protecting PEI seafood industry workers during the COVID-19 pandemic

A Guidance Document for Seafood Processors Employing Temporary Foreign Workers

PEI Chief Public Health Office
4/16/2020

The advice in this document was prepared in consultation with guidance offered by the British Columbia Centre for Disease Control (BCCDC) and the Ministry of Health’s, COVID-19: Interim Communicable Disease Control Guidelines for Industrial Camps. During the current COVID-19 pandemic, the PEI Chief Public Health Office is the best source for COVID-19 health information.
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INTRODUCTION

This document outlines recommendations for all sponsoring employers to meet the orders, notices, and guidance issued by Prince Edward Island’s Chief Public Health Officer for processors employing Temporary Foreign Workers (TFWs) and domestic workers. The requirements apply to workers in PEI under the TFW programs. Detailed information, checklists and tools to help complete the requirements are found in the linked documents.

TFWs are visitors to Canada who are away from their families and may be unfamiliar with Canadian safety and health care systems. This document will help employers understand the additional requirements for protecting the health of TFWs, including ensuring that those workers are aware of how to seek help if they are ill or unwell.

The advice in this document was prepared in consultation with guidance offered by the British Columbia Centre for Disease Control (BCCDC) and the Ministry of Health’s, COVID-19: Interim Communicable Disease Control Guidelines for Industrial Camps. During the current COVID-19 pandemic, the PEI Chief Public Health Office is the best source for COVID-19 health information.

This document will be updated periodically as new information becomes available.

Please continue to check for new information and refer to the following links to public health resources in the event that any embedded link is broken and does not work:

Section 1: WHAT YOU NEED TO KNOW ABOUT COVID-19

COVID-19 has been declared a global pandemic. Coronavirus is transmitted via larger liquid droplets when a person coughs or sneezes. The virus can enter through these droplets via the eyes, nose or throat if you are in close contact with an infected individual.

It can be spread by touch if a person has used their hands to cover their mouth or nose when they cough. That’s why we recommend you cough or sneeze into your arm and wash your hands regularly. Just like in other businesses, seafood processing employers are expected to implement the guidance and orders of the Chief Public Health Officer. There are two key areas that can help break the chain of transmission.

1. **All Employees and Employers Must Increase Handwashing, Practice Good Respiratory Etiquette and Cleaning**

   Limiting potential transmission of COVID-19 requires all employers and employees to practice increased handwashing and implement improvements to overall respiratory etiquette and increased cleaning.

2. **Practice Physical Distancing**

   Physical distancing of at least 2 meters should be maintained, where possible, at all times. Employers should take practical steps to ensure physical distancing is maintained.

For additional information about COVID-19, go to this link: [ABOUT COVID-19](#).

For non-medical information about COVID-19 you can also call 1-800-958-6400 7 days a week and someone will return your call within 24 hours.

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Section 2: PEI SPECIFIC GUIDANCE FOR EMPLOYERS OF TFWs DURING 14 DAY SELF-ISOLATION PERIOD

As per the Public Health Order in effect in PEI, every person entering the province must self-isolate for 14 days. This requirement also applies to all TFWs entering the province. The PEI government has arranged a designated location for all TFWs (other than those exempt due to other approved arrangements) entering the province to complete this requirement. This is to ensure consistent processes and decrease any possible errors or misunderstandings of the self-isolation process. This proactive approach was chosen to enable physical separation between workers during the self-isolation period, facilitate health monitoring by a registered nurse, and to ensure that TFWs have not developed any symptoms of COVID-19 before reporting to work with the employer. It is also hoped that the proactive approach will reduce the overall stigmatization of the TFWs as they arrive here and give Islanders more reassurance that the proper processes to prevent the introduction and spread of COVID-19 in PEI have been enforced.

At the end of the TFW’s self-isolation period, the PEI government will arrange for the TFW(s) to be transported to the location provided by the employing seafood processor. For the remainder of the TFW’s time in PEI, the employer assumes responsibility for housing and ensuring that the worker follows all health and safety requirements.
Section 3: STEPS THAT EMPLOYERS MUST FOLLOW TO ADDRESS COVID-19 AFTER TFWs COMPLETE THEIR 14 DAY SELF-ISOLATION PERIOD

1. **Guidance for COVID-19 and PEI TFW Accommodations**
   The following COVID-19 protocols must be followed in the housing of TFWs. (For TFWs not in an isolation period, or under specific direction from the Public Health Office, and those TFWs in Canada prior to March 18, 2020 not exhibiting symptoms.) This guidance also applies to any accommodations provided by an employer for housing any employee:

   **Physical distancing general guidance:**
   - It is recommended that gatherings of any size be structured so that those present can maintain a distance of 2 meters from each other.
   - Reduce in-person meetings and other gatherings and hold site meetings in open spaces or outside.
   - Shared accommodations should be arranged in such a fashion that beds are at least 2 meters apart and oriented head-to-toe. Use temporary barriers between beds, such as curtains, to prevent droplet spread while sleeping.
   - None of the employees in an accommodation can be ill or meet a criterion that requires self-isolation. Any employees that are ill or require self-isolation must be immediately moved into separate facilities. 811 must be called immediately to report symptoms and receive further direction. The Chief Public Health Office should also be notified (902-368-4996) if a TFW is sick and referred for testing through the 811 call.
   - Employees may be designated to small living groups that may share accommodations and facilities through the duration of their employment. This is essentially simulating a family unit/household environment. These living groups can be carried through to form small work task groups and are worth considering from an infection control perspective.

2. **Employee Education**
   On the first day of work all employees should participate in a COVID-19 training and education session provided by the employer. After initial training, employers should at least weekly, remind employees about COVID-19 physical distancing, hygiene and reporting illness. Reminder training can be implemented weekly to reinforce the COVID-19 physical distancing, hygiene and reporting illness.

   Training should include safety measures and protocols, physical distancing, proper hygiene practices, and monitoring and reporting illness.

   Training and education will need to be available in both English and the language best suited for the employees.

   Post signs to reinforce training that illustrates how employees and occupants can protect themselves and others at the facility. Consider posting signs at entrances and in bathrooms.

   **Links to posters for printing and posting:**
   - Hand hygiene poster
     https://www.princeedwardisland.ca/sites/default/files/publications/clean_hands_poster_8.5x11web.pdf
   - COVID-19 Public Health Advice Poster
3. **Employee Self-Isolation**

If an employee becomes ill with COVID-19 like symptoms (new/worsened cough, feverish/chills, difficulty breathing, runny nose, sore throat, headache, congestion), self-isolation measures must be put into place immediately.

- Employers of TFWs are expected to have a space prepared to accommodate any self-isolation required during their employment.
- The TFW or employer (on their behalf) should contact 811 and facilitate a referral for testing.
- Detailed instructions for self-isolation can be found on the PEI government website: [COVID-19 Self-Isolation](#).
- The TFW would need to self-isolate until test results return negative.
- If the COVID-19 testing is positive, then public health nursing will conduct contract tracing and provide further instruction.
- Employees that are identified as close contacts of someone with COVID-19 will be contacted by Public Health Nursing and must also self-isolate for 14 days.
- Close contact employees must self-monitor for symptoms and contact 811 if symptoms develop during the 14 days of self-isolation.

4. **Policy for When Self-Isolation Is Required**

Employers should consider developing or updating a common work-place policy regarding what to do when employees are ill, and monitor staff regularly for COVID-19 like symptoms:

5. **Guidance for Effective Hand Hygiene and Cleaning/Sanitizing Practices**

Limiting potential transmission of COVID 19 requires all employers and employees to practice increased hand hygiene and cleaning/sanitizing. Supporting good hand hygiene and respiratory etiquette helps prevent or reduce the spread of COVID-19 and other illness. Additional information for employers to implement with employees includes:

- Employees must be educated on measures to prevent infection and transmission. Employers must display these practices while with employees, including diligent hand washing with soap and water or use of hand sanitizer with a minimum 60% alcohol.
- Post signs that illustrate:
  - The importance of hand washing.
  - Cover your mouth and nose with a disposable tissue or the crease of your elbow when you sneeze or cough.
  - Dispose of used tissues immediately.
  - Avoid touching your face, eyes, nose or mouth with unwashed hands.
- As part of the daily safety briefing, employees will be reminded of measures to prevent infection and transmission. Posters and printed reminders must be displayed in conspicuous places.
5.1 Guidance for Increased Hand Hygiene and Personal Practices

Frequent handwashing and avoidance of face touching can prevent infection transmission. Employees are to be advised of the following:

- If you are sick, do not prepare or handle food for others.
- Do not share food, plates, cups or utensils.
- Practice good respiratory and hygiene etiquette:
  - Cough or sneeze into elbow sleeve.
  - Dispose tissues immediately in garbage cans.
  - Wash hands with soap and water for at least 20-30 seconds or use an alcohol-based sanitizer
    - Note that if a person’s hands are visibly soiled it is acceptable to use wipes to remove dirt and then use hand sanitizer.
  - Avoid touching one’s face.

Hand hygiene is most important at the following times:

- Before eating or preparing food.
- After coughing, sneezing, or blowing one’s nose.
- Before and after contact with an ill person.
- After touching dirty surfaces such as taps and doorknobs, and
- After going to the bathroom.

Employers must provide a suitable number of handwashing stations for the size of the work site and post signage that identifies their location or provide wipes to remove soil and hand sanitizer with a minimum 60% alcohol.

Hand washing

- Hand washing stations with soap and water must be made available to employees in all areas that employees are working in or eating food.
- Hand washing stations should be checked, cleaned, and restocked with supplies three times a shift.
- Liquid soap and water hand washing stations can be supplemented with waterless hand sanitizers with a minimum 60% alcohol where appropriate.
- Hand washing periodically throughout the day and especially before and after break times or when tools or tasks are switched must be encouraged as much as possible.
- Hand washing instructions and reminders will be posted in both English and the language appropriate for the employees at all hand washing stations.
6. Guidance for Increased Cleaning Requirements
All common areas and surfaces should be cleaned at the start and end of each day or more often as needed. Examples of common areas and surfaces include washrooms, shared offices, common tables, desks, light switches, and door handles. Regular household cleaners are effective against COVID-19, following the instructions on the label.

6.1 General Living Space
Cleaning protocols will be created and posted throughout all TFW facilities, in both English and the language that is fluent for the TFW.
- The employer is to ensure that cleaning products are readily available, monitored daily and restocked as required.
- Employees are required to disinfect:
  - shared areas (kitchen & bathroom counters, handles and control switches) and high-touch surfaces (e.g., counters, handles, control switches) a minimum of twice per day (or more often as required) with regular household cleaning products, disposable wipes or a diluted bleach solution.
- Surfaces must be sufficiently clean before disinfecting. Employees are to be instructed to follow the directions on the product label.

6.2 Common Areas
- Common areas and surfaces should be cleaned at the end of each day. Examples include washrooms, shared offices, common tables, desks, light switches, and door handles.
- Employees must not share items such as eating utensils, towels, glasses, etc.
- Post PEI Government Hand Hygiene Posters

6.3 Vehicles
It is recommended to regularly clean and disinfect frequently touched surfaces in the vehicles. Drivers should focus on disinfecting key contact points in their vehicles using an alcohol-based cleaner or disinfecting wipes/spray and paper towel; if these are unavailable, use soap and water.

Key contact points are:
- Door handles (inside and out)
- Window buttons
- Steering wheel and controls
- Wiper and turn signal handle
- Shifter
- Dash controls + buttons
- Ventilation grilles and knobs
- Rear-view mirror
- Armrests
- Grab handles, seat adjusters
- Seat belt buckles
7. Guidance for Practicing Physical Distancing and Hygiene

Physical distancing of at least 2 meters should be maintained, where possible, at all times. In situations where maintaining physical distance of 2 meters is difficult, a physical barrier may be effective. When more than one worker is traveling, physical distancing practices apply. Shared travel with more than one person should be minimized. Employers may use the following options:

7.1 During Employee Transportation

Specific guidance on ways to manage transportation is provided below. In general, where employees are required to work together in close proximity to complete tasks, the employer may designate employees to small working groups which could travel together to work in the same vehicle. The same people should stay together for the duration of their employment. The employer must keep a record of which individuals are working in groups, and these work groups should be maintained in the same residence.

Buses & Vans
- Load and offload passengers by the rear doors if possible or establish a rule that the driver is last-on, first-off of the bus.
- Allow enough time for passengers to disembark from vehicles to allow for adequate distancing and prevent crowding.
- Create spacing between riders such as staggering where people sit (e.g. aisle to window, alternating per row).
- Consider installing physical barriers that can minimize spread of droplets.
- Consider having the bus wiped down (e.g. seat backs and other commonly touched areas) before and after trips, and at the start and end of each work-day.
- Handwashing facilities or sanitizer must be made available before and after the bus ride.

Truck & Car
- Where possible limit to a single driver in a conventional truck (i.e., singlecab),
- A driver and one passenger may travel together in vehicles with two rows of seating. The passenger should sit in the back seat on the opposite side as the driver.
- The only exception to this is family members, or a work unit of no more than 5 employees.
- Hands should be washed thoroughly before and after the truck ride and common surfaces should be wiped down before and at the end of each trip.

7.2 While Working (e.g., Processing Lines)
- Where possible, employees should be assigned to individual workstations or an area within the plant that provides 2 meters of separation from other individuals.
- Where 2 meters separation is not possible, a physical barrier may be constructed, and workers should always ensure that hands are washed with plain soap and warm running water or a hand sanitizer with a minimum 60% ethyl alcohol before and after work activity.
- In situations where employees are required to work together in close proximity to complete tasks, the employer may designate employees to small working groups. The same people should stay together for the duration of their employment. The employer must keep a record of which individuals are working in groups, and these work groups should be maintained in the same residence.
7.3 **During Breaks or While in Communal Spaces (e.g., Processing Plants)**
- Start/stop times, breaks should be staggered where possible to minimize employees congregating.
- Employers should reduce in-person meetings, other gatherings and hold site meetings in open spaces or outside.
- It is recommended that worker gatherings of any size be structured so that those present can maintain a physical distance of 2 meters from each other.
- Wash your hands: before and after breaks, and before preparing or eating food.

7.4 **Handling Tools and Equipment**
- Where possible, each employee should be supplied with their own tools to be used throughout the duration of their employment (e.g., knives).
- Employees must receive training on cleaning tools and must be offered assistance to ensure compliance and understanding of handwashing and hygiene.
- Where it is not possible to provide personal tools, the shared tools and equipment must be wiped down and cleaned with a disinfecting agent such as disposable wipes or a diluted bleach solution between uses by different employees. Rubber gloves should be worn while handling bleach solutions and the area should be well ventilated.
- Employees who use (PPE) and are properly trained in its use (e.g. employees certified and trained to use PPE because of their normal work role) should not share PPE with other employees. Employers must establish a labeling system to help with organization of this equipment.
- In situations where employees are required to work together in close proximity to complete tasks, the employer may designate employees to small working groups.
- These employees may be organized into small working groups that may share tools. The small working groups will have the same employees throughout the duration of employment. For this scenario, shared tools will be cleaned and disinfected at the end of each shift.
- **The small groups of employees should stay together for the duration of the project. The employer must keep a record of which individuals are working in small groups. The work groups should also be maintained in the same residence as small groups.**

8. **Guidance for Situations Where Maintaining Physical Distance of 2 Meters is Difficult**
Food production is an essential service and, in some situations, it is not possible to maintain production while respecting the 2 meter separation. **In preparation for COVID-19, please do not buy personal protective equipment (PPE) unless it is needed as part of the job (e.g. handling certain chemicals).**
The following guidance provides employers methods to achieve physical distancing when it is difficult to do so:
- An impervious barrier (“Physical barrier”) can be installed between workstations (people). The barrier must be something that prevents one person’s cough or sneeze from contacting another person. The barrier must be made of a non-porous material that can be effectively disinfected. Regular household cleaning products are effective against COVID-19. Follow the instructions on the product label.
- Barriers will be site specific and must be installed in such a way as to minimize risk of cross contamination. An example of this is the Plexiglass barriers that some retailers have installed to protect cashiers in retail stores.
SECTION 4: ADDITIONAL GUIDANCE FOR PROCESSORS EMPLOYING TFWs

TFWs are visitors to Canada, who are away from their families and may be unfamiliar with Canadian safety and health care systems. Employers must ensure that TFWs understand all the additional requirements and be aware of how to seek help if they are ill or unwell to support reporting and ensure they get any assistance they may need.

1. TFWs in the Community
   - Traveling to a grocery store or other necessary public establishment should be limited to one TFW per group who will also buy food and essentials for other TFWs. This is similar to the direction provided to all Islanders at this time.
   - Reminders should be posted in the living space to regularly wash hands, practice coughing etiquette, maintain physical distancing in the community and avoid congregating in social settings or community settings.

2. TFW Accommodations
   Employers are responsible to provide or ensure that suitable and affordable housing for TFWs is available. Employers must coordinate with the PEI government in preparing for the need to make housing provisions for three situations:
   - During isolation periods
     - During the first 14 days when TFWs enter PEI, at a location arranged by the government of PEI, and
     - For TFWs that have come in contact with someone with COVID-19 as identified by the Chief Public Health Office.
   - During Illness
     - If a TFW develops any symptoms of COVID-19 or is confirmed COVID-19 positive.
   - General housing conditions
     - Applicable when neither of the previous two conditions apply
     - For post-isolation, where TFWs are not diagnosed and in isolation, housing will be under ‘normal’ circumstances as per the conditions noted in the employer compliance section of your agreement.
     - The normal housing requires certain COVID-19 protocols.

3. Employer Responsibilities
   - Communicating with the Chief Public Health Office or Office of Immigration regarding:
     - Expected arrival dates/times of workers
     - Number of workers arriving
     - Names of workers
     - Planned housing location while employed by the processor.
   - Following all direction from the PEI government regarding COVID-19.

4. TFW Responsibilities
   - Following recommendations outlined by the PEI government and, where applicable, requirements provided by the Chief Public Health Office.