arrangement that are necessary to meet the site's COVIDsafe plan. Generally this would only apply to changes to operating processes or approved control points. Note that changes to importing country requirements may also be relevant. A summary of changes to export arrangements can be found here.

### Legal advice may be required for interpretation

Dairy manufacturing businesses are responsible for seeking their own legal advice regarding specific issues, however some agencies have provided guidance on issues common to the operation of businesses. Note that requirements vary between jurisdictions, so check *State and Territory Government Public Health requirements (for businesses).*

| Mandating vaccination of staff (including FAQ) | VIC   NSW   QLD   TAS   SA   WA   ACT   NT<br>Australian FairWork Ombudsman<br>SafeWork Australia<br>Business.gov.au |
|---|---|
| Restricting entry to unvaccinated staff, contractors | VIC   NSW   WA |
| Privacy / requesting proof of vaccination status | VIC   NSW   WA   TAS |
| Continued employment of staff who choose not to be vaccinated | VIC   NSW   WA<br>Australian FairWork Ombudsman |
| Using COVID Rapid Antigen Tests | Australian government<br>TGA<br>NSW   VIC |
| Special requirements for dairy manufacturing & distribution supply chains | VIC (warehousing, wholesaling, postal and distribution - excludes chilled stores & distribution)<br>VIC (manufacturing including food) |
| Availability of COVID-exposed staff (critical worker close contact exemption) | VIC   NSW   QLD<br>National guidance |

## COVIDsafe plan

Dairy manufacturing businesses in most jurisdictions are required to have a documented COVIDsafe plan (also called a COVID safety plan) detailing the procedures in place to minimise the risks of COVID to the business, its employees and so the public health of the wider community. Links to business templates/resources are included in table below, including national interim guidance (*AHPPC permissions & restrictions for workers in food & grocery supply*) and a specific template for food

manufacturing businesses from NSW. State and Territory health authorities are willing to work with manufacturers to ensure their COVIDsafe plans are complete. In Victoria, Senior Medical Advisors as part of the Occupational Physicians Group are also available to consult on COVID related matters.

| Vic | NSW | QLD | TAS |
|-----|-----|-----|-----|
| SA | WA | ACT | NT |

### Establishing a site COVIDsafe management team

Having a COVIDsafe management team (or COVID safety supervisor), responsible for developing and reviewing the site's COVIDsafe plan is good practice – and is mandated by law in some jurisdictions and workplaces. Responsibilities should include:
- Ongoing monitoring for changes to health orders and COVID restrictions
- Developing and updating the site's COVIDsafe plan
- Delegating functions for the implementation of the COVIDsafe plan
- Organising training and simulation exercises to prepare the business for an exposure incident.

### Time to review your COVIDsafe plan

It is important that your COVIDsafe plan adequately addresses the changing COVID risk profile. Issues to consider in dairy manufacturing based on the six principles for a COVIDsafe workplaces are:

| 1. Practice physical distancing | Have you:<br>• Considered limiting access to the site, especially to non-essential staff, visitors, suppliers and the like<br>• Considered placing restrictions on staff (including casuals and labour hire) working second jobs or across different work sites<br>• Considered temperature checks and testing people using an approved rapid antigen test (RAT) prior to entry to the site<br>• Implemented appropriate QR codes/signage/floor markings to segregate areas, work teams and shifts<br>• Calculated density limits for spaces, staggered use of common areas, placed signage to inform staff<br>• Restricted movement of people between teams and work spaces<br>• Maintained separation of teams in shared spaces (parking, entry/exit points, change rooms, tea rooms, toilets, etc.) |
|---|---|
| 2. Face masks | Face masks are very effective in limiting the spread of COVID and their use is mandated in indoor work spaces in some jurisdictions. Have you:<br>• Conducted staff training on proper fitting/wearing of masks<br>• An adequate stock of suitable masks<br>• Considered the safe disposal of used masks<br>• Adjusted the management of other PPE to be COVID safe |
| 3. Hygiene | Guidance on hand and personal hygiene and the cleaning and disinfection of shared spaces is available from Safe Work Australia. Have you:<br>• Adequate supplies of approved hand sanitisers and effective disinfectants<br>• Established SOPs for cleaning an disinfection (VIC guidance)<br>• Documented rosters and cleaning log sheets of toilets, shared spaces, workspaces between shifts etc. |

| | • Minimised objects that could be reused/shared between work groups |
|---|---|
| 4. Record keeping | Records are essential to determine the extent of exposure should a COVID case or close contact be found on site. Have you:<br>• Records to show only vaccinated staff and contractors (or those without symptoms or risk of exposure to COVID) have entered the site<br>• Records of the attendance, work group and on-site movements of every person for the previous 14 days<br>• Contact details and vaccination status of all staff. Details of their living circumstances, school aged children, other jobs and work associates may also be very useful in the event of a COVID introduction<br>• Records of communications to staff on your expectations regarding minimizing their risk out-of-work hours, notifying the business should they have symptoms or be a close contact of a positive case, the support available if they need to get tested and isolate.<br>• Records of staff training & preparation |
| 5. Enclosed spaces and ventilation | Have you:<br>• Adjusted density limits based on ventilation<br>• Maximised airflow/ventilation in shared environments<br>• Optimised airflow in manufacturing areas (subject to food safety risks) to minimise air movement between work groups |
| 6. Workforce 'bubbles' and/or 'hubs' | Have you:<br>• Adjusted your rostering to minimise staff on-site (to create a pool of 'clean' staff to draw on if required)<br>• Staggered rosters to minimise interactions between work groups at shift changes, meal breaks etc.<br>• Created small discrete work groups (bubbles) to minimise the number of staff potentially exposed to a COVID case or a close contact<br>• Considered off-site interactions (living arrangements & social interactions) of staff when establishing work groups<br>• Considered the vaccination status of staff when establishing work groups<br>• Considered people flow through the worksite to minimise shared spaces & overlap (i.e., separate entrances/exits, toilets, break out areas)<br>• Appointed a person responsible in each bubble to monitor compliance with the COVIDsafe plan |

Safe Work Australia has developed some interesting case studies on how food manufacturing businesses have addressed workplace COVID risks. Links to State and Territory COVIDsafe plan templates can be found at *COVIDsafe plan*.

## Implementing your COVIDsafe plan

### Site security

Restricting access to the site becomes increasingly important as community restrictions are lifted and COVID infections become more common. Consider modifying processes where factory staff interact with others in the workplace such as when receiving deliveries and at dispatch. Third party logistics suppliers

have posed particular issues so move to contactless visits and electronic documentation where possible. Provide clear expectations and instructions for any company or person that wishes to enter the workplace, particularly with respect to their vaccination status.

Check identification, proof of vaccination and consider checking temperatures and/or RAT testing people for COVID on entry, especially contractors and others not part of the permanent work force. Requiring declarations from staff and contractors about having complied with COVID 19 requirements can underline the importance of site security and provide a useful tool in the event of a COVID incursion.

### Sourcing staff

Dairy manufacturing staff are generally considered 'essential' or 'authorised' workers (*Relevant definitions*) so are subject to additional requirements (i.e. vaccination and testing) and special conditions (i.e. close contact isolation exemptions) in some jurisdictions. Check *State and Territory Government Public Health requirements (for businesses)* and *Legal advice may be required for interpretation* for specific requirements relevant to your site. The dairy industry is actively advocating for a nationally consistent approach and additional concessions to shore up the dairy supply chain workforce, so expect further changes to State and Territory government requirements over the next few weeks.

People working in multiple workplaces are of particular concern. Set clear expectations for contractors, labour hire firms and consider the risks casual staff pose to the business. Ensuring all workers are fully vaccinated is good risk management and is mandated in some jurisdictions. Structure rosters to minimise the mixing of permanent and non-permanent staff and keep work groups small to limit the impact of any COVID exposure.

### Record keeping – QR codes & staff tracking

Records of staff entry, exit and movements around the site are invaluable for identifying close contacts (which may require testing and isolation) in the event of a COVID incursion. The use of QR codes and check-in apps is mandated in some jurisdictions. Different QR codes can be used for different work areas and work groups on-site. Maintaining social distancing and segregating the work force into small, discrete bubbles (or 'hubs') minimizes the number of staff impacted. Management (and public health officials) will need to review these and other records to determine the likely exposure of each staff member, before determining whether they should isolate and get tested. Further details about the process to assess the risk to staff and so the ability of the site to operate are given in the *'PART 2 - Responding to and re-opening from a COVID'* section (*Public health approach*).

### Communications with staff

Developing, implementing and reviewing the site's COVIDsafe plan needs the input of staff working within the various workgroups. Start the conversations early. Signage and procedures need to be available and appropriate to the workforce, with multilingual examples and templates available from most State and Territory public health websites.

Information sessions and WHS 'tool box' meetings should be used to discuss COVIDsafe procedures and issues. Additional sessions may be required to address issues such as staff vaccinations and testing.

Staff should also be made aware of the risks of car-pooling and mixing with people out-of-hours from high-risk industries or from different work groups within the business. Work groups can sometimes be structured to accommodate people that live or socialize together.

## Staff vaccinations

Vaccinated staff and contractors pose less risk of introducing COVID 19 on-site and spreading the virus if they are infected. Vaccination for people working in or entering higher risk environments (including dairy manufacturing sites and distribution warehouses) is mandated in several (but not all) State and Territory jurisdictions. Many companies have now introduced vaccination as a condition of employment and/or to enter their workplaces. Legal discussion is presented in the section *Legal advice may be required for interpretation*.

Dairy manufacturers should strongly encourage their staff and any people that come on-site to be fully vaccinated, if not already mandated by law. Booster vaccinations (3rd dose) are now required for dairy manufacturing workers in VIC. Consider structuring work groups according to their vaccination status as vaccinated staff pose a lower risk of transmission.

In VIC workers (employee, contractor or volunteer) must provide manufacturing businesses with evidence of their vaccination status under the State's mandatory vaccination requirements. The criteria and evidence for medical exemption from being vaccinated has also been tightened significantly.

In other jurisdictions dairy manufacturing workers may be required to be vaccinated or be subject to additional restrictions if public health orders mandate it. Special requirements may also be present for associated workers such as in logistics, warehousing and distribution. Check local requirements for more details.

## Staff surveillance testing

Surveillance testing is a requirement in Victoria for some large, higher risk workplaces located in Melbourne, including "food supply related warehousing and distribution". However, the chilled stores & distribution usually associated with dairy manufacturing sites are not included.

Non-invasive, contactless, infra-red temperature checks are commonly applied in the community and can be used in association with appropriate declarations.

Rapid Antigen Tests (RAT) on nasal swab/saliva samples provide a COVID test in a matter of minutes (~15 minutes) are becoming available for in-home use (self-tests) and point-of-care (POC) use in some jurisdictions. The Therapeutic Goods Administration has published guidance (Sept 2021) for businesses considering the use of RATs in their workplace, as have the Australian government, NSW, QLD, TAS and VIC. Currently in most jurisdictions RATs in the workplace must be used under the guidance of a trained health professional, but some businesses are requiring employees to undertake a self-test at home and provide evidence of the result when they arrive at work.

PCR testing is offered by public health authorities through local testing centres. This type of testing is used for testing of symptomatic staff and close contacts (if a RAT is not available) as per requirements relevant in the jurisdiction. Based on the result, the person is determined by the public health authority to be 'confirmed positive' or 'confirmed negative' to COVID 19 infection.

Waste (sewage) water surveillance testing is also an option for manufacturing sites that can sample human waste streams. Commercial testing can be arranged through laboratories currently undertaking testing for State and Territory health authorities in the ColoSSoS project.

### Cleaning products & services

Guidance on routine cleaning and disinfecting as a part of the sites COVIDsafe plan is provided by Safe Work Australia, which includes frequencies and the types of chemical products that are suitable. Supplier directories for PPE and associated COVID consumables are provided in VIC and NSW supplier directories. Be aware that scammers posing as suppliers has become an issue. Detailed guidance on procedures for a deep clean (following COVID exposure) are provided in *PART 2 - Responding to and re-opening from a COVID*.

### Practicing for an incident (simulations)

It is almost inevitable that your dairy manufacturing site will be impacted by COVID, either from a positive case on-site or from a close contact of a positive case on-site. Undertaking an exercise to examine how well the processes currently being undertaken in the business (as per the site's COVIDsafe plan) is helpful in identifying deficiencies that could impact on the time it takes for the business to recover from an incident. Site security, staff vaccination status and working arrangements, and record keeping to identify close contacts require particular attention. Reviewing experiences of others is also informative, with relevant case studies published by NSW. See *PART 2 - Responding to and re-opening from a COVID* for the information required and steps undertaken by public health officials to assess and clear a site for the resumption of operations.

## Other resources

- Dairy Australia – dairy Industry COVID 19 Directory
- Dairy Australia – farm COVID guidelines
- Dairy Australia - tanker operator COVID guidelines
- Australian Food and Grocery Council (AFGC) guidance
- National Farmers Federation

## PART 2 - Responding to and re-opening from a COVID incident

## Dairy manufacturing summary checklist – responding to and re-opening from a COVID incident

*Note that currently there is significant variation in the actions the public health authorities in different jurisdictions require dairy manufacturers to undertake after exposure to a positive case of COVID. The checklist below is based on significant public health involvement being required/available. So please seek guidance from your relevant public health authority website before taking action.*

| 1. | Isolate the infected person / close contact | Y/N |
|---|---|---|
| 2. | Notify the public health authority (if required) | Y/N |
| 3. | Assess the risks posed by conducting a site risk assessment | Y/N |
| 4. | Submit the risk assessment and close contact list to the public health authority (if required) | Y/N |
| 5. | Notify workers, suppliers or others that may have been exposed and inform them of relevant testing and isolation requirements | Y/N |
| 6. | Notify relevant WorkSafe authority (if required) | Y/N |
| 7. | Notify relevant State/Territory food safety authority and export regulator (if relevant) | Y/N |
| 8. | Consider vacating the areas visited by the COVID case (as per risk assessment) | Y/N |
| 9. | Deep clean the site / areas (if relevant) | Y/N |
| 10. | Re-open / re-commence operations (need approval in some jurisdictions) | Y/N |
| 11. | Review and update your site's COVIDsafe plan | Y/N |

## Aim

To protect staff, minimise disruption to the business and maintain or recommence operations as soon as possible following a COVID exposure on-site.

## Initiation

Dairy manufacturing sites become COVID exposure sites when designated as such by the State and Territory health authority. However, it is in the interests of dairy manufacturers to consider their site a COVID exposure site as soon as they become aware that the criteria used by the public health authorities has been met (in the event that notification by the health authority is delayed or no longer being provided). In this way, COVID response strategies can be initiated immediately, reducing the impact on the staff and business.

### Relevant definitions

Definitions are agreed nationally but State and Territory health authorities are responsible for implementing the definitions and classifying sites and/or people. As such, significant variation exists between State and Territory jurisdictions at this point in time.

Guidance on the criteria used to classify people and sites exposed to COVID in the workplace is being frequently updated in response to the higher COVID transmission and case rates associated with the new Omicron variant  (see *Steps to take in response to a COVID exposure*).

- Confirmed case – a person with definitive evidence of infection (i.e. +ve PCR or RAT test result).

- Exposure site – as designated by public health authority (by location and time). As case-loads increase public health authorities are only focusing on public sites where significant transmission has occurred (generally will not designate workplaces as exposure sites). Worksites should be considered to be exposure sites if a 'confirmed case' has worked in or visited the worksite within their 'infectious period'.
- Close contact – This definition has changed as case loads have increased. In Jan 2022 a [national protocol](#) was developed but has not been adopted by all jurisdictions yet. The new protocol regards close contacts as those in the same household as a positive case (>4 hours of exposure) or in a household -like setting (>4 hours of exposure indoors where masks were not worn) or people associated with significant transmission event (which may include exposure in a worksite). Close contacts are split into those with symptoms (requiring isolation and testing) and those without (requiring monitoring and RAT testing).
- Casual contact – person who has been in the same setting with a confirmed case in their infectious period, but does not meet the definition of a close contact.
- Incubation period – typically 2-7 days, but can be between 1 and 10 days.
- Infectious period – generally considered to be 48 hours before the onset of symptoms or from a positive test result, lasting for 14 days. However the COVID virus may still be present in respiratory secretions for more than 3 weeks after infection.
- Isolation period – [AHPPC guidance](#) - in high case-load environments the isolation period is 7 days (regardless of vaccination status) after the last exposure to a case, including a RAT test on day 6, followed by monitoring for symptoms for a further 7 days.

### How sites become COVID exposure sites

Exposure sites are determined by public health authorities during contact tracing activities, or when a member of staff notifies the business of their positive PCR test result. Most commonly dairy manufacturing sites become COVID exposure sites by:
- having a confirmed COVID case that was on-site during their infectious period; or
- having a close contact on-site 24 hours after they were exposed to a confirmed COVID and within 14 days of their exposure to the confirmed positive case; or
- if advised by the public health authority (for another reason).

In jurisdictions where COVID has become established, close contacts are allowed to work on-site during their isolation period subject to certain controls (see *State and Territory Government Public Health requirements (for businesses)*) under special 'isolation exemption' orders for essential workers (Jan 2022).

Public health authorities are requiring individual businesses to take the lead following a COVID exposure, with minimal involvement from the local public health unit. As such, dairy manufacturers should activate their response plan if they become aware of the above circumstances, involving public health authorities .

## Statutory requirements in response to COVID

### State and Territory Government Public Health requirements (for businesses)

Requirements for dairy manufacturing businesses responding to a COVID exposure differ between jurisdictions and are subject to frequent change. Examples include: notification requirements, provision

of records, conduct of site risk assessment and contact tracing procedures, and authority to operate/recommence operations following a workplace exposure.

Workers involved in food manufacturing and distribution are categorized as 'essential workers' and so are subject to special arrangements including the 'isolation exemption' (Jan 2022) in some jurisdictions

Monitor the current public health requirements relevant to your site using the links below:

| VIC & VIC | NSW & NSW | QLD | TAS |
|-----------|-----------|-----|-----|
| SA & SA | WA – N/A | ACT | NT & NT |

### Consider WHS requirements

National COVID WHS resources for workplaces are available here. Most State and Territory Worksafe authorities require workplaces to notify them in the event of a COVID incident meeting certain criteria.

| VIC | NSW | QLD | TAS |
|-----|-----|-----|-----|
| SA | WA | ACT | NT |

### Consider food safety requirements

State and Territory food safety regulators (SRAs) are available to work with dairy manufacturers impacted by COVID to ensure food safety is maintained. SRAs expect to be notified where there is a COVID exposure incident that impacts on processing or production at the manufacturing site. Guidance from FSANZ for food manufacturing businesses is also available.

| VIC | NSW | QLD | TAS |
|-----|-----|-----|-----|
| SA | WA | ACT – N/A | NT – N/A |

### Consider export requirements

Dairy manufacturing sites and stores that are registered for export with the Department of Agriculture, Water and the Environment will need to notify the Department of any COVID positive case identified as working within the site. The department will work closely with the SRAs to identify any approved arrangement operations, procedures or systems that are significantly impacted by COVID. Consideration of changing importing country requirements should be taken into account when responding to any COVID related incident.

## Considerations to minimize the impact on staff and operations

### Public health approach

All States and Territories have published guidance on what businesses within their jurisdiction should do in the event of a COVID exposure at a workplace and the approach varies with the jurisdiction. Generally public health authorities get very involved in areas where COVID has not yet established and are less involved where COVID has become established in a largely vaccinated population.

However, whether led and managed by the public health authority or the business itself, the approach follows essentially the same pathway (see *Steps to take in response to a COVID exposure*).

### Information required to assess the public health risk

Following COVID exposure a site risk assessment will be conducted based on records. This is why having effective and complete record keeping systems in place before the exposure, is integral to protecting your staff and minimizing disruption to the business. In particular, records that identify when the COVID case was on-site and for how long, where they went and who they came into contact with, are all vital to conducting the initial site risk assessment and identifying primary and secondary close contacts.

In some jurisdictions these records need to be handed over to public health authorities, whilst others allow the business to conduct the site risk assessment, contact tracing and retain their records for later verification if requested.

### Potential outcomes from a risk assessment

In jurisdictions that require public health involvement, the public health authority will determine whether manufacturing operations can continue based on the site risk assessment, and if already halted, when they can recommence. Businesses can greatly facilitate this process by collating the information required and forwarding it to public health in a timely manner.

In jurisdictions that do not require public health involvement, dairy manufacturers have the responsibility to assess the risk, implement measures to protect staff and the public. Manufacturing can continue if the public health and WHS risks have been addressed and it is safe to do so.

## Steps to take in response to a COVID exposure

NSW and VIC have recently simplified/modified their procedures to streamline the way businesses respond to COVID exposure. In other States and Territories the public health authorities take a more active role. Safefood QLD has just released guidance specifically for food manufacturing businesses.

However all loosely follow the approach advocated by WorkSafe Australia (April 2020).

Importantly, if you are aware of a COVID exposure on-site, check the requirements in your jurisdiction (see *State and Territory Government Public Health requirements (for businesses)*) and start taking steps immediately. Do not wait for notification from the health department before taking action – they may be delayed.

**Immediately**

| Steps | Public health authority actions* | Dairy manufacturer actions |
|---|---|---|
| 1. Isolate the infected person / close contact | Order the person to self-isolate (and get tested if they are not already a confirmed COVID case) | Isolate the person if on-site immediately. Ensure they have appropriate PPE. Test them using a RAT and/or send them off-site to get PCR tested (if not confirmed already) and then home to isolate until the result is known. |
| 2. Notify the public health authority when there has been a confirmed case of COVID in the workplace* | | Most public health authorities have a notification form that must be completed and submitted. Notification is only required in VIC and NSW if the number cases linked to the site exceeds certain thresholds. |

| * Some State public health authorities do not require notification from the business so may not be actively involved in the business's response to a positive COVID case. |
|---|

**As soon as possible (within 24 hours)**

| Steps | Public health authority actions* | Dairy manufacturer actions |
|---|---|---|
| 3. Identify the workplace contacts of the infected worker | Provide guidance on which people are to be considered close contacts. The public health authority may conduct this step in some jurisdictions. | Compile a list of who meets the criteria of being a close contact of the COVID case. Tools are provided by some jurisdictions to help in this task but these have not been updated with the latest definitions or special requirements for food manufacturing workers/businesses. An example assessment matrix has been published in VIC. QLD also provides guidance. |
| 4. Submit the risk assessment and close contact list to the public health authority* | In association with the business, conduct a risk assessment based on the information provided. Involve food safety authorities if required. | Most jurisdictions now expect this step to be completed solely by the business (retaining records for later verification if requested). |
| 5. Notify your workers, suppliers and any other workplace contacts and inform them of any testing and isolation requirements | Provide guidance on testing and isolation requirements for (primary and secondary) close contacts. | Consider the most appropriate mechanism to notify. The identity of the COVID case should not be revealed. Consider contractors or others who may have visited the site whilst the COVID case was present (check rosters, entry logs etc). Note that testing and isolation requirements for contacts vary between jurisdictions. |
| 6. Notify WorkSafe | | WorkSafe must be notified in most jurisdictions. Notification requirements and processes are on their websites (see *Consider WHS requirements*) |
| 7. Notify relevant food safety authorities | | Notify relevant SRA if the COVID exposure impacts on manufacturing processes or production. Notify export regulators if relevant. |
| 8. Consider vacating the areas visited by the COVID case or closing the workplace | Provide advice to the manufacturer on what is required to resolve the incident.* | These decisions may be based on the manufacturer's own risk assessment if no advice is available from the public health authority. |
| 9. Deep clean | Provide advice on deep cleaning requirements. General advice on how to undertake a deep clean is available here. | Most jurisdictions have now removed the mandatory requirement to deep clean the areas exposed to the confirmed case. However cleaning and disinfection of common touch points maybe appropriate to mitigate WHS risks in accordance with the site risk assessment. |

| 10. Re-commence operations | Notify the business when it is safe to recommence operations (based on risk of on-going transmission and completion of deep cleaning requirements).* | In most jurisdictions manufacturing operations can continue if the risks to public health & WHS are being effectively managed. Check the requirements in your jurisdiction. Keep a record of your actions as public health may become involved if the controls are found to be inadequate and workplace transmission becomes an issue. |
|---|---|---|
| 11. Review your COVIDsafe plan | | Incorporate any changes to the COVIDsafe plan that will improve practices. |
| * Some State public health authorities may not be actively involved in the business's response to a positive COVID case. | | |

## Other resources

- Safe Work Australia – information for workplaces
- Australian Food and Grocery Council (AFGC) guidance