COVID-19 Worker Health and Safety Best Practice Guidance

The can manufacturing industry is committed to providing metal food, beverage, aerosol and general packaging that delivers safe, healthy and affordable products to consumers while maintaining a safe workplace for its employees.

Coronavirus Disease 2019 (COVID-19) is an infectious disease caused by the severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2). The virus that causes COVID-19 is thought to spread mainly from person to person, through respiratory droplets produced when an infected person coughs or sneezes. The World Health Organization declared COVID-19 a Public Health Emergency of International Concern on January 30, 2020, and the United States Secretary of Health and Human Services declared that COVID-19 presents a public health emergency on January 27, 2020. In response, the Centers for Disease Control and Prevention (CDC) and the Occupational Health and Safety Administration (OSHA) have issued several guidance documents, including:

- CDC's "Interim Guidance for Critical Workers Safety Practices COVID-19"
- CDC's (in conjunction with OSHA) "Interim Guidance for Manufacturing Workers and Employers"
- CDC's "Interim Guidance for Businesses and Employers" to plan, prepare and respond to COVID-19.
- OSHA's (in conjunction with the Department of Health and Human Resources) "Guidance on Preparing Workplaces for COVID-19."

The U.S. Department of Homeland Security (DHS) recognized that it is "imperative during the response to the COVID-19 emergency" to have a functioning critical infrastructure for "both public health and safety as well as community well-being." DHS has identified "food manufacturer workers and their supplier workers" as part of the essential critical infrastructure workforce, including those employed in the production of food packaging. During the COVID-19 public health emergency, the U.S. Secretary of Agriculture has cited "packaging" as "vital to our needs of America having a strong food supply."

In response to COVID-19, several states have issued orders and/or guidance related to mitigation, social distancing and cleaning protocols for businesses operating in their respective jurisdictions. As applicable, CMI members will comply with state orders and guidance as well as recommendations and requirements from CDC and OSHA.

The guidance outlined in this document is meant to provide operating and safety considerations when implementing four important components of the relevant CDC, OSHA and state guidance or orders.

1. Social Distancing
2. Hand Washing and Sanitizing
3. Face Coverings
4. Cleaning/Disinfecting

Social Distancing

Maintaining social distancing is a key best practice. For work assignments where adequate social distancing cannot be maintained, either on a regular or episodic basis, alternative/supplemental measures should be evaluated to determine their effectiveness and consistency with other workplace safety practices. Alternative/supplemental measures could include:

- face masks/cloth coverings
- structural safety shields (placed on or near equipment in defined work spaces)
- personal wearable face shields compatible with eye protection safety
- Use of radios or headsets
- Communicating via email, Skype, Teams, Zoom, etc.
- Posting of crew notes rather than holding crew meetings

Hand Washing and Sanitizing

Frequent and thorough hand washing is a key best practice. Workers should be provided with access to soap, clean running water and single use paper towels for handwashing. Additionally:

- In areas where access to soap and water are not immediately available, or easy to access due to location of a work assignment, alcohol-based hand sanitizers containing at least 60% alcohol should be provided.
- Consistent with workspace configuration and locations of worker assignments, hand sanitizer stations can be installed in appropriate locations to encourage hand hygiene. If possible, choose hand sanitizer stations that are touch-free. Locate hand sanitizer stations in areas that do not cause workplace safety hazards, including interfering with safe operation of nearby equipment, or obstructing aisles or walkways.
- Encourage worker hand hygiene practices through posting appropriate signage or providing other reminders about the importance of proper hand washing and sanitizing.
- Consider other workplace programs to promote personal hygiene, such as adjusting/managing staff schedules and breaks, to increase how often staff can wash their hands with soap and water or use hand sanitizers with at least 60% alcohol.

Face Coverings

Companies should implement appropriate face mask policies as a supplemental to social distancing, however, there are conditions when the use of face masks/cloth coverings can interfere with safe work practices. Adjustments to face mask policies should be considered when their use

- conflicts with or interferes with the effectiveness of eye protection safety equipment.
- interferes with the ability of workers to use non-verbal communicate techniques to safely conduct work activities in areas with elevated noise levels, particularly when hearing protection is being worn.
- could create health and safety concerns due to worker stress/discomfort in high temperature conditions.
- requires accommodation for workers who have medical/health concerns related to wearing a mask/face covering

Cleaning/Disinfecting

Consistent with OSHA and CDC guidance, can manufacturing facilities should maintain plans for both the regular disinfecting of surfaces, equipment and other elements of the work environment, as well as reactionary sanitizing (done following a confirmed case in the workplace). Appropriate cleaning and disinfecting practices and procedures can vary for different locations within a manufacturing facility. Practices and procedures for office spaces, break rooms, common areas and restrooms can be expected to differ from those used in manufacturing areas.

The types and frequency of cleaning and disinfecting hard surfaces should take into consideration:

- Need for increased cleaning and disinfecting of commonly touched surfaces.
- Need to remove surface dirt/grease before applying disinfectant products.
- Compatibility of the products being used with the surfaces being cleaned (e.g., certain products may cause harm to metal surfaces) and for the device being used (e.g., not all viricides are combatable with a "fogging" device).
- Need for personnel to be vacated from the area (some stronger viricides require no exposure to the sanitized area for several hours).
- Effectiveness of the disinfectant products being used.
    - The Environmental Protection Agency (EPA) maintains a list (List N) of surfaced disinfecting products that considered effective for use against the SARS-CoV-2.
    - CDC guidance cites bleach solutions (4 teaspoons of bleach per quart of water) and alcohol solutions (at least 70%) as effective for disinfecting surfaces.
    - Hydrogen peroxide is one of the listed active ingredients for a number of products on EPA's List N and hydrogen peroxide previously has been cited by CDC in its 2008 Guidelines for Disinfectants and Sterilization in Healthcare facilities.
- Following the manufacturer's instructions for product use (e.g., concentration, application method and contact time, PPE).
- Conducting disinfecting at times and in ways that limit any potential harmful exposure to workers.