To help employers in regulated human and animal food operations navigate ongoing challenges from the coronavirus (“COVID-19”) pandemic, the U.S. Food and Drug Administration (“FDA”), Centers for Disease Control and Prevention (“CDC”), and Occupational Safety and Health Administration (“OSHA”) have joined in publishing the sixteen page “Employee Health and Food Safety Checklist for Human and Animal Food Operations During the COVID-19 Pandemic” (“Checklist”). Without adding new guidance, the Checklist offers food employers with human and animal food operations a “quick reference” guide on measures the FDA, CDC, and OSHA believe are necessary to protect workers and operations from COVID-19 exposure risks, including health monitoring, social distancing, and food safety measures.

In the Checklist’s first section identifies key preventive measures for employees’ health and safety, with specific focus on COVID-19 hazard assessments and controls,
employee health monitoring, and implementation of social distancing and infectious disease control and prevention practices. The Checklist also emphasizes the need for these preventive measures and controls to be communicated to employees through signage, demarcations around the facility, and employee trainings. The Checklist further emphasizes the need for employers to have a plan for managing a COVID-19 case and potential outbreak, including plan to identify and isolate sick employees, collaborate with local public health authorities, and ensure effective notification of potential COVID-19 exposures.

The Checklist’s second section shifts to focusing on food safety measures. This portion of the Checklist showcases having a food safety plan or Hazard Analysis, and Risk-Based Preventive Controls or a HACCP plan to identify and control potential hazards, which contemplates the impact of COVID-19 circumstances. For example, the Checklist directs regulated human and animal food operators to plan for a potential scaling back of operations due to worker absenteeism or unavailability of ingredients from manufacturing delays. The Checklist also iterates the importance of current good manufacturing practices, basic sanitation measures, and food safety protocols to prevent food contamination.

All in all, the Checklist is not a standard, regulation, or new agency guidance and as such does not create any new legal obligations. The Checklist does, however, provide a comprehensive list of standards, regulations, and federal agencies have determined are applicable to regulated human and animal food operations in response to COVID-19. For the reasons, the Checklist can be helpful for employers in this industry to assess their operations and adequacy in COVID-19 response planning.

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