



Restarting Agriculture Business Operations

COVID-19

May 2020

Eventually, the stay at home orders that have been issued by various jurisdictions around the country will start to be lifted and organizations will begin phasing in workers back into their facilities and resuming operations. What should your organization be considering and/or preparing for in order to get back to business as quickly as possible?

The answers to this question can and will be different for each organization, whether your operations were considered essential or non-essential, your employees furloughed, or your facilities idle during the shelter in place period. As you re-open your business, protecting employees, customers and vendors will be essential. Any re-entry of worker strategy should consider the following:

- The Federal, State and local guidelines to lift the mandatory stay at home orders will guide the re-opening of many organizations. Coordination of these and any updated strategies will be crucial in the resumption of business operations. <https://www.whitehouse.gov/openingamerica/#criteria>
- Establishing a local pandemic response team
- Increased cleaning and disinfecting of shared and “high touch” areas within your facility. Please see Lockton’s dedicated document at: http://s3-us-west-2.amazonaws.com/lockton-corporate-website/Compliance-Alerts/Decontamination_and_sanitation_BP.pdf.
- Promoting and maintaining consistent social distancing: <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/social-distancing.html>.
- Potential limits on the number of people allowed in any one area/building.
- Consider staggering start times and workdays of employees.
- Protecting your employees with proper personal protective equipment (PPE).
- Addressing concerns from employees who may be reluctant to return to work.

- Providing training to employees as respects to best practices and safe workplaces related to COVID-19 exposure.
- Ensuring that idle equipment is ready for operations.
- Supporting employees that will continue to work remotely.
- Create a response and communication plan if employees become ill after returning to work.
- Lessons learned in order to update and revise your Business Continuity Program.
- Providing appropriate signage.

Organizations should keep in mind that the CDC and OSHA have developed detailed workplace guidelines in this area:

<https://www.osha.gov/Publications/OSHA3990.pdf>

The following are some areas of further consideration, which may be utilized in conjunction with the CDC and OSHA guidelines:

INITIAL PROGRAMS

As organizations begin to create policies to re-start their business operations and the return of their work force, we recommend the following aspects be considered for early implementation.

- **Appoint corporate and local multidisciplinary leadership teams to oversee the entire process and make critical decisions.**
- **Plan for greeters and management presence to direct patrons upon a reopening.**
 - ☐ Plan the message you want to convey.
 - ☐ Have directional signage and rules per any state or Federal Emergency reopening laws.
- **Create working committees or subcommittees to:**
 - ☐ Notify utilities and pertinent government entities.
 - ☐ Ensure that all regulatory authorities, such as those dealing with environmental permitting, are notified.
 - ☐ Audit equipment to ensure permits are current, such as pressure vessels.
 - ☐ Inspect and restart HVAC systems and make sure potable water supplies are safe.
 - ☐ Consult with any state or Federal emergency reopening orders to determine if increased ventilation requirements will be necessary.
 - ☐ Inspect and test any long idle equipment to assure it's in working order.
 - ☐ Design restart procedures, including computer systems, in accordance with manufacturer's specifications.
 - ☐ Assess raw materials and inventory on hand, restart supply chain and alert critical vendors. Keep an eye out for any raw material spoilage or shelf-life considerations.

- ☐ Identify necessary and “missed” preventative maintenance, equipment testing, and lubrication cycles.
- ☐ Repatriate any critical records, drawing, etc. taken off site.
- ☐ Test and prepare emergency generators and similar back-up systems, including fuel tanks.
- ☐ Reassess and implement security needs.
- ☐ Establish and spearhead communication protocols to employees, vendors and the media.
- ☐ Deal with post COVID-19 EAP related issues.
- ☐ Appoint a team who will be the first to enter the facility and perform initial property & process inspections. Make sure that the site team performing the initial site assessment is properly trained, issued appropriate PPE, and has an established plan before entering.

Business Supply List

Organizations should evaluate having protective and preventive supplies available for their employees and visitors. The supplies and their location may vary by the unique situation for your facility and operational needs. These supplies may include:

- ☐ Hand sanitizer (CDC recommends at least 60% alcohol-based).
- ☐ Sanitizing wipes (CDC recommends at least 70% alcohol-based).
- ☐ Disinfectants and disposable towels for workers to clean their work surfaces and equipment.
- ☐ Proper face masks. The CDC and OSHA recommends that Personal Protective Equipment (PPEs) be selected based upon the hazards of each individual workers.
- ☐ Disposable (latex and non-latex) gloves.
- ☐ Body Temperature Devices: [Guide for non-touch temperature devices](#).
- ☐ Display posters promoting hand-washing. Ask your local public health authority for these or look on www.WHO.int.

Employees

- If employees were furloughed, how many are going to be able or want to return to work?
- For those employees that are reluctant to return to your workplace, what can be done to reassure them that it is safe? Do you have an EAP program that can provide guidance and services for employees?
- Specific guidelines may also need to be established for employees with pre-existing or high-risk medical factors. This may include, but not limited to, the continued offering of voluntary remote work options for these workers.
- For those who do return, many may not have conducted their assigned duties in 60+ days, what kind of refresher training will be needed? Did they miss any scheduled safety training that will need to be completed?
- If furloughed employees do not return, how will new and/or replacement employees be hired? What time

frame is needed to locate and hire these new employees? How will orientation and training be completed in what could be tight time frames?

- An evaluation should be completed to determine if employees can remain working remotely and/or help stagger entry into the facilities during certain time periods. Remote working guidelines should continue to be followed and updated, as needed. This process will help create needed distance between workers and their work areas.
- See more information on remote workforce at: <https://www.lockton.com/coronavirus-mental-health-and-remote-workforce>.
- Business travel policies should be updated to promote and identify essential situations. Updated guidelines during business related travel should also be reviewed and modified, if needed. See the World Health Organization's guidelines on workplace and business related travel: <https://www.who.int/docs/default-source/coronaviruse/getting-workplace-ready-for-covid-19.pdf>.

Visitors

- Organizations can consider limiting their visitors to “critical business” only. The use of alternative mediums of conducting in-person meetings such as the leveraging of video conferencing, should be considered.
- Similar to your employees, a policy can be created which requires visitors to be screened via body temperature devices.
- Screening questionnaires related to COVID-19 symptoms and exposures can also be evaluated for use.
- Make sure visitors and customers have access to locations where they can wash their hands with soap and water.

Facilities

- Increased cleaning and disinfecting per CDC guidelines will need to be completed. Do you have the internal staff to perform or will a third party be utilized? How does this impact operations - workload or cost?
- Many companies were moving to hoteling or shared spaces before the pandemic. What are the mechanics in the “new normal?” Who will clean and disinfect the shared spaces between each employee's use? Is this going to be done in house or by a third party? If in house, is everyone willing and properly trained? Do we have the proper PPE for cleaning and disinfecting shared spaces?
- Consideration should be given to configure workstations and staggered employee re-entry, which will allow for adequate spacing between work areas. This may also include physical barriers and shields between workers, as well as with any customers or visitors.
- Depending upon the location of an organization's facilities, alternative temporary or pop-up offices can be evaluated to avoid public transportation or large number of commuters.
- For elevators and stairs, signage should remind individuals to follow needed social distancing criteria.
- Identified areas on flooring in a facility can also be utilized to remind individuals of the needed physical

separation with others.

- Minimize group meetings or large gatherings.

Equipment/Vehicles

- If equipment and/or vehicles sat idle, what start up procedures, maintenance and/or inspections are needed to get this equipment ready for regular day to day operations? Do you have the staff to complete or are your vendors prepared to assist? What is the timeline to get everything operational?
- Are state mandated inspections or registrations overdue for any company owned vehicles, trailers, etc?
- Any special equipment and/or start up requirements or protocols that need to be communicated?
- Startup operations involve many non-routines or seldom used procedures, is everyone involved in the startup familiar with the procedures and properly trained?
- If we are sharing equipment between employees, do we have a scheduled cleaning and disinfecting protocol? Can we limit only a select few employees to run such equipment?

Communication

If your business was impacted by the pandemic (e.g. confirmed transmission in your facility), proactive communication will be crucial to ensure that your customers and local community know that you are “open for business”. Provide clear and concise information describing any process or procedures your company has implemented to protect your employees, customers and community moving forward. It is expected that both customers and employees returning to their “normal” activities may experience a psychological hesitation of feeling safe. Communications of the pro-active actions taken to re-open facilities and keeping individuals free from known exposures will be invaluable in successfully moving forward.

Business Continuity

Once you return to your site, it is recommended that your Business Continuity Program (BCP) be reviewed and updated accordingly based on the outcomes and lessons learned through this pandemic so your organization is prepared for the future. All facets of your business should be examined (e.g. IT infrastructure, software and video conference platforms, remote working policy) and reviewed.

See Lockton’s article on Business Continuity: https://s3-us-west-2.amazonaws.com/lockton-corporate-website/Compliance-Alerts/Coronavirus_Continuity_GUIDE.pdf

Business Insurance Considerations

As workers, customers and visitors re-enter facilities, sound risk management techniques should be utilized for the pro-active safety of individuals and the protection of the organization. Entities should follow proper investigation and documentation techniques, for injuries and damages which may occur. All potential losses should be reported by organizations to their applicable insurance policies in a timely manner.

More information on COVID-19 related losses can be found at:

LOCKTON - CORONAVIRUS INSURANCE COVERAGE AND CLAIM GUIDANCE

http://s3-us-west-2.amazonaws.com/lockton-corporate-website/Compliance-Alerts/Coronavirus_Insurance_Coverage_and_Claims_Guidance.pdf

LOCKTON -PROPERTY BUSINESS INTERRUPTION AND CIVIL AUTHORITY COVID-19 CLAIM AND COVERAGE GUIDANCE

<https://www.lockton.com/insights/post/will-my-property-insurance-policy-cover-coronavirus-covid-19-losses>

LOCKTON – COVID-19 AND EMPLOYMENT PRACTICES RELATED CLAIMS

http://s3-us-west-2.amazonaws.com/lockton-corporate-website/Compliance-Alerts/Employment_Practices-Related_Claims.pdf

LOCKTON – EMPLOYER LIABILITY COVERAGE AND STRATEGY GUIDE

<https://lockton.global/2W6zAQf>

LOCKTON – MANAGING WORKER’S COMPENSATION FOR REMOTE WORKERS

<https://www.lockton.com/insights/post/managing-workers-compensation-exposures-from-remote-workers>

Re-start operations checklist

In order to further prepare for the resumption of operations and the re-entry of your workforce, the following is a checklist to consider for an organization's unique needs.

PROPERTY

- **Exterior**

- ☐ Check the overall condition of the exterior property such as gates and fences.
- ☐ Company signage is in place and current.
- ☐ Parking lots, roadways, sidewalks, traffic/pedestrian signage and striping.
- ☐ Lighting: Roadways, lots, sidewalks, security, etc.
- ☐ Landscaping, irrigation and drainage.
- ☐ Stored vehicles and parked equipment.

- **Building General**

- ☐ Critical communication equipment is working properly such as; electrical, Internet, antennas.
- ☐ Roof is in good shape, no visible leaks.
- ☐ Windows, loading docks, doors and other entrances and openings are in good repair.
- ☐ Backup generators are tested and fueled up if necessary.

- **Offices**

- ☐ Plumbing, process water and other potential sources of water leaks.
- ☐ Check sprinkler system to: confirm water supply integrity, inspect all valves to ensure all are open, locked and operating properly. Confirm water flow and valve tamper alarms are working. Inspect and test fire pump and related equipment. Resume routine system inspection, maintenance and testing procedures.
- ☐ Check the primary electrical service is working properly.
- ☐ Check that the HVAC system is working properly.
- ☐ Life safety features such as means of egress, signage, alarms and emergency lighting.
- ☐ Server rooms and data centers.
- ☐ Kitchens, employee break rooms, facilities: Ensure fire and ventilation systems are in working order.
- ☐ Restrooms are fully operational with adequate hand washing supplies.

- **Grain Handling Structures**

- ☐ Check the condition of the grain for bridging or caking.
- ☐ Preventative maintenance programs re-instated and documented.

- ☐ Life safety features such as means of egress, signage, alarms and emergency lighting.
- ☐ Processing equipment such as conveyors, augers, belts, storage structures are up to date with maintenance and ready for use.
- ☐ Ensure machine guards are installed and in place before operation.
- ☐ Ensure housekeeping schedules are still being followed and dust is cleaned up.
- ☐ MCC/Electrical rooms clean and free of combustibles.
- ☐ Dust collector systems are cleaned and ready for operation.
- ☐ Aeration fans are working and properly measuring moisture content.
- ☐ Temperature probes are working properly.
- ☐ Grain handling engulfment hazards have been reviewed before entering a grain structure.
- ☐ Ensure bearing monitors are hooked up and operational.
- ☐ Belts and conveyors are tracking properly.
- **Feed Manufacturing**
 - ☐ No new hazards are present when restarting the mill.
 - ☐ Update your food safety plan as appropriate.
 - ☐ Pests and spoiled product are removed and properly discarded of.
 - ☐ Sanitation is used as appropriate prior to starting the mill.
 - ☐ CGMPs are used for employees and the mill.
 - ☐ All ingredients and finished products are stored properly and away from hazardous materials/contaminants.
 - ☐ Mill components are properly inspected and maintained prior to start up.
- **Chemical / Dry Fertilizer Warehouse**
 - ☐ Containment in place and free of damage.
 - ☐ Emergency shower/eye wash stations turned on and ready for use.
 - ☐ Ensure no product spillage or tampering.
 - ☐ Emergency spill kits available.
 - ☐ Proper labeling of containers.
 - ☐ Safety Data Sheets are available and up to date.
 - ☐ Towers of built up fertilizer are knocked down appropriately.
- **Bulk LP / Anhydrous Ammonia Tanks**
 - ☐ Proper PPE is provided before operation.
 - ☐ Emergency shutoff valves working properly.

- ☐ Valves in good condition and operating correctly.
- ☐ Hose approved for product transfer and in good condition.
- ☐ Ensure no tampering.
- ☐ Maintenance is up to date such as; painting tanks, pressure relief valves, etc.
- ☐ Safety Water is provided – Anhydrous Ammonia.
- ☐ Nurse tanks are inspected prior to filling and leaving the lot.
- ☐ Lots are maintained free of combustibles.
- ☐ Grasses and weeds are removed from storage areas.
- ☐ Pop-off valves are intact and have not been activated.

- **Fuel Storage**

- ☐ Containment in place and free of damage.
- ☐ Hose approved for fuel transfer and in good condition.
- ☐ Safety and no smoking signage in place.
- ☐ Fire extinguisher provided and in operational condition.
- ☐ Leaks checks completed for state reporting.
- ☐ Inventory is accurate.

- **Convenience Stores**

- ☐ Ensure restrooms are fully operational with adequate cleaning supplies.
- ☐ Fuel pumps are in good working order.
- ☐ Outside LP/Fuel storage has not been tampered with and secured.
- ☐ Fire extinguishers are inspected and functional.
- ☐ Exit signs are inspected and illuminate when necessary.
- ☐ Counters, dispensers, and food preparation areas are sanitized appropriately.
- ☐ Aisles and walkways are clear from obstructions.
- ☐ Telecommunications and Internet are fully operational.
- ☐ Security devices (cameras, locks, alarms, etc.) work as intended.
- ☐ Establish procedures to limit contact between workers and customers.
- ☐ Ensure a regular sanitation schedule is implemented and followed.

- **Animal Handling Facilities**

- ☐ Products and materials for proper bio-security protocols are available.
- ☐ PPE required for employees who administer vaccinations to animals.

- ☐ Safe animal handling basics.
- ☐ Make sure all aeration fans are working properly.
- ☐ Animal waste is maintained to an acceptable level.
- **Security**
 - ☐ If provided at the facility during the shut-down, review daily reports or electronic records to identify any critical items such as safety issues, property damage, etc., that must be dealt with prior to restart.
 - ☐ If provided by internal staff, re-establish protocols.
 - ☐ Confirm access control systems operating properly.
 - ☐ Are alarms operational and verify if new passwords/codes need to be established.
 - ☐ Confirm any target items (cash, precious metals) left on site are secure.
 - ☐ Confirm camera and monitoring systems working.
- **Fire Protection**
 - ☐ Confirm operation of smoke detectors and other fire detection hardware and resume routine system inspection, maintenance and testing procedures.
 - ☐ Confirm placement and operational readiness of fire extinguishers.
 - ☐ No smoking signs are present where necessary.
- **Fleet/Equipment Operations**
 - ☐ Vehicle yard secure.
 - ☐ All maintenance is up to date and pre-trips have been conducted.
 - ☐ Are state mandated inspections or registrations overdue for any company owned vehicles, trailers, etc.
- **Farm Deliveries**
 - ☐ Contact location prior to deliver to determine drop-off point and delivery instructions.
 - ☐ Confirm there is signage on the property to identify drop-off location.
 - ☐ Avoid personal interaction if possible.
 - ☐ Sanitize before and after every delivery.
 - ☐ Park away from housing and high traffic areas.
- **Locations Under Construction**
 - ☐ Determine and abide by any current government mandates and/or applicable infectious disease protection protocols for your jurisdiction (i.e. required PPE, questions, training, etc.).
 - ☐ Consider and manage any supply chain difficulties, which could lead to further project delays.

- ☐ Ensure there is an adequate supply of employee PPE such as gloves, dust masks, filtering face pieces (N95 respirators), face shields, etc.
- ☐ Assemble a small team to walk the site and document all conditions via video or photo. Consider having subcontractor representatives accompany the group to offer input and evaluate their scope of work.
- ☐ Follow safety protocols for restarting utilities (i.e. arc flash protection for switchgear, natural gas supplies, etc.).
- ☐ Ensure portable restrooms and break areas are cleaned, disinfected and properly spaced before reopening the site.
- ☐ Assess and perform any necessary machine inspections and/or re-certifications (cranes, hoists, conveyors, HVAC, mechanical, etc.) per applicable regulations and manufacturer recommendations.
- ☐ Contact GC or owner to discuss possible alterations to scope, schedule or protocols that differ from when the project initially shutdown.
- ☐ Determine if previously utilized medical services, such as clinics, remain available.
- ☐ Determine if local emergency services remain available.
- ☐ Inspect and ensure site and public traffic control protocols and devices remain effective.
- ☐ Ensure general public protective systems remain effective, including but not limited to fencing, barricades, lighting, signage and sidewalks/walkways.
- ☐ Solicit feedback from and encourage communication between all site employees to ensure any post shutdown changes are clearly identified and understood.
- **Claims Considerations**
 - ☐ Review physical plant, stock, fleet, equipment for damage.
 - ☐ Review global supply chain restrictions and restocking restrictions.
 - ☐ Consider any increased cyber vulnerability with increased work from home or movement back to online operations.
 - ☐ Any increased FDA or other Federal scrutiny accompanying supply chain revision, rerouting, etc.

PEOPLE

- **Employee Safety Considerations**
 - ☐ Is refresher training warranted for critical OSHA and safety sensitive processes necessary, such as confined space entry or fall protection.

- ☐ Mandated annual safety training which is now overdue.
- ☐ Missed routine safety training.
- ☐ Expired medical clearances.
- ☐ Overdue safety inspections.
- ☐ Are you requiring N95's to be worn when returning to work? Medical evaluations, fit testing, and training is now needed.

- **Claims Considerations**

- ☐ Consider challenges with returning furloughed or new employees to work.
 - Review and restart random drug testing and other screening protocols.
 - Review and restart fit for duty and physical capabilities testing exams.
- ☐ Restart transitional modified duty programs for employees previously off work or working modified duty due to Workers' Compensation pre-closure claims.
- ☐ Rebuild job banks.
- ☐ Reestablish wellness programs.
- ☐ Work with Worker's Compensation carriers and employment attorneys to assure statutory compliance.
- ☐ Confirm procedures in place to thoroughly investigate all reported accidents, including first aid cases and near misses.
- ☐ Coordination of continued leave for COVID-19 sick leave or Workers' Compensation with FMLA and ADA guidelines.
- ☐ Establish a plan to deal with a potential increase in claim filing due to layoffs.