

FOOD SAFETY

**Managing
Food Safety
during Covid-19**

BRCGS GUIDANCE DOCUMENT
Managing Food Safety
during Covid-19

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Introduction and how to use these guidelines

The restrictions which many countries have brought into place to manage the spread of Covid-19 have in turn severely impacted the food industry. Consumer buying patterns have changed resulting in panic buying testing the ability of some food chains to respond, whilst on the other hand closures of food service outlets and non-food retail has resulted in loss of markets for others.

Much of the focus in factories has rightly been on changing the way that we work introducing social distancing and new working practices to safeguard the health of our workers.

Expert advice including that of WHO is that Covid-19 is not transmitted by food.

The changes which we have all had to make do however introduce new challenges to the way that we manage food safety as we come to terms with potential disruption to supply chains, staff absenteeism and an influx of new temporary workers to the food industry.

This guidance document has been produced to complement the BRCGS Food Safety Standard. It is intended to help managers fine tune their food safety management systems to cope with the new position which the food industry now faces.

The document has been laid out to follow the flow of subject areas within the BRCGS Food Safety Standard for consistency. It is published alongside a developing set of complimentary subject guides, useful links and webinars which are all available in the Covid-19 resource centre on the BRCGS website <https://www.brcgs.com/resources/covid-19-response/>

Guidelines

1. Senior Management

The management of the Covid-19 situation, decision making, communication, implementation and the review of effectiveness of new measures all need to be carefully co-ordinated.

This is best achieved by having a defined management team with responsibility for the management of the Covid-19 response reporting to the overall site manager. Within the team there needs to be a clear team leader and deputies and clear assigned responsibilities for the various activities, to manage the response to Covid-19. Often responsibilities will naturally fall into existing management remits such as Human Resources, Technical, Production however there will be many cross functional activities and it is important to define who has responsibility for specific tasks.

One of the likely consequences of the Covid-19 situation will be higher levels of absenteeism due to sickness or self-isolation; this will occur in the Management team as much as any other group of employees. It is particularly important therefore to ensure information is shared, that there are clear deputies assigned across the whole management and supervisory team. All need to be kept up to date with actions and wherever practical, actions and new policies should be documented. This will enable workflows to be more quickly and easily picked up by others.

Where sites are adversely affected by demand for products, decisions may be needed to reduce the work force. It is important, when making such decisions, that the choice of who to release does not affect the ability to continue to produce safe products. Due regard needs to be given to the importance of non-production staff in hygiene, technical and engineering roles and how any reduction may affect shift cover and food safety.

1.2 Covid-19 Management Meetings

Co-ordination of activities, review of changing circumstances and progress requires regular management meetings, probably daily to begin with. The meetings may need to have a facility for some of the team to attend remotely. As the situation stabilises it may be possible to reduce the frequency of the meetings, but it is probably better to have shorter meetings each day, rather than less frequent meetings.

As a guide the meetings will need to include some or all, of the following items:

- update on the progress from the previous day's actions
- review of resource issues – raw materials, staff, cleaning supplies etc.
- any feedback from employees on measures taken
- review of any incidents from previous day and learning
- review of absenteeism levels due to staff sickness, isolations for Covid-19
- any changes to Government or industry advice
- any new customer requirements or requests.

It is valuable to keep notes of the meeting to allow follow up and a record of the key decisions made for future reference.

1.3 Access to Information The site should ensure that there is a designated person with responsibility for reviewing changes to Government advice and any applicable industry advice. Access to discussion groups and forums can also be a valuable means for understanding best practice and new ideas.

1.4 Effective Communication and updates for employees is particularly important during this period. It can be a period of rapid change as sites respond to an ever-changing external environment in terms of both government policy and customer order patterns. Employee briefings at least weekly either in person as a semi scripted team briefing or via a newsletter are recommended.

A newsletter format is particularly effective for groups of sites and can provide a platform for shared best practices across the group.

2.1 Food Safety Plan HACCP

2.1.1 Review of changes to the pre-requisite plans

The existing HACCP plan will have identified the prerequisite programs and critical control points under normal operating conditions. The pre-requisite programs are likely to be affected by changes made to the operation in response to Covid-19. It is important to review any planned changes to understand and mitigate any impact on product safety.

The HACCP Manager or Team must have a role in the decision to make changes to pre-requisites to ensure these do not compromise food safety e.g. changes to cleaning chemicals, cleaning schedules, pest control visits, frequencies of line inspection, testing etc.

It is likely that in many sites the normal operating level of production lines will change with adjustments made to line speeds to accommodate reduced staffing levels, enable social distancing and staggered employee breaks. It is important therefore that where changes occur there are established minimum safe operating levels agreed. This may particularly affect cleaning and maintenance programmes where access is required to production lines.

2.1.2 HACCP review

Where ever changes to the production process are made for example where new products are introduced or there is a change of raw material for example the use of a frozen raw material in place of a chilled material or the freezing down of products; then this needs to be reviewed by the HACCP manager to ensure all of the risks associated with such a change are properly understood and managed.

2.1.2 Management of Critical Control Points

The Critical Control points identified through the HACCP programme are critical because they enable control of the safety of the products and cannot be compromised. At this time, when the operation is under stress, increased emphasis of the identified critical control points should be given. This should include:

- identification and training of deputies to manage CCPs to cover for any absenteeism
- clear identification of critical control points within the processing environment for the benefit of new employees
- reference to the significance of the relevant CCPs in the training of new or temporary staff recruited
- additional checks sign off of CCP records particularly where monitoring is carried out by less experienced staff.

3. Food Safety and Quality Management System

3.1 Internal Audits

The internal audit programme should be reviewed to ensure the focus is on processes most at risk, as a result of changes introduced in response to the Covid-19 pandemic.

There may need to be a greater emphasis on management of Critical Control Points and aspects of plant hygiene, personal hygiene.

If as is likely, this results in the postponement and rescheduling of some of the planned internal audit activities then this should be documented to help explain the decision at a later audit.

Where internal audits are normally provided, in part, through external consultants or group functions it may be possible for some of this work to continue as a remote activity through the use of online interviews and document sharing. Where the audit is carried out remotely this needs to be recorded as such.

3.2 Emergency Supplier and Raw Material Approval

It is quite likely that there will be shortages of raw materials as production shuts down or reduces in parts of the world and the supply chains become disrupted as a result of sickness and absenteeism and potentially border

closures. If this happens alternative sources of supply for raw materials will need to be used to ensure continuity of production. This brings increased risks and it is very important that these risks are understood and managed.

Whilst supply issues cannot always be predicted steps should be taken to monitor the supply chain. This could include, regular reviews with suppliers of their stock situation, understanding the situation in countries of origin for key raw materials and watching commodity prices as an indication of product scarcity.

3.2.1 Emergency Supplier approval

It may be necessary to use emergency suppliers of raw materials, processing aids or packaging materials. Inevitably it will not be possible to visit or audit the site however the following options should be considered in order to gain confidence in a potential new supplier:

- check for existing certifications or audit reports to review
- consider remote site audits
- carry out online searches for historical site issues or information
- request product samples and specifications for assessment.

Where new raw materials are sourced via Agents or Brokers the manufacturer of the new raw material must be known. This enables checks on the raw material manufacturer to be carried out. If the Agent or Broker is, itself, certificated and has assessed the supplier then further investigation should not be required.

The Technical Manager should always be part of the decision-making team and consent to the acceptance of a new supplier. The information obtained as the basis of the approval needs to be documented for future reference.

New suppliers approved through the emergency procedures need to be identified as such in the quality system to allow for a more formal review when the situation returns towards normal.

3.2.2 Raw material approval

When introducing new raw materials or processing aids whether from a new supplier or existing supplier it is essential to have information about the material before acceptance. This allows for a full review of the consequences of its use. This should include:

- product specification including all component ingredients as applicable
- identification of any significant variance from the current raw material it will be used to replace
- the nature of the raw material i.e. frozen, chilled etc
- full list of allergens declared or considered likely to have cross contaminated during production. Most importantly check for any new allergens not present in the original raw material
- any potential effect on product shelf life
- the potential for fraud or substitution.

For each new raw material to be used a full list of finished products which the raw material will be used to manufacture should be compiled and reviewed with particular emphasis on any packaging claims being made which may be affected by the change of raw material.

Where any changes have been identified for example the inclusion of a new allergen or component requiring a change to ingredient declaration then this must be addressed before using or accepting the new raw material.

3.2.3 Packaging Materials

Where it is necessary to change supplier of packaging materials it is important to understand any differences in specification between the new and former product. The packaging specification needs to be reviewed with consideration of any effect on:

- migration of chemicals into food (where direct food contact)
- product shelf life – for instance where barrier layer properties have changed
- product protection during transit.

3.2.4 Raw material inspection and testing

Where new raw materials or suppliers are being used then the raw material inspection and testing procedures should be reviewed before first delivery and additional checks introduced as necessary. This should continue until confidence is established in the new raw material. When setting the acceptance testing process consideration should be given to:

- the need for positive release of initial deliveries
- enhanced testing and inspection protocols for the new raw material receipt
- any specific additional laboratory testing required for the ingredient
- the need for certificates of analysis to be supplied with the raw material.

3.3 Customer Focus and Communication

Sites that co-pack for brands or supply customer branded products need to ensure that wherever changes to raw material or supplier or significant changes to production methods or controls occur this is communicated to the brand owner.

This must be in advance of the changes being made and approval for the change provided by the brand owner. Wherever changes are required to customer brand labels these must be agreed in advance with brand owners. The changes and confirmation of agreements to change, need to be documented and may require updates to finished product specifications.

4. Site Standards

4.1 Site security and Food defence

4.1.1 Temporary workers

It is likely that during the period of Covid-19 crisis it will be necessary for sites to take on more temporary workers to cover for increased rates of absenteeism or the need to cover additional shifts due to demand or slower line speeds.

This may make the site potentially at greater risk from individuals or groups wanting to disrupt the supply chain or for breaches of site policies for instance secret filming on mobile phones to occur, where this may not be permitted.

As always there is a delicate balance to be observed between protecting the site and the rights of the individual however it is important that the existing approved measures are maintained during this period.

Where there are large numbers of new staff the use of increased signage to help new employees understand the rules and expectations should be considered.

4.1.2 Site visitors

Access to the site will need to be reviewed and may be restricted during the period of Covid-19. It is important that the site has a clear policy for acceptance of visitors to the site which needs to cover:

- general visitors
- Sub-contractors/service providers including pest control, service engineers, contract cleaners, laundry services, laboratory couriers etc.
- vehicle drivers
- emergency services.

It is useful for the site security where present to have a list of visitors and subcontract service providers which are permitted access to the site.

Where service providers and transport drivers are allowed access, the site rules and requirements must be available when coming on site. This should include any health declarations which may have been introduced. New site rules for visitors should be provided in advance to the management of service providers.

4.2 Layout and Product Flow

As part of the review of social distancing it may be necessary to change the way in which employees move around the factory. This may include the introduction of new entrance points to prevent queuing at shift changes. When making these decisions it will be important to consider any impact this may have on physical (allergen) or microbiological cross contamination.

Particular care will be needed where sites have high care or high-risk facilities to ensure the strict control of movement of people and equipment/product in and out of the area is not compromised.

4.3 Equipment

Wherever possible equipment allocated to individuals for example knives should be identifiable to reduce the need for this to be handled by multiple people during a shift.

4.4 Maintenance

It is likely that because of adjustments to production planning to accommodate social distancing and changes in order levels, that access to the plant for routine maintenance will be disrupted.

4.4.1 Planned preventative maintenance programmes

Planned preventative maintenance programmes will need to be reviewed to set minimum maintenance levels acceptable to run the plant without unacceptable increased risk of breakdown.

Conversely there may be some lines which will be shut down providing the opportunity to bring forward more significant maintenance work.

4.4.2 Contamination risk from equipment failure

Items which are of known risk of failure, damage or rapid wear; which could lead to product contamination need to be identified and regularly inspected where planned maintenance programmes have been reduced e.g. sieves, rubber gaskets, plastic mixing paddles, conveyor belts etc.

4.4.3. Engineering sub-contractors

Where specialist engineering contractors are used these will need to be closely controlled and managed in accordance with the sites Covid-19 visitor policies.

4.5 Staff Facilities

4.5.1 Changing areas and locker rooms

Changing areas and locker rooms are not usually designed to allow effective social distancing at times of peak usage for example the start and end of shifts. Additional space for changing or storage may need to be made available for example by the use of vacant office space, portacabins etc. The plans for such changes need to be reviewed to ensure this does not compromise food safety. This is not likely to be acceptable for changing prior to entry to High care or High-risk areas.

In order to allow effective social distancing in high care and high-risk changing areas it is likely that more time will need to be allowed at shift changes to enable access for changing at any one time to be limited. This will need to be considered when production planning.

4.5.2 Storage of Personal Protective Equipment (P.P.E.)

It is possible that employees may need to be issued with additional PPE during the pandemic. If any of the PPE is expected to be reused for example visors, then consideration should be made for how this can be:

- effectively cleaned after each use
- individually marked to be identifiable to the wearer
- safely and hygienically stored between shifts where existing locker space may not be adequate.

4.5.3 Hand washing facilities

Hand washing has always been a high priority in food factories. The management of hand washing at periods of peak demand for example the start of a shift start needs to be carefully considered to ensure that effective hand washing is not compromised by the need to ensure social distancing.

Whilst the use of additional hand sanitisers may be prudent to provide employee protection this does not substitute for effective hand washing before starting work. Soap dispensers and any additional sanitiser stations need to be monitored to ensure these are regularly re-filled. Where ever possible soap dispensers should be automated to avoid direct contact.

4.6 Chemical and physical product contamination control

It is possible that production lines may need to be adapted to allow for adequate social distancing or that screens are added to workstations to separate and protect workers. Any such changes need to be considered in terms of potential for damage and foreign body contamination of products. Where perspex screens are added these should be added to the glass and hard plastic register and inspection process to identify damage.

4.7 Housekeeping and Hygiene

As with maintenance, the cleaning schedules will need to be reviewed to account for changes in production scheduling, possible fluctuations in levels of cleaning staff and changing priorities to protect staff. There will need to be the development of close working relationships with production planning and engineering to ensure the most efficient use of resources.

4.7.1 Cleaning schedules

The review of cleaning schedules and priorities should give particular consideration to:

- identification and inclusion of hard surfaces with the potential for transfer of Coronavirus between employees for example door handles, utensils, re-useable crates etc.
- inclusion of additional equipment such as screens added to lines to safeguard workers
- establishing minimum acceptable time for cleaning, and consequent periods of line downtime for cleaning and ensuring that these are understood by the production planning team
- the availability of easy to understand cleaning guides to help new staff clean effectively and where necessary increased supervision
- the cleaning of equipment either being taken out of production or previously infrequently used equipment coming back into production
- The need for specific cleaning procedures to be used where an employee is taken ill from Covid-19 during the working day.

In order to ensure that any adjustments made to the cleaning practices are effective it may well be necessary to increase levels of environmental monitoring and line change-over/start up inspections.

4.7.2 Cleaning Materials

It is possible that shortages of some cleaning materials may occur and that it becomes necessary to either change products being used or supplement supplies by obtaining products from a new supplier.

If this is the case it is important to ensure:

- the new material is appropriate and effective for the intended cleaning activity by reviewing specifications and discussions with the chemical supplier
- cleaning instructions are changed for example to accommodate any changes to dilution rates, usage and health and safety requirements
- that any changes to contact times or surface rinse to remove residues is fully understood and implemented
- new chemicals are compatible with the cleaning equipment used on site for example foam cleaners
- materials not usually acceptable on site for example strongly scented cleaning materials are not purchased even for non-production areas.

4.7.3 Cleaning subcontractors

Where part, or all, of the cleaning activities are carried out by subcontractors it will be necessary to ensure that the subcontractors are fully aware of the sites Covid-19 management policies and that these have been explained to their employees. It is likely that subcontractors will also be facing the same sort of challenges with disruption to supply of some cleaning materials and availability of staff. Close communication with the sub-contractor needs to be maintained to ensure the potential risks identified above are managed.

4.8 Pest Management

4.8.1 Pest contractors

In the majority of sites, the pest management is provided by an external pest control contractor. Where any changes to site access for pest controllers for routine visits or the in-depth survey (sometimes referred to as the field biologists visit) are being considered this should be risk based and consider:

- historical incidence of pest issues
- the type of raw materials and products produced and inherent risk of pest infestation, for example stored product insects
- the age, complexity and standard of pest proofing
- seasonal factors.

This should be discussed with the pest contractor in advance of making any decision to reduce or prevent site access.

4.8.2 Pest surveillance

Where pest controller activity is reduced as a safeguarding measure additional in-house surveillance and pest reporting procedures should be introduced to compensate. Where any pest activity is identified specialist pest management advice should be sought.

5. Product Control

5.1 Product Labelling/Re- Labelling

Shortages of raw material supply may result in the substitution of a raw material which could affect the label declaration for example:

- claims of provenance, organic etc
- country of origin declarations
- plant licence numbers e.g. EC numbers where product is outsourced
- allergen declarations
- ingredient list declarations
- ingredients of special emphasis
- cooking instructions for the final product
- nutrition declaration.

If changes need to be made to printed labels it is important that this is carefully managed through the label management procedures. Where necessary customers and government authorities will need to be informed, of and approve changes.

Label amendments present a greater risk where the change may be temporary and existing stocks of packaging may want to be kept for future use, when normal supply arrangements return. Consideration should be given to:

- approval of changes before printing and the review of first print samples
- controls at the printer for separation of new printed packaging from existing stock
- clear identification on outer boxes overwrap etc to differentiate new and previous print runs
- checks on receipt of packaging at the site to ensure correct labels have been shipped
- clear segregation of new and existing incorrect label stock during storage
- additional specific checks on-line to ensure the correct print run is being used.

5.1.2 Application of secondary labels

There may be occasions where a secondary label needs to be applied to existing printed packaging for example to adjust packs for ingredient changes or repurposing of product from food service to retail sale.

The changes being made need to meet with legal requirements in the place of sale and should be managed through the usual site label development and approval processes.

Clear instructions should be provided at the labelling area to show how additional labels should be applied and this should be accompanied with example packs for reference. Additional production line checks should be carried out to ensure the correct label is used and that this is correctly placed on packs.

5.1.3 Additional labels printed on site

If secondary labels are printed on site then this process will need to be very carefully managed to prevent errors, this should include:

- label check and sign off as correct for each batch produced
- batches of labels clearly identified by product and where possible label batch number
- records maintained of the numbers of labels produced
- printed labels allocated to lines and checked in accordance with the core standard labelling requirements.

Ideally labels should be produced in accordance with daily requirements and not produced in bulk.

5.2 Vulnerability assessment /fraud prevention

5.2.1 Unfortunately shortages of supply of materials are often accompanied by price rises and this can increase the risk of fraudsters entering the market with substituted products, extended products or false claims.

Often the buyers are most aware of market scarcity and changes of origin or price increases in raw materials. It is important to maintain a close working relationship between the buying and technical teams to share information on changing circumstances and access the potential risks from fraud.

It is recommended that sites:

- closely monitor raw material shortages and price changes to identify raw materials at greatest risk from fraud
- pay close attention to articles and published incidents of fraud
- review the raw material risk rating and contingency plans
- increase testing or inspection procedures where appropriate for raw materials identified to be at increased risk.

7. Personnel

During the Covid-19 crisis it is likely that absenteeism levels due to sickness or self-isolation will be higher and there may be the need to take on additional employees to compensate or to meet increases in demand.

7.1 Training – New and temporary employees

7.1.1 It is particularly important that training is provided for new and temporary employees taken on, either directly, or through agencies because many may be new to the food industry. This should include:

- induction – site processes, actions in case of an emergency, health & safety, etc.
- normal product safety procedures, for example, site allergen management
- special procedures for Covid-19 – these will obviously be site dependent, but might for example, include:
 - Personal hygiene
 - Arrival at/departure from site
 - Requirements for safeguarding employees such as social distancing, amendments to changing procedures or shared areas such as canteens
 - Sickness reporting procedures
- training related to their specific duties or role.

It will also be important to consider how this induction and training is completed. Normal 'classroom' or face to face meetings need to observe rules relating to social distancing to ensure employee's welfare. It may therefore be necessary to consider novel ways for completing this. For example, can any items be effectively completed remotely, for example, the day before the candidate first arrives onsite?

7.1.2 Training of existing employees

The training plans for existing staff are likely to need to be reviewed and where necessary rescheduled. There are likely to be elements of training that will need to be postponed such as classroom-based training or visits to other sites, however some aspects remain vital and their continued, effective operation will need to be considered. For example:

- update training in new procedures relating to Covid-19 will need to be effectively understood and implemented by all staff.

In the event of staff absences up to date training records and competency assessments could become an important resource to identify qualified deputies.

7.2 Sickness reporting

A key component of the changes made to the operation of the site are to safeguard workers and reduce the risk of spread of Covid-19. The existing processes for reporting sickness and guidance on medical screening will need to be reviewed and supplemented with new procedures put in place to safeguard fellow workers.

7.3 Protective clothing and laundry facilities

Where laundry facilities are used for the cleaning of protective clothing the laundry should be contacted to ensure that the cleaning processes used are adequate to remove and kill coronavirus.

7.4 Medical Screening

The existing medical screening procedures will need to be extended and communicated to ensure employees are aware of the site's requirements with regard to the management of Covid-19.

The procedures will need to include the acceptance of employees back to work following absence for Covid-19. Where this includes return to work interviews these will ideally be carried out in a segregated area to reduce the risk of spread of Covid-19 should it be decided that an employee may still be infectious.

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