MANAGING BUSINESS RISK, HEALTH & SAFETY COMPLIANCE, AND BEST PRACTICES

DISTILLED SPIRITS COUNCIL OF THE UNITED STATES
STRATEGIZE TO COMBAT THE CHALLENGES

1. **Best Case Scenario** – Company can return quickly to normal operations. An urgency to get back to normal cadence of work is likely and so will be the confusion over the priorities of production versus safety.

2. **Plan for Worst Case Scenario** - Stay home orders are extended or are reinstituted if the virus creates a second wave of mass infection. Operations could cease or continue with a skeleton crew of employees.

3. **Most Likely Scenario** – Slow to return to normal with employees brought back in a prioritized, phased, or staggered approach. Implement experts’ preventive measures. Jobs and the working environment will need to be redesigned to accommodate this reality for the foreseeable future.

*Every company’s efforts will be different.*
PHASES OF EMERGENCY MANAGEMENT CYCLE

1. Mitigate
   Efforts to reduce risks.

2. Prepare/Prevent
   Actions taken prior to an emergency to facilitate response and promote operational readiness.

3. Respond
   Integrated actions taken in accordance with strategic priorities.

4. Recover
   Actions taken after an emergency to restore and resume normal operations.

Continuity
Actions taken to protect the organization from disruption. Continuity influences all four planning phases of Emergency Management.
SAFETY/ BUSINESS RISK/ PR NIGHTMARE
SCENARIO: EMPLOYEE TESTS POSITIVE FOR COVID-19

- Follow Reporting Process
- Review Policy
- Assess Risk
- Take Action
  - Close off and disinfect
  - Self-isolate at-risk employees
  - Inform organization

*Maintain confidentiality*
RISK EXPOSURE LEVELS FOR JOB TASKS

Classify personnel by job task:

- **Very High** and **High** exposure to known or suspected sources – mainly healthcare
- **Medium** exposure due to frequent/close contact with the public or other co-workers
- **Lower** exposure due to minimal contact with the public or other co-workers

Evaluate:

- Need for contact within 6 feet
- Conditions in communities
- Activities outside of work
<table>
<thead>
<tr>
<th>Severity</th>
<th>Classification</th>
<th>Safety</th>
<th>Equipment/Maintenance Cost</th>
<th>Production</th>
<th>Environmental</th>
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</thead>
<tbody>
<tr>
<td>5</td>
<td>Catastrophic</td>
<td>Lethal effect on several persons (several fatalities)</td>
<td>Major damage $6M-$9M</td>
<td>Major loss. Up to 50% not recoverable</td>
<td>Major pollution external to the site</td>
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<tr>
<td>4</td>
<td>Major</td>
<td>Lethal effect on one person and/or several permanent maladies. Permanent external effects</td>
<td>Localized damage $2M - $6M</td>
<td>Medium loss, not wholly recoverable through normal production</td>
<td>Moderate pollution, within site limits. Product liability</td>
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<td>3</td>
<td>Serious</td>
<td>Permanent injury, long term accident, Non-permanent external effects</td>
<td>Minor damage $200K - $2M</td>
<td>Minor loss, recoverable through normal production 2 to 8 hours lost production</td>
<td>Spill or release of pollutant requiring a declaration to authorities but without environmental consequences</td>
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<tr>
<td>2</td>
<td>Moderate</td>
<td>No permanent injury, recordable with no lost time/medical treatment. No external effect</td>
<td>Slight damage &lt; $200K</td>
<td>Little to no effect. Production easily recovered. &lt; 2 hour lost production.</td>
<td>Minor spill or release of pollutant, not requiring a declaration</td>
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</tbody>
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### Human Impact
- Travel
- Work Areas
- Job Activities

### Business Impact

### Property Impact

### Environmental Impact

### Organizational Operations (Who)
Hierarchy of Controls

- **Elimination**: Physically remove the hazard
- **Substitution**: Replace the hazard
- **Engineering Controls**: Isolate people from the hazard
- **Administrative Controls**: Change the way people work
- **PPE**: Protect the worker with Personal Protective Equipment
<table>
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<th>Administrative &amp; Safe Work Practice Controls</th>
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<tbody>
<tr>
<td><strong>Stagger Start/End Times, Breaktimes</strong></td>
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<tr>
<td><strong>Limit Number of People Allowed at Any One Time</strong></td>
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<tr>
<td><strong>Establish Social Distancing in Parking Lots, Break Areas, Locker Rooms, Company Vehicles</strong></td>
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<tr>
<td><strong>Integrate Virtual Meetings</strong></td>
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<tr>
<td><strong>Evaluate Contractor Pandemic Preparedness &amp; Response Plan, Protocols, JSA</strong></td>
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<tr>
<td><strong>Define Essential Contractor Work on Priority Need &amp; Devise Proper Notification</strong></td>
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<tr>
<td><strong>Update Visitor/Contractor Safety Briefings &amp; New-Hire Orientation</strong></td>
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<tr>
<td><strong>Devise Virtual COVID-19 Q&amp;A Portal or App</strong></td>
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<tr>
<td><strong>Create Hand-Over Stations for Disinfecting of Shared Equipment/Tooling</strong></td>
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<tr>
<td><strong>Assign Two-Way Radios and Cleaning Protocol if Shared Between Shifts</strong></td>
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<tr>
<td><strong>Temporarily Suspend Recreational Activities on Company Property</strong></td>
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ADMINISTRATIVE & SAFE WORK PRACTICE CONTROLS

- REVIEW SUBSTANCE ABUSE TESTING POLICY
- DEMARCATE STAGING AREAS FOR ESSENTIAL VISITORS/CUSTOMERS
- PROVIDE ADEQUATE SUPPLY OF PPE, SOAP, DISINFECTANTS/CLEANERS, SANITIZER, TOWELETTES, TISSUES, ETC.
- IMPLEMENT AREA CLEANING SCHEDULES & HAZARD COMMUNICATIONS TRAINING, SDS, AND CLEANING PROCEDURES
- IMPLEMENT GO/ NO GO SIGNS FOR EASY VISUALS OF CLEAN SURFACES
- RESTRICT ALL NONESSENTIAL VISITORS
- ENSURE COMMUNICATIONS ARE EXPLICIT IN CORRESPONDING LANGUAGE(S)
- UPDATE JSA FOR EACH ACTIVITY REQUIRING CLOSE CONTACT (<6 FEET)
- DESIGNATE ISOLATION AREAS
- EVALUATE IMPLEMENTATION OF SELF-MONITORING PRIOR TO COMING INTO WORK
- EVALUATE MONITORING ALL EMPLOYEES, CONTRACTORS, & VISITORS DAILY PRIOR TO ENTRY INTO FACILITY
- CONDUCT PPE ANALYSIS, DETERMINE REQUIRED PPE, TRAIN PERSONNEL
ASSIGN ONE OPERATOR PER SHIFT
Disinfect all touch points inside & out prior to shift entry
PRE-ENTRY MONITORING
Determine your procedure and criteria
EVALUATE OPTIONS
FIELD WORK/TRAVEL RISK ASSESSMENT

- Eating
- Hotel
- Flights
- Vehicle Rental
- Positive Cases
CONDUCT PRE-WORK HAZARD ASSESSMENT/INSPECTIONS
WATCH OUT FOR WILDLIFE, ETC.
They love a stop or lull in operational activities
GUIDANCE ON USE OF CLOTH FACE COVERS

To the extent practical without significantly impacting work, determine if cloth face coverings are necessary when personnel cannot maintain at least 6 feet distance during work activities. Prepare guidance and training on donning, doffing, cleaning, and maintaining coverings with company instructions. Face coverings should cover the mouth and nose.

*Cloth face covering does **NOT** prevent the wearer from getting sick but may prevent the spread of the virus from the wearer to others.

CONDUCT PPE ASSESSMENTS

*Face Masks*
*Neck Gaiters/Warmers*
*Balaclavas*

*N-95 and surgical masks should be reserved for health care workers.*
Obligations under federal Families First Coronavirus Response Act (FFCRA)

ELIGIBLE EMPLOYEES

The Families First Coronavirus Response Act (FFCRA or Act) requires certain employers to provide their employees with paid sick leave and expanded family and medical leave for specified reasons related to COVID-19.

These provisions will apply from April 1, 2020 through December 31, 2020.

In general, employees of private sector employers with fewer than 500 employees, and certain public sector employers, are eligible for up to two weeks of fully or partially paid sick leave for COVID-19 related reasons.
QUALIFYING REASONS FOR LEAVE RELATED TO COVID-19

An employee is entitled to take leave related to COVID-19 if the employee is unable to work, including unable to telework, because the employee meets a qualifying reason.
Infectious Disease Preparedness and Emergency Response Plan

Template and Resources