

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

DISTILLED SPIRITS COUNCIL OF THE UNITED STATES



STRATEGIZE TO COMBAT THE CHALLENGES

Mitigate - Prepare – Respond – Recover



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

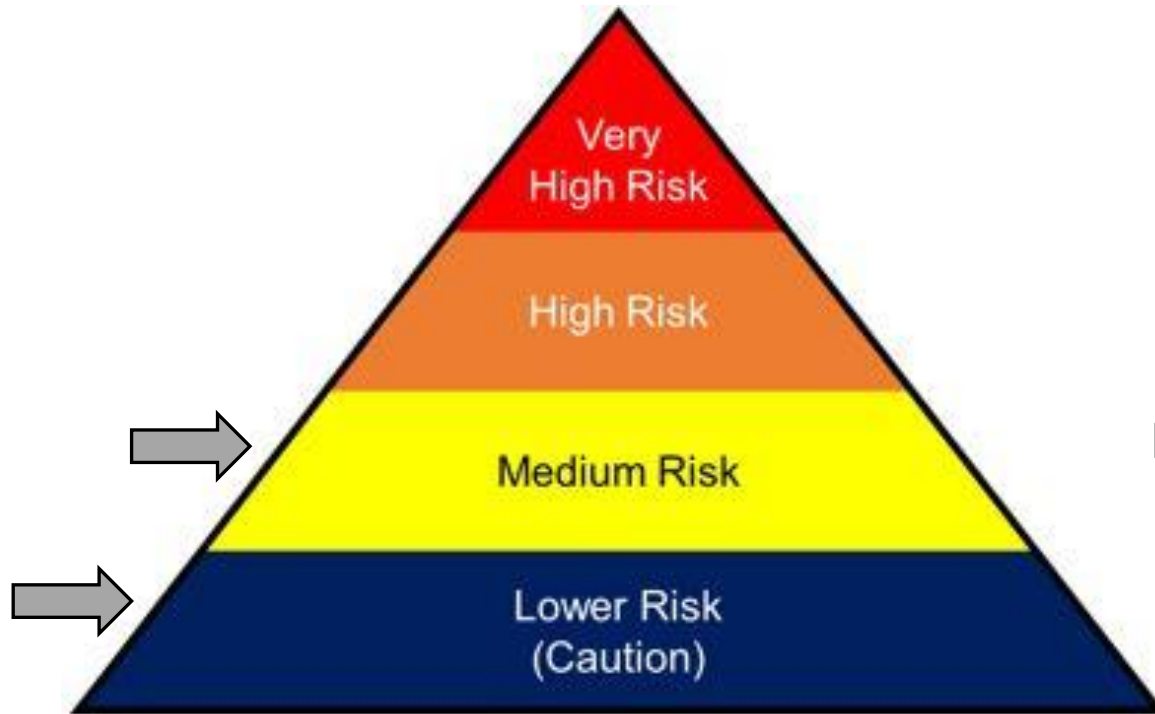


SCENARIO: EMPLOYEE TESTS POSITIVE FOR COVID-19



- 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

RISK ASSESSMENT- FAILURE MODE & EFFECTS ANALYSIS

Human Impact

Business Impact

Property Impact

Environmental Impact

Organizational
Operations (Who)

- Travel
- Work Areas
- Job Activities

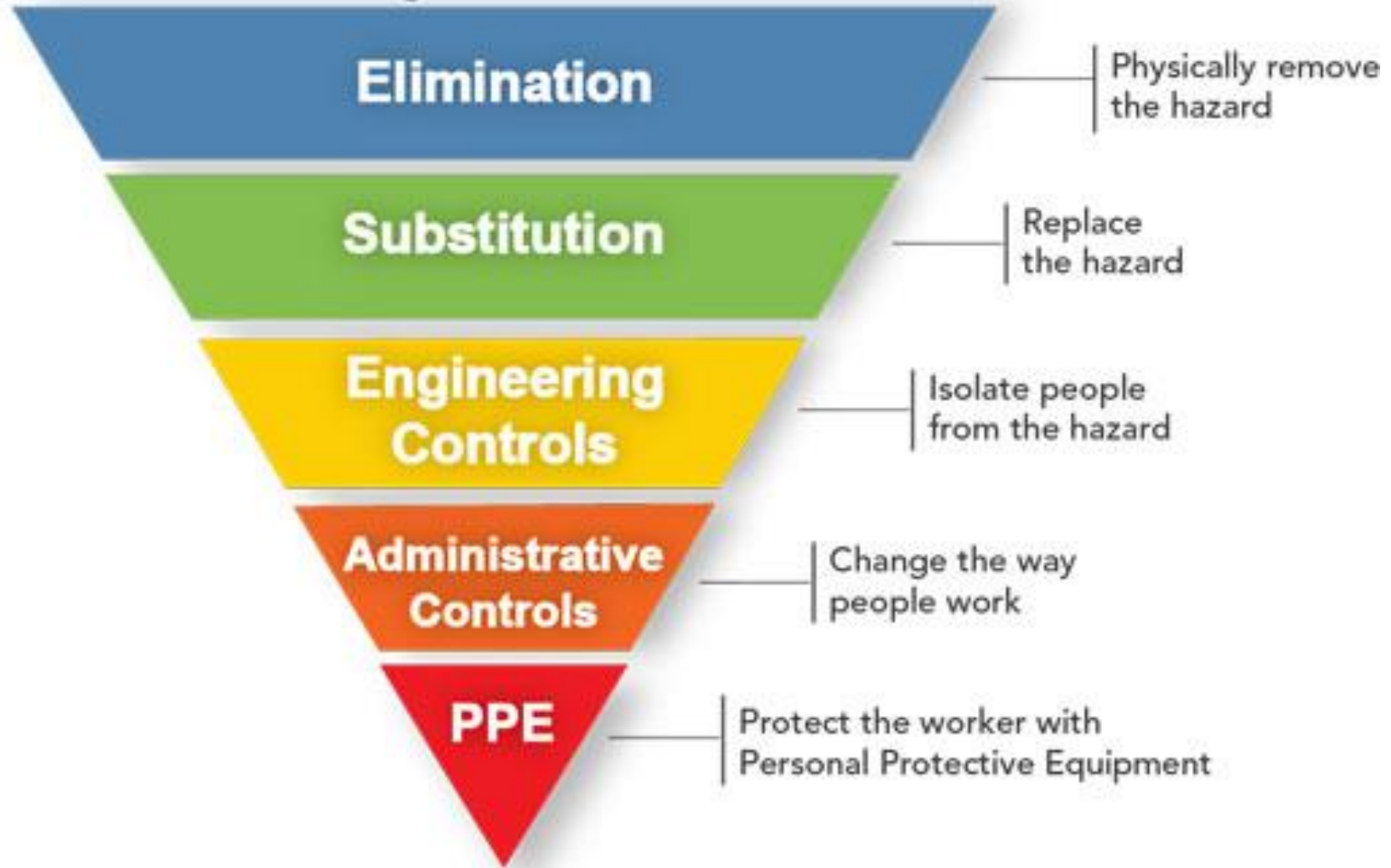
Severity	Classification	Safety	CONSEQUENCES			PROBABILITY				
			Equipment/ Maintenance Cost	Production	Environmental	1	2	3	4	5
						< 1%	1% - 5%	5% - 25%	25% - 50%	> 50%
						Remote	Extremely Unlikely	Very Unlikely	Unlikely	Likely
5	Disastrous	Multiple fatalities, > 5. Large effects on large external inhabited zones-several fatalities	Extensive damage >\$8M	Major loss, not recoverable. More than 3 days lost production	Major pollution with sustained environmental consequences external to the site	5	10	15	20	25
4	Catastrophic	Lethal effect on several persons (several fatalities). Lethal external effect - one fatality, several physical injuries	Major damage \$6M-\$8M	Major loss. Up to 50% not recoverable Up to 3 days lost production.	Major pollution external to the site. Evacuation of persons	4	8	12	16	20
3	Major	Lethal effect on one person and/or several permanent invalidities. Permanent external effects	Localized damage \$2M - \$6M	Medium loss, not wholly recoverable through normal production < 24 hours lost production	Moderate pollution, within site limits. Product liability	3	6	9	12	15
2	Serious	Permanent injury, lost time accident. Non-permanent external effects	Minor damage \$200K - \$2M	Minor loss, recoverable through normal production 2 to 8 hours lost production	Spill or release of pollutant requiring a declaration to authorities but without environmental consequences	2	4	6	8	10
1	Moderate	No permanent injury, recordable with no lost time/medical treatment. No external effect	Slight damage < \$200K	Little to no effect. Production easily recovered. < 2 hour lost production.	Minor spill or release of pollutant, not requiring a declaration	1	2	3	4	5

Hierarchy of Controls

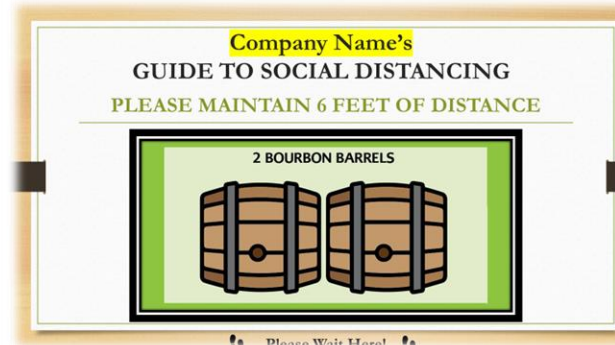
Most
effective



Least
effective



ENGINEERING CONTROLS/ VISUALS



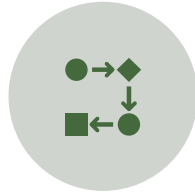
ADMINISTRATIVE & SAFE WORK PRACTICE CONTROLS



STAGGER START/END
TIMES, BREAKTIMES



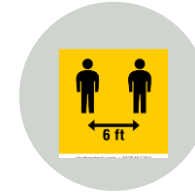
LIMIT NUMBER OF
PEOPLE ALLOWED AT
ANY ONE TIME IN
MEETINGS, WORK
AREAS, ELEVATORS,
BATHROOMS (POST
INSTRUCTIONAL SIGNS)



MAKE ADJUSTMENTS
TO MANUFACTURING
FLOW OR STAFFING



INTEGRATE VIRTUAL
MEETINGS



ENFORCE SOCIAL
DISTANCING IN
PARKING LOTS, BREAK
AREAS, LOCKER
ROOMS, COMPANY
VEHICLES



EVALUATE
CONTRACTOR
PANDEMIC
PREPAREDNESS &
RESPONSE PLAN,
PROTOCOLS, JSA



DEFINE ESSENTIAL
CONTRACTOR WORK
ON PRIORITY NEED &
DEVISE PROPER
NOTIFICATION



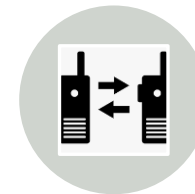
UPDATE
VISITOR/CONTRACTOR
SAFETY BRIEFINGS &
NEW-HIRE
ORIENTATION



DEVISE VIRTUAL
COVID-19 Q&A PORTAL
OR APP



CREATE HAND-OVER
STATIONS FOR
DISINFECTING OF
SHARED
EQUIPMENT/TOOLING



ASSIGN TWO-WAY
RADIOS AND CLEANING
PROTOCOL IF SHARED
BETWEEN SHIFTS



TEMPORARILY
SUSPEND
RECREATIONAL
ACTIVITIES ON
COMPANY PROPERTY

ADMINISTRATIVE & SAFE WORK PRACTICE CONTROLS



REVIEW SUBSTANCE
ABUSE TESTING POLICY



DEMARCATÉ STAGING
AREAS FOR ESSENTIAL
VISITORS/CUSTOMERS



PROVIDE ADEQUATE
SUPPLY OF PPE, SOAP,
DISINFECTANTS/
CLEANERS, SANITIZER,
TOWELETES, 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)



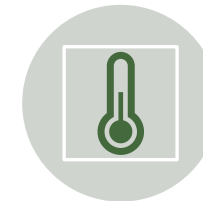
UPDATE JSA FOR EACH
ACTIVITY REQUIRING
CLOSE CONTACT (<6
FEET)



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

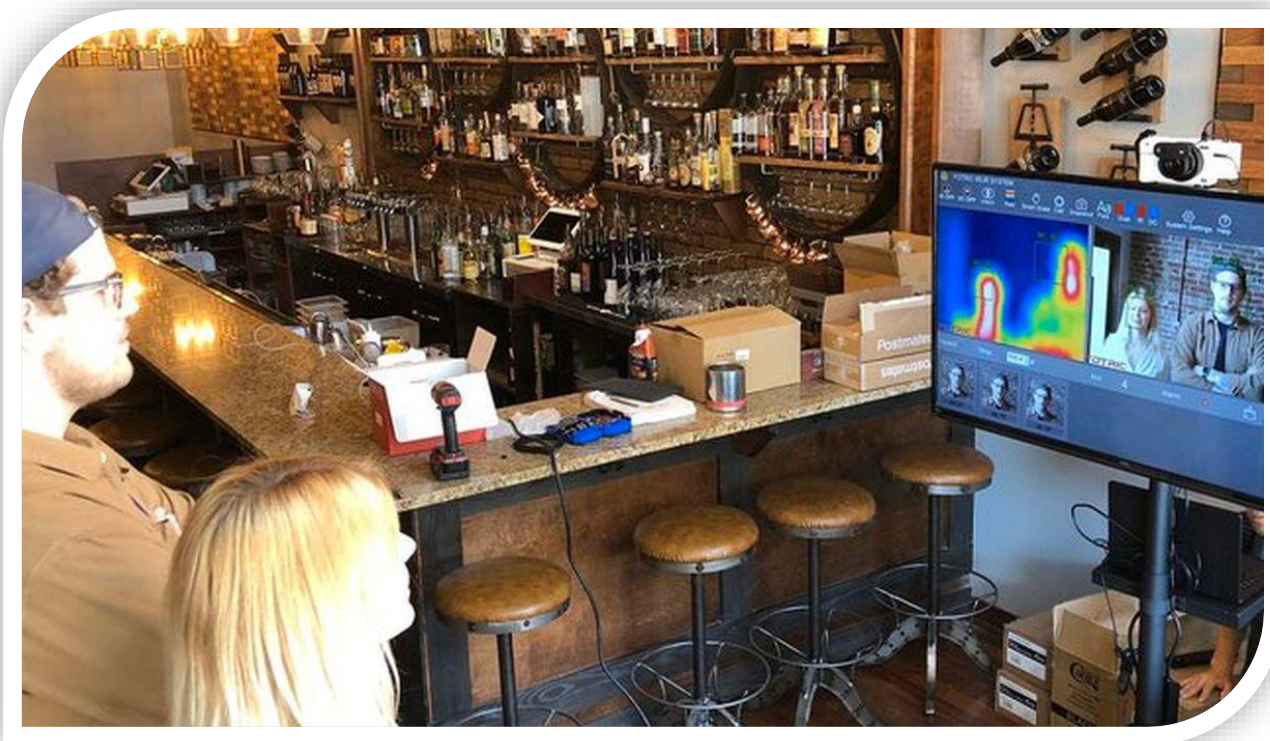


CONDUCT PPE
ANALYSIS, DETERMINE
REQUIRED PPE, TRAIN
PERSONNEL



ASSIGN ONE OPERATOR PER SHIFT

Disinfect all touch points inside & out prior to shift entry



PRE-ENTRY MONITORING

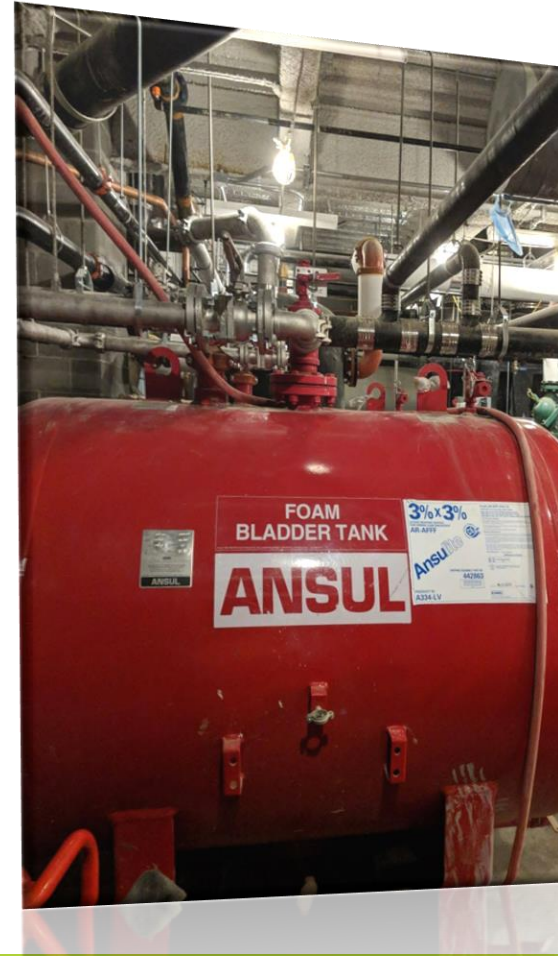
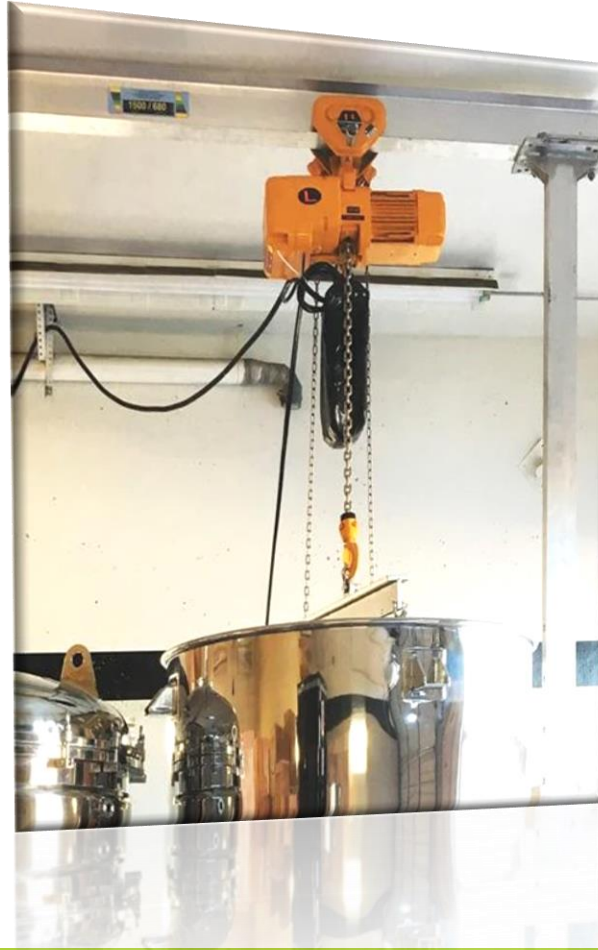
Determine your procedure and criteria

EVALUATE OPTIONS



FIELD WORK/TRAVEL RISK ASSESSMENT





CONDUCT PRE-WORK HAZARD ASSESSMENT/INSPECTIONS



Raccoons



Foxes



Muskrats



Coyotes



Snakes



Hornets/Wasps

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.

HUMAN RESOURCES – LEAVE CONSIDERATIONS



WAGE AND HOUR DIVISION
UNITED STATES DEPARTMENT OF LABOR

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.

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► PAID LEAVE ENTITLEMENTS

Generally, employers covered under the Act must provide employees:

Up to two weeks (80 hours, or a part-time employee's two-week equivalent) of paid sick leave based on the higher of their regular rate of pay, or the applicable state or Federal minimum wage, paid at:

- 100% for qualifying reasons #1-3 below, up to \$511 daily and \$5,110 total;
- ⅔ for qualifying reasons #4 and 6 below, up to \$200 daily and \$2,000 total; and
- Up to 12 weeks of paid sick leave and expanded family and medical leave paid at ⅓ for qualifying reason #5 below for up to \$200 daily and \$12,000 total.

A part-time employee is eligible for leave for the number of hours that the employee is normally scheduled to work over that period.

► ELIGIBLE EMPLOYEES

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 (see below). *Employees who have been employed for at least 30 days prior to their leave request may be eligible for up to an additional 10 weeks of partially paid expanded family and medical leave for reason #5 below.*

► 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:

<ol style="list-style-type: none">1. is subject to a Federal, State, or local quarantine or isolation order related to COVID-19;2. has been advised by a health care provider to self-quarantine related to COVID-19;3. is experiencing COVID-19 symptoms and is seeking a medical diagnosis;4. is caring for an individual subject to an order described in (1) or self-quarantine as described in (2);	<ol style="list-style-type: none">5. is caring for his or her child whose school or place of care is closed (or child care provider is unavailable) due to COVID-19 related reasons; or6. is experiencing any other substantially-similar condition specified by the U.S. Department of Health and Human Services.
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► ENFORCEMENT

The U.S. Department of Labor's Wage and Hour Division (WHD) has the authority to investigate and enforce compliance with the FFCRA. Employers may not discharge, discipline, or otherwise discriminate against any employee who lawfully takes paid sick leave or expanded family and medical leave under the FFCRA, files a complaint, or institutes a proceeding under or related to this Act. Employers in violation of the provisions of the FFCRA will be subject to penalties and enforcement by WHD.

For additional information or to file a complaint:
1-866-487-9243
TTY: 1-877-889-5627



WAGE AND HOUR DIVISION
UNITED STATES DEPARTMENT OF LABOR

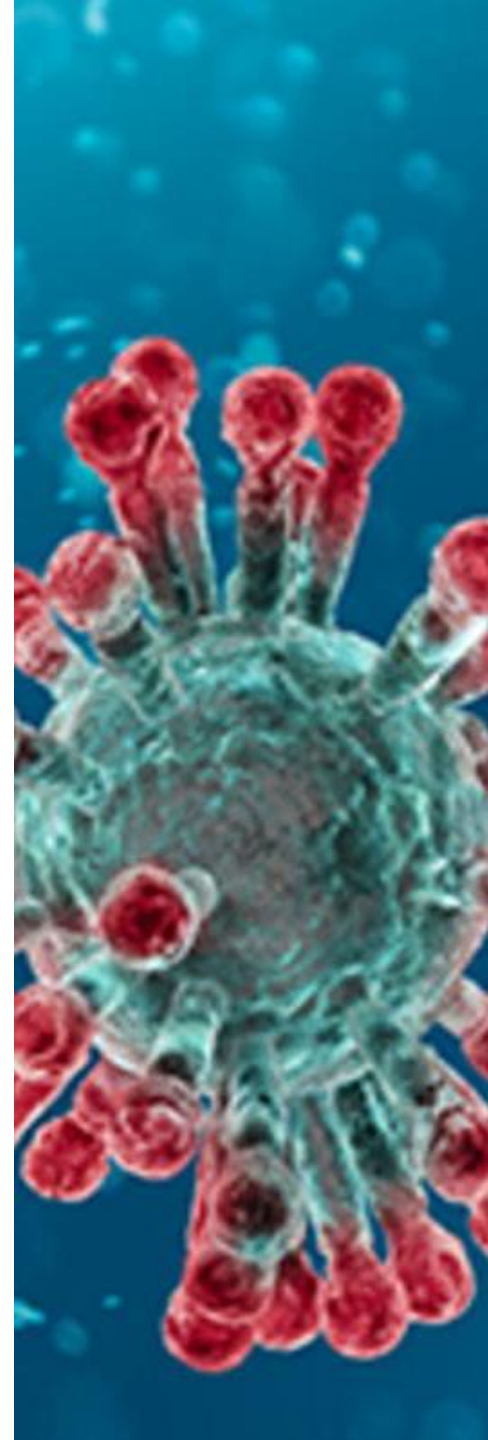


Infectious Disease Preparedness and Emergency Response Plan

Template and Resources

EHS  Support™

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