Adapting food manufacturing operations during COVID-19

Guidance on how to work safely in the food manufacturing sector during the COVID-19 pandemic.

This guidance is to help employers, employees and the self-employed understand how to work safely in the food manufacturing sector during the COVID-19 pandemic.

Guidance from the Food Standards Agency focuses on the hygiene processes and requirements you must follow to continue to safely operate your food business.

This guidance should be read in conjunction with Working safely during COVID-19 and wider government advice on COVID-19. This will give you a practical framework to identify what you need to do to continue, adapt or restart operations during the COVID-19 pandemic.

Risk assessment and review

In line with wider government advice, you should make sure that the risk assessment for your business addresses the risks of COVID-19, using the government social distancing guidance to inform your decisions and control measures. You should consider how this impacts on existing food safety management systems.

Food manufacturers are required to implement and maintain hygiene procedures based on Hazard Analysis and Critical Control Point (HACCP) principles. You may need to review your procedures to account for any changes you have implemented and consider where additional thorough cleaning is needed.

You should consider the need for additional verification of your existing controls, or validation of any new controls that have been introduced. You should document any changes you make to your HACCP and inform your local food authority, or for some meat plants the FSA, of any relevant changes.

Staff should be fit for work at all times. This means they must not be suffering from, or carrying, an illness or disease that could cause a problem with food safety. During COVID-19, staff who are displaying symptoms of the disease should follow the government's Stay at home and Staying safe outside your home guidance. Public Health England have published guidance showing the return to work process for a symptomatic worker once they have been tested for COVID-19.

You must make sure that staff understand your Fitness to Work policy and are aware of any updates that have been made in relation to COVID-19. You may wish to consider any appropriate changes to your visitor questionnaires to address COVID-19 exposure risks.

Managing stock levels

Stock control

Food manufacturers should ensure that any ingredients or raw materials that have passed their

use-by date are disposed of appropriately. You should also inspect stocks for damage and check temperature control records. You should not use ingredients or raw materials where the integrity of packaging is not intact or where temperature logging and alarm systems indicate food safety may have been compromised.

Availability of raw materials and ingredients

You should check that you can obtain your usual raw materials and ingredients so that your product specifications can be met. You should ensure that any new suppliers or contractors meet your requirements. This should be specified in your HACCP or HACCP-based Food Safety Management System (FSMS).

Availability of consumables

You should check that you have adequate stocks of suitable cleaning chemicals and that they are in-date. This also applies to other essential consumable items such as disposable gloves.

Allergen management

If your suppliers or ingredients have changed, you will need to review your allergen management and labelling in line with your HACCP or HACCP-based FSMS. See Allergen labelling for food manufacturers for further guidance.

Machinery

Machinery and equipment that has been idle may need cleaning, inspection and testing to ensure it is capable of normal function. Metal detection and temperature probe equipment may need recalibration in line with the manufacturer's instructions and your HACCP plan. Computer systems, date coding and ingredients labelling may need to be updated.

Staff training

By law, food business operators must ensure that food handlers receive the appropriate supervision and training in food hygiene. This should be in line with the area they work in and will enable them to handle food in the safest way. In the UK, food handlers don't have to hold a food hygiene certificate to prepare or sell food.

The skills taught in official training programmes can also be learned by:

- training on the job
- self-study
- relevant prior experience.

You should reconsider training needs for your staff, including any changes such as those made to procedures, recipes and other hygiene measures. We provide online training resources and Safer food, better business packs that can be used as a training aide.

Personal Protective Equipment (PPE)

The use of Personal Protective Equipment (PPE) in the food industry can be for the protection of workers, and where appropriate to prevent the contamination of food during food production. The current situation should not change these requirements.

You should continue to ensure that the use of PPE is as set out in your Food Safety Management System (FSMS), and in line with your current Health & Safety at Work policies. You should:

- stress the importance of more frequent handwashing and maintaining good hygiene practices in food preparation and handling areas. Employees should wash their hands for at least 20 seconds, especially after being in a public place, blowing their nose, coughing, or sneezing.
- ensure that objects and surfaces that are touched regularly, are frequently cleaned, and disinfected using your regular cleaning products.

Gloves

The Food Safety and Hygiene legislation requires that you provide safe food and have appropriate hygiene procedures in place. Some businesses may implement a glove-use policy but the wearing of gloves by personnel handling food is not a legal requirement.

The best way in which food handlers can maintain good personal hygiene is by frequently washing their hands. Gloves can be used as an aide to good food hygiene practice but should not be considered a substitute for a thorough regime of effective hand washing. The COVID-19 virus (and other viruses as well as bacteria) can contaminate disposable gloves in the same way it gets onto workers' hands.

If gloves are used, they should be changed as often as you would wash hands and you must wash your hands when changing or removing gloves. Gloves must be changed after carrying out non-food related activities, such as opening and closing doors by hand, handling money and emptying bins. Food workers should avoid touching their mouth and eyes when wearing gloves.

Face masks

There may be situations where you provide face masks to protect high-risk foods or where workers are exposed to airborne risks. If so, you should continue to follow your current policies on the use of face masks.

Follow your established procedures for use of PPE in the working environment. You should also take into account social distancing guidance.

Face coverings

The government has published guidance for businesses on wearing face coverings.

From 24 September, it is compulsory in England for retail, leisure and hospitality staff to wear a face covering in areas that are open to the public and where they come, or are likely to come, within close contact of a member of the public. This includes shops, supermarkets, bars, pubs, restaurants, cafes, and the public areas of hotels and hostels.

Inappropriate use and handling of face coverings could present a risk to food safety and hygiene as well as to the health and safety of staff. The government has provided guidance on how to wear a face covering and the hygiene requirements for safe and effective use, maintenance and disposal.

Where it is compulsory for your staff to wear face coverings in the workplace or where your staff choose to wear face coverings to travel to work, you should put procedures in place to enable

your staff to follow this guidance.

For other indoor settings, employers should assess the use of face coverings on a case by case basis depending on the workplace environment, other appropriate mitigations they have put in place and whether reasonable exemptions apply.

Different rules exist in different parts of the UK. You can find out more on the use of face coverings in Wales, Northern Ireland and Scotland.

Social distancing

It will not always be possible to keep a distance of 2 metres. In these circumstances both employers and employees must do everything they reasonably can to reduce risk.

Working safely during COVID-19 in a factory, plant or warehouse contains more guidance on how to implement social distancing at work and steps you can take to reduce the risk of spreading coronavirus.